

Person ID / Consultee	Name / Consultee	Company / Consultee	Rep ID	Document location (Part, paragraph, title, policy)	Soundness	Soundness test	Soundness support details	Soundness n/a answers	Soundness recommendations	Legal compliance	Non legal compliance details	Officer response (public)
829908	Andrew Wood		LP59	Version Control	No	Positively prepared			A better title would be "Growth to happen in a few small areas while the benefits are to happen elsewhere" rather than "Managing Growth and Sharing the Benefits" Growth continues to be focussed on relatively small areas of LBTH like Aldgate, Poplar and the Isle of Dogs. I do not believe that is sustainable given transport, density and flooding issues. The benefits though in terms of CIL and S106 spend are still predominately in areas not undergoing as much development.	Yes		No change. The approach to distribution set out in the Local Plan is based on robust evidence and has been robustly assessed against alternatives through the London Plan. This strategy seeks to focus growth within the Major of London's three opportunity areas (Lower Lea Valley, City Fringe/Tech City and Isle of Dogs and South Poplar) which extend over half of the borough's total land area. Significant amounts of new housing are also planned across central parts of the borough (see table 1 of the Local Plan). Developer contributions (CIL and section 106 agreements) will continue to play an important role in supporting the delivery of key infrastructure and service provision in Aldgate, Poplar and the Isle of Dogs. The Regulation 123 List identifies the types of infrastructure that will be partially or wholly funded through CIL.
1142078	Ian Shacklock	Friends of Regent's Canal	LP37	Version Control, Version Control	No	Consistent with national policy			This part of the Local Plan is not sound (i.e. positively prepared and consistent with national policy) with reference to "protecting and celebrating our history and heritage" at the Bethnal Green Holder Station. Specifically, Figure 25 and the related Design principles need to be changed to ensure the retention and incorporation of the No.2 and No.5 gasholders: as requested in the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031; and for all the reasons set out in the relevant sections of Historic Waterside Gasholders in LB Tower Hamlets (East End Waterway Group July 2017), including resubmitted petition; and compliance with National Planning Policy Framework para. 58 and PPG 007, as set out in 12 May 2017 letter from The Victorian Society . Furthermore, the No.2 and No.5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent's Canal Conservation Area "The Regent's Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canals special character and interest" (Regent's Canal Conservation Area Appraisal). They should therefore be conserved "so that they can be enjoyed for their contribution to the quality of life of this and future generations" (NPPF para.17 tenth bullet point); and "put to viable uses consistent with their conservation" (NPPF para. 126 first bullet point).	No	The changes set out below would make this part of the Local Plan positively prepared and consistent with national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE 25 1. Please add correctly sized and located rings to show the two gasholder guide frames (as done on Figure 36) 2. Please move the open space to the west to include the No. 2 gasholder guide frame and exclude the No. 5 gasholder guide	The plans will be amended to show the gasholders. The plans are for illustrative purposes and the exact location of the open space will be agreed through the pre-application/planning application process, but they will be amended to show the pedestrian and cycle routes only going to the edge of the green space. However, it is not considered necessary to amend the wording as active frontages can include pedestrian and cycling routes, and this will be addressed through the development management process. The second bullet point in the table (page 188) will be amended as follows: "Development will be expected to: retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5 , Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings.. It is not considered necessary to include the words "where possible" as the term should have sufficient flexibility. It is not considered necessary to amend the wording as active frontages can include

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								As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as "land where development would be inappropriate...because of its...historic significance" (NPPF para. 157 seventh bullet point). "The No.2 Gasholder at Bethnal Green is believed to be the world's second oldest surviving gasholder."		<p>frame 3. Please replan the strategic routes and local routes to avoid passing through the two gasholder guide frames 4. Please replan the three canalside routes as the single route described below</p> <p>DESIGN</p> <p>PRINCIPLES 1. Second bullet point, please remove "reuse and enhance" and "including the gasholders" and replace with the following: "retain in situ and conserve the entire No. 2 columnar guide frame (on its in-ground brick tank) as a 'gasholder park', like that at King's Cross" "retain in situ and conserve the entire No.5 lattice guide frame (on its in-ground concrete tank) and insert a well-designed circular block of flats, like those at King's Cross" 2. fourth bullet point, please remove "provide active frontage set back from the canal" and replace with: "provide a single pedestrian/cycling route (to serve as a waterfront walk, strategic and local pedestrian/cycling route) along the short western part</p>	<p>pedestrian and cycling routes, and this will be addressed through the development management process.</p> <p>The proposed wording is not considered to be appropriate as it has not been determined whether the gasholders will incorporate flats.</p> <p>It is not considered necessary to include the words where possible as the term should have sufficient flexibility.</p> <p>Strategic open space has been allocated to sites to address the boroughs open space deficiencies as well as accommodate active recreation and sport in accordance with policies S.OWS1 and D.OWS.3.</p>

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											<p>and long eastern part of the canal's south bank and around the western, southern and eastern parts of the No. 5 lattice guide frame" NB The blocks inside the three gasholder guide frames at King's Cross do not have public rights of way along their part of the canal.</p> <p>3. fourth bullet point, please remove "to avoid excessive overshadowing" and replace with: "so that only the circular block of flats in the No.5 lattice guide frame would overshadow the open space in the morning and The Oval in the afternoon" 4. fifth bullet point, please insert "where possible", between "align" and "with"</p> <p>5. eighth bullet point, please remove "consolidated open space which is designed to be usable for sport and recreation" and replace with: "open space for sport and active recreation, including open space (in the No.2 columnar guide frame) for passive recreation like 'gasholder park at King's Cross'.</p>	

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1142078	Ian Shacklock	Friends of Regent's Canal	LP817	Version Control, Version Control	N/A			report added				Information is noted
1142078	Ian Shacklock	Friends of Regent's Canal	LP818	Version Control, Version Control	N/A			report added				The three historic gasholders have been put forward for local listing. The local list is due to be adopted at the end of 2018 so a decision is awaited. However, the status of the gasholders falls outside the scope of the Local Plan. We are seeking to retain the existing gasholders at Marian Place and eastern part of the gasholders at Leven Road (Poplar) as set out in section 4 of the Local Plan.
1142078	Ian Shacklock	Friends of Regent's Canal	LP819	Version Control, Version Control	N/A			report added				Part of the gasholder will be retained and reused on site.
1139815	Michael Byrne		LP7	Version Control, Version Control	No	Justified			I would like to object on grounds that this plan is neither justified or effective. The plan does not justify where development must take place. Whilst it is accepted that the Isle of Dogs is named as a site for expansion in the London plan, this is not, in fact, the point in the borough with the best transport links, health care and it only has a single secondary school at present. Whitechapel has more transport links, a state of the art hospital and numerous schools. It is also the site for the new Civic Centre. It has an Ideas store and plenty of shops. The council maintains that developers do not want to develop there, but this is nonsensical given that developers are commercial beings and will develop where the money is. If the council opens the area for development, of course the developers will come. Secondly, the plan identifies a large amount of infrastructure that will be required to be delivered, but does not say how it will be delivered. The Isle of Dogs is already at creaking point and without the new infrastructure it cannot be expected to take additional people. There are only two roads onto the Island and these are already at breaking point with all of the construction vehicles and the increase in online deliveries. The DLR and Jubilee lines are already at capacity and Crossrail is a long way north to be convenient. Healthcare facilities are maxed out. Most importantly though, the council owns no land on the Isle of Dogs so cannot actually build the new facilities and does not require developers to build them for them. As such, the Isle of Dogs will become a ghetto and this is not sustainable.	No	The document does not comply with the requirement to create a sustainable environment that is compatible with our human rights and EU directives, for example, on clean air. The document needs to spread the load of development and ensure that all communities have the facilities they need	No change. As set out in chapter 4 of the Local Plan, the scale and level of growth within the Isle of Dogs will need to go hand in hand with significant investment in new infrastructure and service provision. As a result there will be a significant uplift in the quality and capacity of infrastructure and services in this part of the borough. Key proposals include: -improvements to existing community facilities (including expansion and redevelopment of existing health centres); -provision of new neighbourhood centres; -new river crossings (including a new road tunnel under the Thames linking the Greenwich Peninsula and Silvertown); -significant new publically accessible open space (at least 1 hectare on some sites); and -the provision of a number of new primary schools to support future housing growth in the Isle of Dogs. The Infrastructure Delivery Plan sets out in more detail how this will be delivered. This is a living document so there will be ongoing monitoring of future capacity and infrastructure capacity on an annual basis. Whitechapel forms part of the City Fringe opportunity area where significant growth is planned, in line with the Whitechapel Masterplan Vision and City Fringe Opportunity Area Planning Framework.

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1142661	Abdul Basit		LP561	CONSULTATION INFORMATION, CONSULTATION INFORMATION	N/A					No	<p>Consultation Process There appears to have been distinct lack of consultation with local people, including insufficient explanation of the contents and aims given that the Area is in the main growth area outlined in the Plan. The consultation should have been more focussed on those areas most impacted by the Local Plan i.e. Aldgate, Poplar and the Isle of Dogs. There was only one session at Alpha Grove Community Centre in the 2nd round of consultations in this Area. The Regulation 19 consultation initially did not include any meetings in the E14 area; but later on had a meeting at the Jack Dash House. Had the Regulation 18 had enough consultation dates on the IoD our members would have managed to attend. It was a mis-opportunity for the council not able to consult those residents who they ask to take the most density in the whole of the borough. The</p>	<p>The Local Plan has involved extensive engagement with the local community, residents, businesses, developers, statutory bodies, government agencies, the voluntary sector and partner agencies throughout its preparation, whose views have helped to positively shape and inform its content.</p> <p>Two public events were scheduled during the regulation 19 consultation at Whitechapel Idea Store (11 October 2017) and Bethnal Green Library (Thursday 19th October). These venues were chosen as they are centrally located in the heart of the borough, making them accessible to the greatest number of people. This provided an opportunity to explain how they can make comments on the plan and the procedures which need to be followed. A third event was scheduled in response to comments from elected members to give the local community an opportunity to understand the level of growth being planned within the Isle of Dogs and to explain how they could respond through the regulation 19 process.</p> <p>The event at Jack Dash House (Monday 16 October) was advertised and the event was fully booked the weekend before the event took place. On the night, only 24 people turned up (out of the 45 people who had already pre-booked to attend the event) and 8 people were walk-ins. Anyone who could not attend or book onto the system could still go to the other event at Bethnal Green.</p> <p>All three events were designed as workshops. Laying out a room for a workshop-style event limits the number of people who can attend. On the day of the event at Jack Dash House, we altered the layout of the room to allow more people (especially walk-ins) to attend and participate in the workshop.</p> <p>These events exceeded the requirements set out in the Statement of Community Involvement, which outlines how the council will consult and engage with the local community during the preparation of the Local Plan. We have also had a healthy response both to events and representations submitted during the</p>

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											council may have managed to tick the boxes on consultation but it was not robustly done. The lack of proper consultation itself makes the local plan unsound	regulation 19 stage.
1033272	James Stevens	Home Builders Federation Ltd	LP786	CONSULTATION INFORMATION, CONSULTATION INFORMATION	N/A			It has been difficult to comment effectively on the local plan because a key element of the evidence base, namely the GLA SHLAA 2017 – upon which the Local Plan depends to demonstrate its housing land supply, and hence the deliverability of the housing requirement – has not yet been published. This document was not available among the list of evidence base documents at the time of writing – i.e. the 6th November 2017, and nor was it available on the GLA's website. The GLA confirmed that it was not yet published. Once this element of the evidence base is published it may require scrutiny by interested parties.			The SHLAA methodology has been published as part of the new London Plan. Details on the availability, deliverability, capacity and suitability of SHLAA sites in relation to Tower Hamlets are kept confidential (as per the GLA SHLAA methodology) and therefore cannot be made publically available (except those which are already in the public domain).	
1054344	National Grid	National Grid	LP203	CONSULTATION INFORMATION, CONSULTATION INFORMATION	Yes			National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation. Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could		Yes		Comment noted

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								affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:				
1137662	Anil Mohinani		LP3	MAYOR'S FOREWORD , MAYOR'S FOREWORD	No	Effective			90% of the development plots in this document are in the isle of dogs / south poplar area yet this document does not ensure infrastructure and open spaces are guaranteed for the area (instead relying on developers to deliver these services). If developers were not greedy then it could be work but the reality is they only care for their shareholders so for every school they build they add another two 30 storey building with 600 units. please can the council wise up and make direct investments to buy up zones to secure we have the right infrastructure in place.	Yes		<p>Comment is noted. The Local Plan will play a key role in ensuring that the right infrastructure is provided in the right locations at the right time to meet the long term needs of the borough's growing population.</p> <p>Part 5 of the document sets out the means by which the draft policies in the plan will be implemented through the greater use of our statutory powers (e.g. land assembly) and through partnership working with stakeholders and local communities in order to deliver new homes and jobs and supporting infrastructure.</p> <p>The Local Plan sits alongside an Infrastructure Delivery Plan which sets out what infrastructure is required to support the growth set out in the Local Plan (including the Isle of Dogs and South Popular area) and how it will be delivered.</p>
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP663	PART 1: SETTING THE SCENE, Chapter 1: Introduction	No				<p>Consultation Process There appears to have been distinct lack of consultation with local people, including insufficient explanation of the contents and aims given that the Area is in the main growth area outlined in the Plan. The consultation should have been more focussed on those areas most impacted by the Local Plan i.e. Aldgate, Poplar and the Isle of Dogs. There was only one session at Alpha Grove Community Centre in the 2nd round of consultations in this Area. The Regulation 19 consultation initially did not include any meetings in the E14 area; but later on had a meeting at the Jack Dash House. Had the Regulation 18 had enough consultation dates on the loD our members would have managed to attend. It was a mis-opportunity for the council not able to consult those residents who they ask to take the most density in the whole of the borough. The council may have managed to tick the boxes on consultation but it was not robustly done. The lack of proper consultation itself makes the local plan unsound</p>	No		<p>The Local Plan has involved extensive engagement with the local community, residents, businesses, developers, statutory bodies, government agencies, the voluntary sector and partner agencies throughout its preparation, whose views have helped to positively shape and inform its content.</p> <p>Two public events were scheduled during the regulation 19 consultation at Whitechapel Idea Store (11 October 2017) and Bethnal Green Library (Thursday 19th October). These venues were chosen as they are centrally located in the heart of the borough, making them accessible to the greatest number of people. This provided an opportunity to explain how they can make comments on the plan and the procedures which need to be followed. A third event was scheduled in response to comments from elected members to give the local community an opportunity to understand the level of growth being planned within the Isle of Dogs and to explain how they could respond through the regulation 19 process.</p> <p>The event at Jack Dash House (Monday 16 October) was advertised and the event was</p>

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											<p>fully booked the weekend before the event took place. On the night, only 24 people turned up (out of the 45 people who had already pre-booked to attend the event) and 8 people were walk-ins. Anyone who could not attend or book onto the system could still go to the other event at Bethnal Green.</p> <p>All three events were designed as workshops. Laying out a room for a workshop-style event limits the number of people who can attend. On the day of the event at Jack Dash House, we altered the layout of the room to allow more people (especially walk-ins) to attend and participate in the workshop.</p> <p>These events exceeded the requirements set out in the Statement of Community Involvement, which outlines how the council will consult and engage with the local community during the preparation of the Local Plan. We have also had a healthy response both to events and representations submitted during the regulation 19 stage.</p>
1142677	Crest Nicholson		LP582	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A		On behalf of our client, Crest Nicholson, Savills is responding to the Regulation 19 consultation on the proposed submission version of the Tower Hamlets Local Plan. The consultation represents the final opportunity to comment on the content of the Plan, prior to its submission for an Examination in Public. At present, the London Borough of Tower Hamlets ('Tower Hamlets') anticipates that the emerging Plan will be adopted at the end of the second quarter in 2018. The Plan will replace the adopted Core Strategy (2010) and the Development Management Document (April 2013) and cover a 15 year period from 2016 to 2031. The purpose of this representation is to promote the former London Chest Hospital (herein known as 'the site') for future residential (Use Class C3) and non-residential institutional floorspace (Use Class D1) development.				Comment noted

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1054236	EID Partnership		LP176	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A		<p>We write on behalf of the EID Partnership, advised by Trilogy Property Advisers, who have the freehold interest in the East India Dock Estate. Officers will be aware that Savills have been making a series of planning applications on behalf of the owners over recent months for the regeneration of the wider estate in line with an overarching 'masterplan' to reposition it to better meet the needs of the types of business we expect to be able to attract to this part of London, and that development pursuant to those planning permissions has now begun on site. Further to the representations submitted in respect of the Regulation 18 version of the draft Local Plan, thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 19). Central to Trilogy's philosophy for the repositioning of the estate is the need to create a place that offers value, inspiration and convenience to occupiers. A place where, as with other successful creative villages such as Shoreditch, people can work, live and play, and 'traditional' distinctions between uses become blurred. As such, the vision for what is now known as 'Republic', is for a place that offers stripped back and functional accommodation based on the refurbishment and optimisation, rather than the replacement, of Anchorage House and Capstan House combined with a new attractive public realm that can provide an activated place for people to meet, exchange ideas and do business, and that connects better into its context at the same time as providing the facilities that enable those that occupy the space to make lifestyle choices that respond to their aspiration for convenience and well-being. We anticipate that our repositioning of Republic will enable us to generate up to 6,000 jobs, particularly for those displaced from places like Shoreditch, where market maturity means that rents are becoming increasingly unattractive</p>				Comment noted

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							for some. These dynamics point to a much broader mix of land uses than currently exist on site, which we anticipate could include a series of non-commercial uses, potentially including community and education uses, where there is no net loss of commercial floor space over the life of the project, and to a much greater level of integration with surrounding regeneration initiatives at Leamouth, Blackwall and Poplar and associated transport nodes. We would encourage officers to ensure that the emerging Local Plan is clear in its recognition of this vision. In this context, we have the following comments on the policies of the emerging plan and hope that these can be incorporated:				
1054236	EID Partners hip		LP313	PART 1: SETTING THE SCENE, Chapter 1: Introductio n	N/A		Officers will be aware that the planning applications made over recent months for "Republic" the East India Dock Estate have included a diversification of the ground floor and basement areas to bring forward a range of uses including retail, restaurant and sports facilities. It is our intention to bring forward an employment led mixed use offer that sought to ensure that there is no net loss of employment floor space, in line with the Local Employment Location set out in the Emerging Plan, whilst ensuring that other uses are brought forward that contribute to placemaking and complement the office function of the estate. Future uses can be expected to include the type of uses for which planning permission has already been sought together with elements of residential and shorter term accommodation (that might include 'pocket living/collective' style homes) designed to reinforce the creation of a neighbourhood in which people can work, live and play, and which complement the employment spaces on offer. These uses may also potentially include cultural or education facilities to further enliven and enrich the work space environment. Should community or educational infrastructure be				Comment noted

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								considered an appropriate part of any mix, the impacts on commercial viability will need to be appropriately balanced against other planning objectives for the site and it is anticipated that the mix and tenure of any residential accommodation to be provided will be adjusted accordingly, in the context of creating an 'employment led' place.				
1054236	EID Partners hip		LP326	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			As noted above, key to our ambition for the site is to ensure that it is connected to its immediate urban realm. Significant areas of land are located to the south of site which have been 'left over' following the delivery of road and rail infrastructure that help ensure that the site is connected 'regionally' but which create severance locally. These areas of land are often poorly used but, given their linear nature, offer potential to reconnect places. We would welcome a dialogue to seek to explore the potential of these areas for a blend of community uses and short term visitor accommodation that can provide a pedestrian grid and connectivity north south across Aspen Way and east west between Poplar and Blackwall as part of a 'bigger vision' for Blackwall. Such infrastructure could link East India to Leamouth, Trinity Buoy Wharf and The Thames and a holistic ambition should be developed within the draft plan for a 'low-line' to reconnect these isolated places to help build a collective identify for this reach of riverside and the communities who live there. That 'low line' will undoubtedly unlock its own development opportunities that should be captured in the plan.				Comment noted
1054236	EID Partners hip		LP344	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			We thank you again for considering these representations and we would welcome a broader dialogue with officers to ensure that the potential of East India Dock and the wider area are captured in the emerging plan. We would be grateful for confirmation of receipt of these representations. Please do not hesitate to contact us using the details at the head of this letter				Comment noted

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								should you require any further information.				
1143353	Greenland Hertsmer e (London) Ltd		LP852	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 19). We write on behalf of Greenland Hertsmer e (London) Ltd, who are the owner of the 2 Hertsmer e Road site in Canary Wharf where the residential led development Spire London is currently under construction. Spire London will comprise 67 storeys and deliver 861 homes, supporting amenity uses, flexible commercial space and new public realm. Greenland have demonstrated their ongoing commitment to the London Borough of Tower Hamlets (LBTH) by undertaking extensive engagement with LBTH throughout the design process, and Greenland seek to continue this productive engagement during the ongoing construction phase of development to support the timely delivery of the scheme. In the context of Greenland's current investment in LBTH through the Spire London site, and in relation to any other sites which Greenland may seek to bring forward in LBTH in the future, we would suggest that the policies of the emerging plan and allocation are adjusted to incorporate the following amendments discussed below.				Comment noted
1143353	Greenland Hertsmer e (London) Ltd		LP854	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			We note that the site lies within the 'place' of Canary Wharf – one of 24 'places' that have been identified around the Borough. On the draft Policies Map the site also lies within: · Isle of Dogs and South Poplar Sub Area Opportunity Area · Preferred Office Location: Canary Wharf Secondary · Tower Hamlets Activity Areas: Isle of Dogs Activity Area · Strategically Important Skyline: Canary Wharf Area · Canary Wharf Cluster · Archaeological Priority Area: Isle of Dogs				Comment noted
1143353	Greenland Hertsmer e (London)		LP856	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Tower Hamlets is uniquely placed in London to act as a focus for growth and any new local plan must recognise and reflect this in its ambition. We are pleased to note				Support welcomed

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	Ltd			n				that this sentiment is captured in the emerging Local Plan and would expect all decisions on policy direction to be framed and taken in this context.				
1143353	Greenland Hertsmer e (London) Ltd		LP877	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			We thank you again for considering these representations and we would welcome a broader dialogue with officers to ensure that the potential of both the delivery of Greenland's Spire London site, and the wider Canary Wharf area are captured in the emerging plan. We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet. Please do not hesitate to contact us on the details at the head of this letter should you require any further information.				Comment noted
1141900	Gregory Brackett		LP408	PART 1: SETTING THE SCENE, Chapter 1: Introduction	No	Positi vely prepa red; Justifi ed; Consi stent with natio nal policy			We are instructed by Gregory Brackett, as a representative of the owners and residents of properties and land within the Canal Cottages site, including: Gregory Brackett (Land Adjacent to No 1), Hazel White (No 2), Adam Dewhurst & Colleen Murphy (No 3 & Canal Operations Office), Tim Walker (No 4), to provide the following response to the London Borough of Tower Hamlets Draft Local Plan. The site, including nos. 1-4 Canal Cottages and the land adjacent, is hereon referred to as the Canal Cottages site. Please find attached a copy of the site plan. Our clients are concerned that there is no proposal to alter the Metropolitan Open Land (MOL) designation to remove the Canal Cottages site, and therefore considers that the plan is unsound as it is not positively prepared, justified nor consistent with National Policy and the London Plan. As relevant background information, the Canal Cottages site is currently partially within designated Metropolitan Open Land (MOL) and comprises an area of approximately 0.16 ha. The site is situated alongside Victoria Park in east London, adjacent to Hertford Union Canal to the south. The site is distinctly separate from the park of which it is adjacent and comprises four privately owned houses and adjacent land. The site is situated within the Victoria Park Conservation Area and the adjacent Victoria Park itself is a grade II* listed park. No. 3 Canal Cottages comprises a Grade II listed early 19th century cottage. To the south of the site is the Hertford Union Canal and the 'Top Lock', a grade II listed lock. The southern fringes of the land adjacent to no. 1 Canal Cottages appears to fall within a Site of Importance for Nature Conservation (SINC) designation. The draft Local Plan Policies Map shows the retention of the Metropolitan	Yes		The London Plan sets out strong support for the current extent of MOL, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. It seeks to protect the MOL from inappropriate development, except in very special circumstances, giving the same level of protection as with Green Belt designation. The MOL designation in Tower Hamlets is long established and clearly identified on previous and current plans. The Local Plan's approach to protect and seek to enhance all open spaces (including MOL) is in line with national and regional planning policy and due to the severity of the open space deficiency in the borough is also justified. Overall, it is not considered that there is sufficient evidence in this case to justify the removal of the site from the MOL designation.

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									<p>Open Land (MOL) designation across Victoria Park, and also across the row of cottages and adjacent land in the Canal Cottages site. Our clients support the retention of the MOL designation across Victoria Park. However, they strongly object to the designation of the Canal Cottages site as MOL. Indeed, there a number of reasons which suggest that the Canal Cottages site should be removed from its MOL designation, as discussed below. The London Plan states that alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process. It gives guidance to local authorities when designating MOL, and the policy and supporting text states: "To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria: a it contributes to the physical structure of London by being clearly distinguishable from the built up area b it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London c it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value d it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. 7.56 The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and quality of life. Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate. Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Green chains are important to London's open space network, recreation and biodiversity. They consist of footpaths and the open spaces that they link, which are accessible to the public. The open spaces and links within a Green Chain should be designated as MOL due to their London-wide importance." Taking each of these criteria in turn, in respect of criterion A, the Canal Cottages site is not clearly distinguishable from the built-up area. The site includes four dwellings which are situated in close proximity to the existing built-up area, in particular the properties at Parnell Road and appears as a continuation of this development. Indeed, access to the site is taken from Parnell Road, adjacent to the site. The canal acts as the only separation of the site from the built-up area. Although situated adjacent to Victoria Park, the site is clearly distinct and separate to it. It is bound by mature trees to its north-eastern,</p>			

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									<p>north-western and south-western edges, clearly separating it from the Park. Furthermore, land adjacent to no. 1 is fully enclosed by a 7' high brick and timber wall and as such is fully screened from views from the park, canal, towpath and any public way. These boundaries, together with the site's location in close proximity and relationship to the built-up area, maintains its separation from the publically accessible Victoria Park, which is designated as MOL. As such, unlike the Park itself, the site is not clearly distinguishable from the built-up area and as such does not contribute to the physical structure of London. The Canal Cottages site does not meet criterion B, which seeks open air facilities which serve significant parts of London, by nature of its private residential use and lack of public access. Indeed, it is clearly not included in the 'publically accessible open space' as identified on Tower Hamlets' policies map and is entirely private land. Land adjacent to no. 1 Canal Cottages is also enclosed by a high wall, providing no use or benefit to members of the public. With regard to criterion C, whilst Victoria Park contains features and landscapes of national and metropolitan value, including historic features, recreation and biodiversity, the Canal Cottages site comprises a very different character and appearance dominated by the private residences it contains. In terms of landscapes of national or metropolitan value, the Canal Cottages site itself is separated from Victoria Park and largely screened from view on its north-eastern, north-western and south-western edges as set out above, including the land adjacent to no. 1 which is fully screened from view by a 7' high wall which encloses it. As such, the site clearly remains isolated and separate from Victoria Park and there is little contribution of the site to the value of the wider open landscape of the Park. Furthermore, there is little value in the view of the properties from the front in this wider park landscape, given that they appear urban in character. In terms of features of national or metropolitan value, the Canal Cottages site contains a listed building at no. 3. However, this is protected by means of its statutory listing and should not merit the site being designated MOL. The southern fringes of the site, specifically at land adjacent to no. 1, appears to fall within the wider Site of Importance for Nature Conservation (SINC) site (the canal bank). However, the area contained within the site is minimal and given that the majority of the site falls outside of this designation, this should not warrant grounds for the inclusion of the site, or majority of it, in the MOL designation. In respect of criterion D, the Canal Cottages site does not form part of any designated Green Chain. The NPPF defines green infrastructure as: "A network of multi-functional green space, urban</p>			

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									<p>and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.” Whilst Victoria Park comprises green infrastructure, the Canal Cottages site itself is outside the Park and does not deliver quality of life benefits for local communities as it comprises private residences and land which are not accessible to the public. As such it differs in character and function to Victoria Park. The southern fringes of land adjacent to no. 1 Canal Cottages appears to fall within the Site of Importance for Nature Conservation (SINC) designation. However, it is clear that this designation primarily relates to the canal, and the Canal Cottages site itself provides little in terms of environmental benefits for local communities. Given the site’s location alongside Victoria Park, the remainder of which does comprise green infrastructure and is of a substantial scale, and for the reasons set out above, the site is not considered to provide a link in the network of green infrastructure. On the basis of the above assessment, it is clear that the site is separate and distinctly differs in nature to the Park and does not meet any of the MOL criteria. As such it should therefore be removed from MOL designation. Further to the reasons set out above, it is clear that the MOL policy designation was intended to be applied specifically to Victoria Park. Indeed, it is notable that other properties adjoining Victoria Park are not within the MOL designation, including those at St. Mark’s Gate. This area comprises a number of built structures including predominantly residential units, together with commercial and community uses. This area is surrounded by MOL but specifically excluded from it as shown on the adopted Policies Map and as highlighted on the submitted extract from the Tower Hamlets draft Local Plan Policies Map. As such, it appears that the MOL designation has been applied “broad brush” across Victoria Park and in doing so has inadvertently incorporated adjacent land, including the Canal Cottages site. This is further supported by the fact that the MOL boundary at the site cuts through the curtilage of the properties in a discordant and unjustified manner, as can be seen on the attached plan (ref: 13008/01), not following any identifiable boundary on the ground. It should be noted that the London Plan states that the policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). Paragraph 85 of the NPPF states that when defining boundaries, the Council “should not include land which it is unnecessary to keep permanently open”. The Canal Cottages site, by reason of the existing buildings present and boundary treatment, clearly does not comprise open land and therefore on this basis it is unnecessary and unreasonable to</p>			

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									<p>propose to safeguard it in this manner, as suggested in the draft Local Plan. Furthermore, paragraph 85 stipulates that local planning authorities “should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” The existing boundary clearly does not adhere to this, and the curtilage of the site, comprising mature landscaping, would provide such an identifiable and robust boundary. Any development on the site following the removal of MOL designation would still be regulated by planning controls in respect of the adjacent MOL designation of Victoria Park, inclusion and proximity to designated heritage assets, and incursion of the Site of Importance for Nature Conservation (SINC). Accordingly we maintain that the MOL designation has been incorrectly applied to the Canal Cottages site, without the necessary justification to do so, as required by the NPPF. The proposed designation of Canal Cottages as MOL is therefore unsound as it conflicts with Paragraphs 79 – 82 of the NPPF. It is not justified as it is not the best strategy when considered against the reasonable alternative of taking this site out of the MOL and it is not positively prepared as it unnecessarily restricts the potential of the Canal Cottages site. In summary, the Canal Cottages site, including land adjacent to no. 1 Canal Cottages, is clearly distinct and separate to Victoria Park, to which it lies adjacent. It is considered that upon careful assessment, the site does not meet any of the criteria for MOL as set out above, as it does for the adjacent Victoria Park. Furthermore, the MOL designation was intended to cover Victoria Park and appears to have been incorrectly applied to the site in a “broad brush” manner, which is supported by the exclusion of other properties adjoining the Park and the positioning of the boundary cutting through the site in an unjustified and discordant manner. As such and for the reasons set out above, our clients object to the current draft Local Plan on this basis and considers the MOL designation should be removed at the site. Amend the proposals map to exclude the Canal Cottages site from the MOL designation. Please find attached plan ref: 13008/01 showing the MOL boundary in the context of the Canal Cottages site, as indicated on the draft Local Plan Policies Map (2016) (which reflects the same MOL boundary as on the existing adopted Policies Map), together with a plan ref: 13008/02 showing the proposed boundary, where we consider it should be amended.</p>			

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1143348	Healey Development Solutions	Healey Development Solutions (Millharbour) Ltd	LP838	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Thank you for providing us with the opportunity to comment on the Tower Hamlets Local Plan 2031, Regulation 19 Consultation. We are responding on behalf of our client, Healey Development Solutions (Millharbour) Limited, who is acting on behalf of the owners of the site (Millharbour ACQ Limited and 365 ACQ Limited) at 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street, London. Healey Development Solutions (Millharbour) Limited submitted a full planning application in November 2016 for the demolition of existing buildings at 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street and the comprehensive mixed use redevelopment including two buildings ranging from 26 storeys (90.05m AOD) to 30 storeys (102.3m AOD) in height, comprising 319 residential units (Class C3), 1,708sqm (GIA) of flexible non-residential floor space (Classes A1, A3, A4 and D1), private and communal open spaces, car and cycle parking and associated landscaping and public realm works. This application went to Strategic Planning Committee on 26th October 2017 with an officer recommendation to grant planning permission (subject to any direction by the London Mayor and the signing of a Section 106 legal agreement). It was set out within the Committee Report that the development proposals comply with both existing and emerging planning policies. A recommendation to refuse planning permission was decided by Members and the applicant is awaiting the grounds for refusal, although reference to the acceptance of the height and scale of the development proposals against the Council's emerging 'stepping down' policy is considered likely. We have reviewed the consultation document and supporting evidence and documents that have been used to inform the Regulation 19 Draft Local Plan and provide the following comments:				Comment noted

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1143348	Healey Development Solutions	Healey Development Solutions (Millharbour) Ltd	LP839	PART 1: SETTING THE SCENE, Chapter 1: Introduction	Yes		<p>It is our understanding that under the Council's emerging Local Plan, the Site continues to be:</p> <ul style="list-style-type: none"> • Located within the Isle of Dogs & South Poplar Opportunity Area, identified as an area for strategic growth in emerging policy S.SG1; • Located within an Area of Regeneration identified in the London Plan and sits within the Isle of Dogs Activity Area (a form of town centre) where a mixture of uses which provide a transition between the scale, activity and character of Canary Wharf major town centre and the surrounding places will be supported; • Allocated for comprehensive mixed-use development to provide a strategic housing contribution, commercial floor space and open space (reference Site Allocation 4.7 Millharbour South) <p>We support this consistent approach.</p>					Support welcomed

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1143348	Healey Development Solutions	Healey Development Solutions (Millharbour) Ltd	LP840	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			The officer's committee report considers the development proposals seek to deliver the identified land uses, infrastructure requirements and design and delivery principles of the emerging Site Allocation (in line with Policy S.SG1). Specifically, it is set out within the emerging Site Allocation that development on the Site should "step down from Canary Wharf to the smaller scale residential areas of south Millwall Dock". Our representations are focused in particular on this and the acceptability of a tall building on the site:				Comment noted
1143156	Hondo Enterprises	Hondo Enterprises	LP761	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			On behalf of our client, Hondo Enterprise, owners of the East Ferry NCP Car Park site we wish to make representations on the Regulation 19 Local Plan for the London Borough of Tower Hamlets. Our client's site is subject to a site allocation within Crossharbour Town Centre (Site Allocation 4.3) within the emerging Local Plan and presents an opportunity to deliver significant development. The Site lies within the Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) which has significant capacity to accommodate new housing, commercial and other development. The representations are made pursuant to the following sections of the Local Plan:				Comment noted.
1033272	James Stevens	Home Builders Federation Ltd	LP784	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Thank you for consultation on Tower Hamlet's new Local Plan for 2016 - 2031 The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year, including almost half of the affordable homes built each year in England. Furthermore this investment in new housing in the West of England also delivers money for local infrastructure through various				Comment noted.

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								channels, including private planning contributions such as the Community Infrastructure Levy, Section 106 obligations, government funding to support housing growth and additional local authority revenues through Council Tax and the New Homes Bonus. In addition we provide employment and training in skills.				
1052842	James Hills		LP564	PART 1: SETTING THE SCENE, Chapter 1: Introduction	No	Consistent with national policy		see attachment These representations refer specifically to the site at 82-84 Rhodeswell Road, E14 7TL, for which representations were submitted in relation to the Regulation 18 consultation, and which have not been taken on board by the Council. No justification or explanation as to why the proposed changes set out in the previous representations were not adopted as part of this latest draft of the Local Plan, therefore further updated representations are set out in the attached document. In summary, the site consists of a small piece of land known as 82-84 Rhodeswell Road, which is currently designated as part of a wider area of Metropolitan Open Land (MOL), covering the adjacent Mile End Park. The site has been occupied by two shipping containers for several years and the boundary is marked by 2m high corrugated graffiti covered fence. The site is unattractive, harmful to the surrounding Mile End Park, MOL and adjacent Regents Canal Conservation Area. The previous representations demonstrate that the site does not meet any of the tests or purposes of including land within the MOL (Policy 7.17 of the London Plan) or Green Belt (para.80 of the NPPF). Further to this, proposals have been developed, and a planning application been submitted to Tower Hamlets to redevelop the site to provide three new residential units. The scheme proposes a terrace of three one-bedroom units contained within a carefully designed scheme, which seeks to preserve and enhance the neighbouring Conservation Area, contribute positively to the neighbouring Mile End Park, and have	These representations refer specifically to the site at 82-84 Rhodeswell Road, E14 7TL, for which representations were submitted in relation to the Regulation 18 consultation, and which have not been taken on board by the Council. No justification or explanation as to why the proposed changes set out in the previous representations were not adopted as part of this latest draft of the Local Plan, therefore further updated representations are set out in the attached document. In summary, the site consists of a small piece of land known as 82-84 Rhodeswell Road, which is currently designated as part of a wider area of Metropolitan Open Land (MOL), covering the adjacent Mile End Park. The site has been occupied by two shipping containers for several years and the boundary is marked by 2m high corrugated graffiti covered fence. The site is unattractive, harmful to the surrounding Mile End Park, MOL and adjacent Regents Canal Conservation Area. The previous representations demonstrate that the site does not meet any of the tests or purposes of including land within the MOL (Policy 7.17 of the London Plan) or Green Belt (para.80 of the NPPF). Further to this, proposals have been developed, and a planning application been submitted to Tower Hamlets to redevelop the site to provide three new residential units. The scheme proposes a terrace of three one-bedroom units contained within a carefully designed scheme, which seeks to preserve and enhance the neighbouring Conservation Area, contribute positively to the neighbouring Mile End Park, and have no greater impact on openness, thus resulting in no other harm to the MOL. The proposed development has many positives: - Contributes to much needed housing stock in the Borough - Provides a drastic improvement to the appearance of this dilapidated site, which in turn will have a positive impact on the character and appearance of the surrounding area and policy designations - Provides a development, which brings life to the canal-side and neglected section of Mile End Park, introduces natural surveillance, and provides an attractive, high quality designed building, which is sympathetic with its context and subservient when viewed from the surrounding area and landscape and townscape designations. - Provides a sustainable development, which makes the most of this well			No change. The London Plan sets out strong support for the current extent of MOL, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. It seeks to protect the MOL from inappropriate development, except in very special circumstances, giving the same level of protection as with Green Belt designation. The MOL designation in Tower Hamlets is long established and clearly identified on previous and current plans. In line with the London Plan, any alterations to the boundary of MOL should be undertaken by boroughs through the local plan process, in consultation with the Mayor of London and adjoining authorities. The Local Plan's approach to protect and seek to enhance all open spaces (including MOL) is in line with national and regional planning policy and is also justified due to the severity of the open space deficiency in the borough. A recent assessment of Tower Hamlets open spaces identified that the current level of open space provision is 0.89 hectares per 1,000 residents which is less than the borough's open space standard of 1.2 hectares per 1,000 residents. In line with the information and policies outlined above, we do not consider that there is sufficient evidence to justify a review of the existing MOL boundary on an individual site basis. We consider the current policy approach which seeks to protect the existing MOL designation from 'inappropriate development' to be sound. As part of the Local Plan process, we have not undertaken a review of the MOL due to the severity of open space deficiency in the borough as well as the sufficient supply of brownfield development sites.

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								<p>no greater impact on openness, thus resulting in no other harm to the MOL. The proposed development has many positives: - Contributes to much needed housing stock in the Borough - Provides a drastic improvement to the appearance of this dilapidated site, which in turn will have a positive impact on the character and appearance of the surrounding area and policy designations - Provides a development, which brings life to the canal-side and neglected section of Mile End Park, introduces natural surveillance, and provides an attractive, high quality designed building, which is sympathetic with its context and subservient when viewed from the surrounding area and landscape and townscape designations. - Provides a sustainable development, which makes the most of this well connected site, which is in close proximity to shops, services and leisure facilities. - Encourages sustainable travel by being car free All the above points amount to very special circumstances that would make development of this MOL site acceptable in policy terms. In summary, the site does not meet the tests of including land within the MOL designation, and redevelopment as proposed would only result in positive impacts on the surrounding area. The draft Local Plan is not 'sound' as it is not consistent with National Policy, specifically, a presumption in favour of sustainable development (para.12 NPPF) and fails to take account of the need to promote sustainable patterns of development (para.84 NPPF). It is for these reasons that we respectfully request that the Proposals Map is updated to remove this site from the MOL.</p>	<p>connected site, which is in close proximity to shops, services and leisure facilities. - Encourages sustainable travel by being car free All the above points amount to very special circumstances that would make development of this MOL site acceptable in policy terms. In summary, the site does not meet the tests of including land within the MOL designation, and redevelopment as proposed would only result in positive impacts on the surrounding area. The draft Local Plan is not 'sound' as it is not consistent with National Policy, specifically, a presumption in favour of sustainable development (para.12 NPPF) and fails to take account of the need to promote sustainable patterns of development (para.84 NPPF). It is for these reasons that we respectfully request that the Proposals Map is updated to remove this site from the MOL.</p>			

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1054293	Jeanette Hawkins	Forestry Commission, South East and London Area Office	LP349	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Local Plans and ancient woodland – Forestry Commission approach The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations. A summary of Government policy on ancient woodland Natural Environment and Rural Communities Act 2006 (published October 2006). Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. National Planning Policy Framework (published March 2012). Paragraph 118 – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”. National Planning Practice Guidance – Natural Environment Guidance. (Published March 2014) This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non-statutory consultee on “development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in Natural England’s Ancient Woodland inventory), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings” It				Information is noted

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								<p>notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient. Standing Advice for Ancient Woodland and Veteran Trees. (Published April 2014) The Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. The Standing Advice website will provide you with links to Natural England's Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website. The UK Forestry Standard (3rd edition published November 2011). Page 24 "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance</p>				

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								<p>SLNCIs). Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005). Page 10 “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”. Natural Environment White Paper “The Natural Choice” (published June 2011) Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”. Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”. Biodiversity 2020: a strategy for England’s wildlife and ecosystem services (published August 2011). Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS). Renewable & low carbon energy The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change. Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management. Flood risk The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland. The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives</p>				

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								highlighted above. In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through: • the inclusion of green infrastructure (including trees and woodland) in and around new development; and • the use of locally sourced wood in construction and as a sustainable, carbon lean fuel. Yours sincerely, Forestry Commission, South East and London Area Office				
1143308	Raycliff Whitechapel	Memery Crystal	LP793	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			We write on behalf of our client, Raycliff Whitechapel, to make representations to the London Borough of Tower Hamlets (LBTH) Local Plan 2031, Regulation 19 Version, which is currently out for consultation. Our client has purchased the former Whitechapel Bell Foundry at 32- 34 Whitechapel Road and 2 Fieldgate Street, E1 1DY, and is considering future development options for the vacant site. They therefore, have a keen interest in the emerging planning policy context in LBTH, as this will inform and help steer the future proposals.		Yes		Comment noted

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1142559	Tim Brennan	Historic England	LP431	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<p>Thank you for the opportunity to comment on the draft Tower Hamlets local plan. As the Government's statutory adviser, Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process. The National Planning Policy Framework (NPPF) identifies the historic environment as a relevant matter contributing to sustainable development (para 7), and includes it within the set of core planning principles (para 17). National policy is clear that local plans should contain a 'positive strategy for the conservation and enjoyment of the historic environment' (paras 126 and 157), while it also recognises the value that the historic environment can bring in inspiring high quality design in new development (paras 58 to 61). The following comments are made in the context of the principles contained in the NPPF and the accompanying Planning Practice Guide (PPG). Detailed comments in relation to the text are set out at the end of this letter. In general terms, we welcome the commitment shown in the plan to the conservation of the historic environment, and in particular the way it is considered against a wide range of objectives set out in the draft. We note that the evidence base produced as part of the local plan process is comprehensive in relation to the historic environment, and welcome the production of a wide-ranging Conservation Strategy. This document is very much aspirational in tone and contains a number of ambitious objectives for the local historic environment. However, beyond brief mentions in paragraphs 3.38 and 3.39 there is no reference to the Strategy in the draft Plan, giving the impression that this is in fact a standalone document. Strengthening the relationship between the Conservation Strategy and the draft Plan through further references in the text would go a</p>			<p>Comments noted and support welcomed.</p> <p>Insert references to the "Conservation Strategy" under the "Evidence links" box in relation to policies D.DH4 (Shaping and managing views), D.DH5 (World heritage sites) and D.DH7 (Tall buildings).</p> <p>While other references could be included in other sections of the plan, the policies in chapter 3 will be used alongside other relevant policies to assess the merits of planning applications in relation to heritage and conservation issues. The plan will be considered as a whole (see paragraph 1.6).</p>	

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							significant way to ensure that the Plan is compliant with the NPPF and its requirement for a positive strategy for the historic environment. This could be achieved by ensuring that the Conservation Strategy is referenced in appropriate places. The most straightforward would be as part of the evidence base in relation to the proposed policies on shaping & managing views, tall buildings and world heritage sites as well as policy S.DH3 heritage & the historic environment. Given the extensive nature of the Conservation Strategy's contents, we consider that further references would also be appropriate to make clear the potential contribution of heritage to economic growth (principally through tourism) in Chapter 5, the role of local character and distinctiveness in town centre management (Chapter 6) and the importance of properly considering heritage as part of environmental management (Chapter 9). These amendments would also raise the profile of the Conservation Strategy and improve the prospects of its deliverability.				
1142985	Transport for London (TfL)	Transport For London	LP698	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A		TfL welcomes the opportunity to comment once again on the LB Tower Hamlets draft Local Plan. TfL has worked closely with the borough to assist in the development of the Local Plan, and we will continue to offer further advice to the borough on any further development. The following comments represent TfL's view in terms of operational and land use planning / transport policy matters as part of our statutory duties. This response is split into two parts. The first highlights general comments from our review of the Draft Local Plan and is accompanied by more detailed comments in Section 2. This response builds on previous responses, consultation and engagement, particularly in terms of the evidence that underpins the Local Plan.				Comment noted

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1142985	Transport for London (TfL)	Transport For London	LP699	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> Overall TfL understands and supports the continued delivery of infrastructure across the borough to support housing growth. TfL continues to work with the borough and GLA to develop suitable packages of transport measures, particularly in the context of growth in Opportunity Areas. 				Support welcomed
1142985	Transport for London (TfL)	Transport For London	LP700	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> TfL welcomes the support for the importance of strategic infrastructure such as river crossing capacity, both in terms of the Silvertown Tunnel and proposed Rotherhithe - Canary Wharf Crossing, as well as the delivery of a new, more spacious DLR trains. 				Support welcomed
1142985	Transport for London (TfL)	Transport For London	LP701	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> TfL also welcomes and recognises the importance of addressing local connectivity across the borough, particularly around the City Fringe, Isle of Dogs, South Poplar and Leamouth (including the Housing Zone). In particular we recognise the importance of delivery of bridge infrastructure to support connectivity and growth, for example across South Dock and River Lea, and should be highlighted throughout the Local Plan. 				There are various references concerning the provision of water support infrastructure such as bridges and crossings throughout the document, with a specific focus on enhancing links across the rivers Lea and Thames, including a new pedestrian and cycle crossing between Canary Wharf and Rotherhithe and a series of new pedestrian footbridges and walkways at suitable locations within the Lower Lea Valley, notably at Ailsa Street and Leven Road.
1142985	Transport for London (TfL)	Transport For London	LP702	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> Overall we welcome the broad approach to freight across the Local Plan. It takes into account freight well, especially water – although any reference to rail freight is lacking. It would be helpful if the borough could acknowledge the role of rail freight. DSP's and FORS should also be mentioned in the plan. TfL welcomes further engagement with the borough in developing freight tools, mitigation and measures to support both existing communities, jobs and growth across the borough. 				Comments noted. A reference to railways has been added to paragraph 11.46. A reference to the need to meet CLOCS and FORS standards has been added to the end of paragraph 11.42, and explanations of these terms have been added to the glossary (see appendix 1).

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1142985	Transport for London (TfL)	Transport For London	LP703	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> The draft London Plan is due to be published later in 2017, when there will be an opportunity for the borough to align the Local Plan with emerging policies, for instance around car parking standards for new developments. Proposal 76 in the new Mayor's Transport Strategy looks to impose higher expectations on developers to deliver solutions that promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places. Car parking provision should be restricted within new developments, with those locations more accessible to public transport expected to be car free. TfL would welcome further discussion with the borough on this issue once the draft London Plan has been published. 				We have sought to align the Local Plan to the strategic transport objectives of the Mayor of London and TfL, including the 'A City for all Londoners' document and the Mayor's Transport Strategy. There is likely to be some further alignment required to the New London Plan once it is adopted, including standards, which will be addressed through the review of the Local Plan.
1142985	Transport for London (TfL)	Transport For London	LP704	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Generally, the strategic policies as they relate to transport should look to be more in line with mayoral commitments as set out within the new Mayor's Transport Strategy, in order to encourage people to travel by sustainable modes, as well as to walk or cycle shorter local journeys. These policies should be directly evidenced within the Plan, as currently there are strong statements with regards to the need for a step-change in future transport capacity, yet it is unclear what this is referring to or what is required.				The policy and text contained within the Local Plan is fully evidenced by the Strategic Transport Assessment carried out in 2016, which underpins the plan. This assessment concluded that further investment in transport infrastructure, above that already planned, would be required to support the level for growth forecast in the borough. We agree this that can be more clearly explained in some sections of the plan. Please see amendments to chapter 3 (part 1).
1142985	Transport for London (TfL)	Transport For London	LP708	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			TfL suggest that where wayfinding improvements are highlighted, Legible London is stated as the required system				It is felt that this level of prescription is not necessary to add to the plan.

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1142985	Transport for London (TfL)	Transport For London	LP721	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<ul style="list-style-type: none"> Overall there is also lack of consistency in terms of the visuals and maps across the document, particularly in terms of the site allocations, which creates unnecessary confusion. TfL would suggest separating out pedestrian and cycle routes as these have very different design requirements and this may result in inappropriate cycle provision being proposed but also may undermine the delivery of important cycle connections. All of the maps should be looked at together to ensure that they give a comprehensive picture and a clear and integrated approach to local connections. Some of the routes are drawn in an unclear way which doesn't appear fully resolved in some places. Some of the proposed strategic connections don't appear to connect to anything - what is the rationale behind this hierarchy? 				We appreciate that pedestrian and cycle routes have different design requirements, but we are reluctant to include that level of prescription on the site allocations by distinguishing between pedestrian and cycle routes. Regarding your comments on strategic link connections, we will conduct a full review of all site allocation maps to ensure that the links are correctly located and categorised.
1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP881	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			<p>Thank you for providing us with the opportunity to comment on the Managing growth and sharing the benefits, Regulation 19 Consultation on the Tower Hamlets Local Plan 2031. We are responding on behalf of our client West India Property Investments Limited, who are the owners of 82 West India Dock Road. 82 West India Dock Road comprises vacant brownfield land, which is currently enclosed by hoarding. The site was previously occupied by office and light industrial uses and was cleared in 2008 following the implementation of a planning permission for a hotel comprising of 252 hotel bedrooms between 3 and 16 storeys in height, which remains extant. Representations to the Tower Hamlets Local Plan 2031 – Regulation 19 Consultation (October 2017) We have reviewed the consultation document and supporting evidence and documents that have been used to inform the Regulation 19 Draft Local Plan and provide the following detailed comments.</p>				Comment noted

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP913	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			On behalf of our client, Westferry Developments Ltd, who are freehold owners of the Former Westferry Printworks, site we wish to make representations pursuant to the Regulation 19 Local Plan for the London Borough of Tower Hamlets. Our client's site is subject to a site allocation (Site Allocation 4.12) within the emerging Local Plan. The Site lies within the Isle of Dogs and South Poplar Opportunity Area and also within an Area of Regeneration. Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility Planning permission was granted on 4th August 2016 (LP A Ref: P A/15/02216) for demolition of the existing buildings and structures at the Westferry Printworks Site and the subsequent comprehensive mixed use redevelopment comprising a secondary school, 722 residential units, together with other retail, flexible office and community uses. Our client is currently discharging all pre-commencement obligations to redevelop the former Printworks and deliver the Council's wider strategic planning objectives for the site. The representations are made pursuant to the following sections of the Local Plan:				Comment noted
635797	Greater London Authority		LP670	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			Thank you for your correspondence of 02 October 2017 consulting the Mayor of London on Tower Hamlets' draft Local Plan – Regulation 19 Consultation. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. On 08 February 2016, the Mayor provided comments on the initial stage of the Plan, and on 30 December 2016, the Regulation 18 version of the document. The Mayor is of the opinion that Tower Hamlets' draft Local Plan is in general conformity with the London Plan,				Comment noted. We welcome the GLA's comment confirming that the Local Plan is in general conformity with the London Plan. The Local Plan sets out a review mechanism to ensure the policies are up to date and consistent with national and regional planning guidance (see part 5). Government guidance stipulates that local plans should be reviewed and updated within five years.

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								subject to the Plan being reviewed within 10 years of its adoption in order to address housing supply in the later period of the Plan. The Mayor has afforded me delegated authority to make more detailed comments on the emerging Local Plan on his behalf. Representations from Transport for London (TfL), which I endorse, are included in this letter at Annex 1.				
635797	Greater London Authority		LP671	PART 1: SETTING THE SCENE, Chapter 1: Introduction	Yes		The draft Local Plan is comprehensive and generally takes a proactive approach to development, positively embracing growth. This is reflected by the fact that over half of the borough is designated as one of three Opportunity Areas and the borough has the highest housing target of any London borough. It also has significant potential for growth in employment floorspace. In this regard, Tower Hamlets has been working constructively with my officers on the Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF). The approach set out in the draft Local Plan is broadly supported.					Support for our approach is welcomed

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635797	Greater London Authority		LP697	PART 1: SETTING THE SCENE, Chapter 1: Introduction	N/A			The Mayor's new draft London Plan will be published in December 2017 for consultation. Tower Hamlets should consider the direction of travel of the policies set out in this document when finalising its own plan. I hope that these comments can inform the Examination of Tower Hamlets' Local Plan. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised.				Comment noted. Although the London Plan is still at consultation stage, the policies in the Local Plan appear to be broadly aligned with those within the emerging London Plan. The Local Plan is also in general conformity with the current London Plan.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP300	PART 1: SETTING THE SCENE, 1.1 Paragraph	Yes		These representations are submitted on behalf of Bishopsgate Goods Yard Regeneration Limited ('BGYRL'), a 50/50 joint venture between Hammerson plc and Ballymore, in relation to the London Borough of Tower Hamlet's 'Draft Local Plan 2031' document. BGYRL jointly own the rights to develop Bishopsgate Goods Yard which is the largest development site in the City Fringe Opportunity Area. In 2010, together with Tower Hamlets and Hackney, the Greater London Authority published Interim Planning Guidance (IPG) for the site that provides a framework for the future comprehensive development of the site and acts as a material			Yes		Comment noted and support welcomed. We have been working closely with officers from the London Borough of Hackney throughout the Local Plan process to discuss cross-boundary issues of strategic importance within our respective boroughs. Further detail on the outcome of these discussions is set out in the Duty to Cooperate Statement.

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							consideration in determining future planning applications. The nature and extent of the guidance document emphasises the strategic importance of the site and explains the various opportunities and challenges associated with its redevelopment. The opportunity is welcomed at this stage to respond to this consultation and actively support the positive approach the document takes in promoting growth and development in Tower Hamlets. Our client is generally supportive of the positive approach taken by the draft Local Plan in seeking to maximise the growth potential of LBTH to accommodate additional housing and employment floorspace to meet the growing population in the Borough.					
1131148	LB Hackney	LB Hackney	LP571	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			We welcome the opportunity to comment on the submission version of Tower Hamlets' Local Plan. Hackney is supportive of the vision, key objectives and principles set out in the Plan. Ongoing Duty to Cooperate discussions have taken place between Tower Hamlets and Hackney during the preparation of Tower Hamlets' Local Plan and				Comment noted

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								Hackney's Local Plan 2033. In line with our previous representations on the Regulation 18 consultation, Hackney's response will focus on the key strategic issues of housing, employment and tall buildings.				
1054252	Londone wcastle	Londone wcastle	LP596	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			On behalf of our clients, Londonewcastle, Cross Property Investment SARL, Cross Property Investment West SARL Ltd and Cavell Properties SARL Ltd, we are writing to submit representations regarding the Council's consultation on the proposed new Local Plan. These representations relate in general terms to the policies in the draft Local Plan, but also comment specifically on policies directly relating to the Whitechapel Estate site where relevant. Londonewcastle is a multi-award winning London residential developer and development manager that was established in 1995. The team has developed over 500 homes of mixed tenure in the capital. Londonewcastle's current pipeline of committed projects will deliver more than 3,000 homes over the next 5 years. The company has established a reputation as one of the leading residential-led mixed-use developers in London through a constant insistence on design-led architecture and uncompromising attention to detail. The business maintains an overriding interest in new development and regeneration projects that create a sense of place, foster long-term communities and in doing so, meets the long term needs of Londoners. The opportunity is welcomed to respond to this consultation.				Comment noted

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1054252	Londone wcastle	Londone wcastle	LP598	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			Our client is generally supportive of the objectives of the draft Local Plan in seeking to maximise the growth potential of LBTH to accommodate additional housing and employment floorspace to meet the growing population in the Borough. However, we do not believe that the Local Plan as currently drafted fully maximises the opportunity and there are a number of aspects of the proposed policies that we object to, as detailed below. Our comments relate to the policies in the order in which they appear in the draft Local Plan.				Support welcomed. Comments noted.
1142716	Lyca Group		LP639	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 19). We write on behalf of Lyca Group who own a 3.46 acre site in the South Quay area of London's Docklands, referred to as Thames Quay. This site falls within, and is located at the western end of, the Site Allocation 4.5 Marsh Wall East set out on Pages 182 & 183 of the draft Local Plan. Lyca Group have engaged in each of the preceding rounds of public consultation and look forward to continuing to develop an appropriate framework to create the certainty of outcome required to enable this pivotal site to be brought forward for development with confidence. The Thames Quay estate was constructed in the late 1980s and comprises Independent House, the ISIS Building, the Walbrook Building and 197 Marsh Wall. These buildings are currently let to a variety of occupiers. An increasing proportion of the estate is falling vacant and at 30 years old, the buildings are increasingly obsolescent. As such, Lyca Group are currently exploring options to optimise the site to deliver a mixed use scheme. In this context, we would suggest that the policies of the emerging plan and allocation are adjusted to incorporate the following amendments discussed below.				Comment noted

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1142274	Manpreet Kanda	Royal Borough of Kensington & Chelsea	LP173	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			Thank you for the opportunity for the Royal Borough of Kensington and Chelsea (RBKC) Council to respond to the LBTH Draft Local Plan. These comments are made in light of the statutory Duty to Cooperate which places a legal duty on the Councils to engage "constructively, actively and on an on-going basis" in "maximising the effectiveness" of Local Plans relating to "strategic matters" which may impact on at least two planning areas including in connection with infrastructure which is strategic.				Comment noted
1142656	Rabina Khan		LP519	PART 1: SETTING THE SCENE, 1.1 Paragraph	No	Positively prepared; Justified; Effective			Please find attached the additional document outlining areas of concerns within the Local Plan including Brexit and the failure to carry out a Full Equalities Impact Assessment making references to key points in the Local Plan. Executive Summary This report highlights the main concerns regarding the Tower Hamlets Local Plan 2031, specifically the flaws in the housing development vision, sustainable growth and the failure to mention what potential impact Brexit will have on housing, business and employment, apart from a paragraph on page 17 that states "...it may have an impact on the role of London as a financial service hub for Europe". The plan has also not mentioned Grenfell, nor has a full Equalities Impact Assessment been carried out.	Yes		<p>Policy D.ES7 ensures that development can achieve the highest standards in relation to renewable energy and energy efficiency but it is deliberately technology neutral so that schemes can find the best individual solutions. No change.</p> <p>The Local Plan recognises the importance of keeping buildings and spaces safe, secure and resilient (see section 2). The principles of 'secured by design' have also been embedded into the policies, with a view to ensuring that new development does not have an adverse impact on public safety and the surrounding network of streets and spaces (see D.DH2, D.DH6, D.DH10 and D.DH11). Fire and safety considerations are specifically addressed in sections 3 and 6 of the draft Local Plan.</p> <p>In relation to tall buildings, consideration of public safety requirements will need to be demonstrated as part of the overall design, including the provision of evacuation routes (see policy D.DH6: Tall buildings).</p> <p>In relation to HMOs, applicants will be expected to comply with the appropriate fire safety standards (see policy D.H7: housing with shared facilities).</p> <p>In relation to waste collection facilities and bin stores, suitable safety control measures will be required to mitigate the fire risk (e.g. sprinklers, fire extinguishers and smoke detection equipment). The Mayor of London is consulting on a series of fire safety standards as part of the consultation to the new London Plan in response to the Grenfell Tower fire. However, the London Plan is still at an early stage in its</p>

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											<p>development and the recommendations of the public inquiry into the Grenfell Tower fire are still awaited.</p> <p>Policy S.H1 of the Local Plan seeks to ensure that new development does not undermine the supply of self-contained family homes, in view of current shortages. Family homes will form a key element of the overall housing mix within new developments (see policy D.H2). Unit sizes will need to include larger family homes. In the case of affordable housing, any off site provision will be expected to deliver better outcomes for all of the sites, including a higher level of rented family homes. Retention of existing units will also be sought in residential conversions and estate regeneration schemes. A number of the site allocations will also be expected to maximise the provision of family homes. No change.</p> <p>The potential impact of Brexit on the borough is acknowledged in the plan (see chapter 6). Regular monitoring will be undertaken to assess the impact of changing circumstances on the effectiveness of Local Plan policies. Among the potential triggers include:</p> <ul style="list-style-type: none"> - future economic downturns / cycles which may restrict the ability of developers or public bodies to provide housing or infrastructure; and - changes in the availability of public funding – this may restrict the delivery of infrastructure or prevent some sites from coming forward.

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1142656	Rabina Khan		LP541	PART 1: SETTING THE SCENE, 1.1 Paragraph	No	Positively prepared; Justified; Effective			5. Brexit Although the full impact of Brexit is not known at the moment, there is enough evidence to suggest that Tower Hamlets will be one of the hardest hit boroughs, losing some eight per cent of output worth £11 billion, because of its reliance on industries that are significant exporters, at risk of offshoring to the EU, or are deeply embedded in international supply chains. Therefore, some elements of the proposed local plan are unrealistic, because they do not consider the ramifications of Brexit. In addition, a hard Brexit will cause financial firms to move from Canary Wharf to more favourable cities in Europe, resulting in fewer jobs and reduced commercial and housing development. Research from Centre for London found that Brexit is already leading to fewer Europeans seeking work in London, a decline in confidence among businesses and a deceleration in house price growth. Many EU nationals are leaving the NHS following Brexit and employers' access to the EU labour market may be linked to the issue of skills shortages in the capital. This is particularly relevant to Tower Hamlets, because of The Royal London Hospital, one of the capital's leading trauma and emergency care centres. It is important, therefore, for Tower Hamlets to establish a Brexit Task Group in order to plan for a number of scenarios. Other boroughs have mentioned Brexit in their local plans. Hackney's Local Plan, for example, states: "For policies to be robust, they must reflect the current economic climate and be able to respond to future economic cycles going forward up to 2033, taking into account the impact of Brexit." (Challenges and Opportunities, point 1.6) At the Overview and Scrutiny Committee Meeting on 14 September 2017, I questioned why Brexit had not been mentioned in the plan. Councillor Blake responded: "I know that you – with the rest of us – are very concerned about the impact of Brexit in the borough. I'm sure you were campaigning just as hard as I was out on the doorsteps in Tower Hamlets to make sure we had a strong remain vote. Obviously, the plan coming forward is considering how the market will be affected and what kind of housing numbers we might expect, what kind of buildings we might expect to come forward and what kind of businesses we might expect to come forward. If there were to be significant change in the kind of offices and the kind of businesses that thrive in Tower Hamlets, I think that our plan would be flexible enough to accommodate that. We're already seeing a change in the kind of floorplate that people are demanding. We're seeing applicants coming forward with wanting to provide more self-workspace, so I think the plan's flexible enough to consider that."			The impact of Brexit on the borough is acknowledged in the plan (see chapter 6). Regular monitoring will be undertaken to assess the impact of changing circumstances on the effectiveness of Local Plan policies. Among the potential triggers include: - future economic downturns / cycles which may restrict the ability of developers or public bodies to provide housing or infrastructure; - changes in the availability of public funding – this may restrict the delivery of infrastructure or prevent some sites from coming forward

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1102564	Richard Hill	Thames Water Utilities Ltd	LP782	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			Dear Sir / Madam Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town and Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:				Comment noted
1053788	Steve Craddock	The Canal & River Trust	LP350	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A			The Trust's comments on the Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits' (Regulation 19) consultation are provided in two parts. We have submitted two representation forms that fully justify changes that we believe are needed to ensure that policies S.OSW1, S.OSW2 and D.OSW4 and the objectives for the Isle of Dogs and South Poplar in the plan are sound. This covering letter provides suggestions for how we believe that certain sections of the plan can be improved and highlights matters that we would like to see considered in implementation. The Trust is the guardian of 2,000 miles of historic waterways across England and Wales, of which approximately 100 miles are within our London Waterway. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". The Trust's waterways and waterspaces form a key part of the Blue Ribbon Network in Tower Hamlets. Within the Borough, we own and manage the Regent's Canal, the Limehouse Cut, Limehouse Basin, River Lee Navigation, Hertford Union Canal and the vast majority of the West India and Millwall docks within Docklands. We are also the Navigation Authority for the River Lee within Bow Creek. The Trust also owns land and properties with the borough. Our waterways, including the adjacent towpaths and dockside walkways, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where				Comment noted

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							Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. There are opportunities to improve the contribution that the waterways make to the sustainability and attractiveness of Tower Hamlets as a place to live, work and visit, particularly in areas where new development is planned. The Trust has comments to make on the following sections / policies of the draft Local Plan: • Chapter 3 – Creating Attractive and Distinctive Places • Chapter 4 – Housing • Chapter 6 – Revitalising our town centres • Chapter 7 – Supporting Community Facilities • Chapter 8 – Open Spaces • Chapter 9 – Protecting and managing our Environment • Chapter 11 – Improving connectivity and travel choice • Sub Area 1: City Fringe • Sub Area 4: Isle of Dogs Sub Area				
1143450	Thomson Reuters		LP939	PART 1: SETTING THE SCENE, 1.1 Paragraph	N/A		Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 19). We write on behalf of Thomson Reuters to the site known as Blackwall Yard. This site is allocated on Pages 251 - 253 of the draft Local Plan. Thomson Reuters occupy a significant commercial building on the site which forms part of their global data network. Thomson Reuters have achieved a number of alternative planning permissions for the redevelopment of the site and this remains the subject of ongoing review in the context of the operational needs of the business. In this context, we would suggest that the policies of the emerging Plan and allocation are adjusted to incorporate the following amendments discussed below. The site is located to the east of Canary Wharf on the northern bank of the River Thames, and falls within the allocated Blackwall cluster zone.				Comment noted

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671908		UKI (Fleet Street) Limited and UKI (Shoredit ch) Limited	LP883	PART 1: SETTING THE SCENE, 1.1 Paragraph	No				TOWER HAMLETS LOCAL PLAN 2031 (REGULATION 19) On behalf of our clients, UKI Shoreditch Limited (HiE) who are owners of the Huntingdon Industrial Estate, Bethnal Green Road, Shoreditch and UKI Fleet Street Hill Limited, who own the site at Fleet Street Hill, Shoreditch, we wish to make representations on the Regulation 19 Local Plan for the London Borough of Tower Hamlets. The representations are made pursuant to the following sections of the Local Plan:			Comment noted
635342	Aggregat e Industrie s UK Limited		LP486	PART 1: SETTING THE SCENE, 1.7 Paragraph	No	Effect ive; Consi stent with natio nal policy			The Introduction to the Local Plan should be clear from the outset what area it covers and how the Local Plan and Policies Map should be read. Required changes: Suggested additional text to be inserted between existing paras 1.7 and 1.8: "Part of the borough falls within the boundary of the London Legacy Development Corporation (LLDC). This area is detailed on the Policies Map. This Local Plan does not cover this area with the exception of waste matters and policies as detailed at Chapter 10. Local Plan designations shown within this area on the Policies Map or Figures within the Local Plan are provided for information purposes only and stem from the LLDC Local Plan which applies in this area."	Yes		Agree to suggested changes. Insert the following paragraph between paragraphs 1.7 and 1.8 in section 1: Part of the borough falls within the boundary of the London Legacy Development Corporation (as shown on figures 2 and 3). The Local Plan does not cover this area with the exception of waste matters, as detailed in chapter 10 in section 3. Local Plan designations within this area are shown on the Policies Map and key diagram and are identified in the London Legacy Development Corporation Local Plan which applies in this area.
635711	London Concrete Ltd		LP487	PART 1: SETTING THE SCENE, 1.7 Paragraph	No	Effect ive; Consi stent with natio nal policy			The Introduction to the Local Plan should be clear from the outset what area it covers and how the Local Plan and Policies Map should be read. Required changes: Suggested additional text to be inserted between existing paras 1.7 and 1.8: "Part of the borough falls within the boundary of the London Legacy Development Corporation (LLDC). This area is detailed on the Policies Map. This Local Plan does not cover this area with the exception of waste matters and policies as detailed at Chapter 10. Local Plan designations shown within this area on the Policies Map or Figures within the Local Plan are provided for information purposes only and stem from the LLDC Local Plan which applies in this area."	Yes		Agree to suggested changes. Insert the following paragraph between paragraphs 1.7 and 1.8 in section 1: Part of the borough falls within the boundary of the London Legacy Development Corporation (as shown on figures 2 and 3). The Local Plan does not cover this area with the exception of waste matters, as detailed in chapter 10 in section 3. Local Plan designations within this area are shown on the Policies Map and key diagram and are identified in the London Legacy Development Corporation Local Plan which applies in this area.
1105881	Michael Atkins	Port of London Authority	LP297	PART 1: SETTING THE SCENE, Chapter 2: Borough Portrait	No				Part 1: Setting the Scene, Chapter 2 Borough Portrait (page 16) The PLA welcomes recognition of the importance of the River Thames and the network of inland waterways as a natural asset in the borough.			Support welcomed
1105881	Michael Atkins	Port of London Authority	LP298	PART 1: SETTING THE SCENE, Chapter 2: Borough Portrait				Part 1: Setting the Scene, Chapter 2 Borough Portrait (page 16) The PLA welcomes recognition of the importance of the River Thames and the network of inland waterways as a natural asset in the borough.2.				Support welcomed

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1105881	Michael Atkins	Port of London Authority	LP299	PART 1: SETTING THE SCENE, Chapter 2: Borough Portrait				Part 1: Setting the Scene, Chapter 2 Borough Portrait (page 16) The PLA welcomes recognition of the importance of the River Thames and the network of inland waterways as a natural asset in the borough.				Support welcomed
1141974	Janice Boswell		LP26	PART 1: SETTING THE SCENE, 2.3 Paragraph	No				This does not reflect the current overdevelopment which is taking place on the Isle of Dogs which has seen the most in terms of new build homes, this is without due concern to the long standing residents who are seeing their homes being redeveloped and long standing communities living with the prospect of being split and divided. The Isle of Dogs has had the most redevelopment compared to all other areas of Tower Hamlets and the developers are still being allowed to build build build without infrastructure in place to deal with the enormous over population within such a very small area.			<p>Comment noted. The Isle of Dogs and South Poplar (including Canary Wharf) forms a key part of the Mayor of London's plans to transform the east of London, and its strategic importance to London and the economy as a whole is recognised in the London Plan. The Isle of Dogs and South Poplar is also designated as an opportunity area in the London Plan. Opportunity areas are defined as "the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport".</p> <p>The Isle of Dogs and South Poplar area has the potential to accommodate a significant amount of new homes and jobs along with other supporting facilities and infrastructure. The north of the Isle of Dogs is also an internationally and nationally important office location and complements the Central Activities Zone, alongside a range of town centre uses. In order to maximise these opportunities, the Local Plan seeks to focus growth and investment within the Isle of Dogs and South Poplar area, consistent with the London Plan and the objectives of the National Planning Policy Framework (see policy S.SG1).</p>
1054534	Angelic Interiors Limited	Angelic Interiors Limited	LP223	PART 1: SETTING THE SCENE, 2.4 Paragraph	Yes		AIL supports the approach set out in Policy S.SG1 that the majority of new housing and employment provision within the borough will be focused within the Isle of Dogs and South Poplar Opportunity Area.			Yes		Support is welcomed

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1054252	Londone wcastle	Londone wcastle	LP600	PART 1: SETTING THE SCENE, 2.4 Paragraph	No	Effective			This policy outlines that the majority of new development within the Borough will be directed towards the opportunity areas and highly accessible locations. This includes the City Fringe Opportunity Area which will also continue to act as a key focus for financial and business services. Section 3 of the policy notes that significant amounts of new housing will also be delivered in the City Fringe Opportunity Area. This is in accordance with the London Plan and is supported by our client in principle, although the opportunity to deliver growth elsewhere in the borough in areas outside of these designated opportunity areas should also be set out in the Local Plan. Section 7 of the policy notes that development will be required to support the delivery of significant new infrastructure to support growth within the four sub-areas including improvements to the transport network; green grid projects; and social infrastructure. Although this is acknowledged and supported in principle, the policy should identify that delivery may be funded through Community Infrastructure Levy or, where not part of the Council's Regulation 123 list, infrastructure could be funded through contributions where it is not appropriate, practical or viable to provide this on site. As a result, we do not believe the draft plan to be effective.			The Local Plan acknowledges in several places that the Community Infrastructure Levy is in place (see policies D.SG5, paragraphs 2.33, 2.37-44, 4.19-20, 7.9 and 10.23 and section 5) to help deliver infrastructure such as schools, open spaces and transport improvements to support development in the borough, thus giving clarity and guidance to developers on the council's approach to financial contributions. Further detail is set out in the Financial Contributions Supplementary Planning Document.
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP886	PART 1: SETTING THE SCENE, 2.4 Paragraph	No				Policy S.SG1: Areas of growth and opportunity within Tower Hamlets This policy seeks to direct new development within the Borough towards the opportunity areas and highly accessible locations. This includes the City Fringe OA which will also continue to act as a key focus for financial and business services. Biotech, life sciences and digital industries will be primarily concentrated in the City Fringe opportunity area (OA) to support the development of Tech City and Med City clusters. It is noted that significant amounts of new housing will also be delivered in the City Fringe opportunity area. The principle of focussing development within key areas such as the opportunity areas is in accordance with the London Plan (March 2016) and is fully supported. However, the Local Plan should still include clear encouragement of development opportunities and the importance that other sites outside of the opportunity areas can play in meeting targets for residential and employment. It is recognised that the borough's town centres will continue to be the focus of shopping, leisure, culture and community activities and will include a broad range of uses that are accessible to a significant number of people via foot, cycle or public transport. It is acknowledged that development will be required to support the delivery of significant new infrastructure to support growth within the four sub-areas including improvements to the transport network; green grid projects; and social infrastructure. Reference should			Comment noted. Add new paragraph after 2.11: While the majority of the borough's future housing and employment supply is expected to come forward on allocated sites, significant opportunities exist to bring forward development within other locations, such as small-scale infill sites within existing neighbourhoods and intensification of existing brownfield sites. These sites (known as windfalls) have the potential to make a significant contribution to the supply of housing and employment land in the borough.

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									be added to include the option for off-site delivery or contributions where it is not practical or viable to provide this on site.			
1105881	Michael Atkins	Port of London Authority	LP296	PART 1: SETTING THE SCENE, Figure 2 : Position of Tower Hamlets within the context of London and neighbouring areas	No				Figure 2: Position of Tower Hamlets within the context of London and neighbouring areas (page 13) The PLA consider that riverbus links and existing piers should be shown on this map, alongside the other main transport routes already shown.			Figure 2 sets out the position of Tower Hamlets within the context of London and neighbouring areas and only shows strategic transport infrastructure of regional significance. Piers and routes across the River Thames are already shown on figure 18: Strategic transport connectivity and also figure 38 in relation to the Isle of Dogs and South Poplar.
1142985	Transport for London (TfL)	Transport For London	LP722	PART 1: SETTING THE SCENE, Figure 2 : Position of Tower Hamlets within the context of London and neighbouring areas	N/A			▪ What is the methodology of highlighting stations? A number of other stations provide critical activities for the borough and should be highlighted, e.g. Canary Wharf Jubilee/DLR station ▪ The key growth areas do not marry with the narrative presented in Part 4.				All the lines shown on the map (figure 2) are of regional significance and all extend beyond London's boundaries. The borough's key transport nodes including stations are shown on figure 18 (strategic transport connectivity).
635854	Barts Health NHS Trust		LP231	PART 1: SETTING THE SCENE, 2.17 Paragraph	Yes		Delivering Sustainable Growth in Tower Hamlets We welcome the removal of the reference to infrastructure requirements that result from a development being mitigated on-site.			Yes		Support welcomed
624580	Jason Larkin	Canary Wharf Group Plc	LP500	PART 1: SETTING THE SCENE, 2.20 Paragraph	No	Justified			Para. 2.20 refers to One Canada Square in Canary Wharf as a "landmark of international importance" (alongside the Tower of London). In the Regulation 18 consultation, One Canada Square was described alongside the Tower of London as a "strategically important landmark". In Attachment 3 of the Regulation 18 consultation Representations, with reference to Policy DH3 – 'The Historic Environment' our heritage consultant Peter Stewart Consultancy had commented: "The Tower of London and One Canada Square are identified as a Strategically Important Landmarks in LBTH. If this implies that One Canada Square is considered to be a heritage asset, and that protection of views towards it will be comparable with those applied to the Tower of London, this is wholly inappropriate. Such an approach would not recognise			The cluster of tall buildings at Canary Wharf (including One Canada Square) is recognised in multiple strategic views within the London Views Management Framework (for example, from London Bridge, Tower of London, Greenwich, Southwark Bridge, Primrose Hill and Waterloo Bridge). One Canada Square forms the centrepiece of the district's cluster of tall buildings, known as the "skyline of strategic importance" in the Local Plan (see policy D.DH4: views). This skyline is one of the most recognised symbols of London. The height of the One Canada Square and the other buildings in the cluster is constrained because it lies within the flight permitted projection area

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								<p>the position of One Canada Square within a dynamic area and evolving tall buildings cluster, subject to almost continuous redevelopment over the last 30 years and with further substantial development likely for decades to come. More specifically, such an approach is not realistic about the effect of consented development, some of it under-construction, which would already have a substantial impact on visibility of One Canada Square and the overall form and pattern of development within the Isle of Dogs tall buildings cluster." This 'elevation' of One Canada Square to a landmark of international importance appears to be linked to a LBTH's objectives later on in the Draft Plan to restrict development heights at Canary Wharf. However, it is our view that ascribing such status to One Canada Square is a flawed approach which will ultimately harm growth within the borough. Attachment 3 provides Peter Stewart Consultancy's comments on the LBTH Tall Buildings Study 2017 evidence base document, a key point being (para. 1.2): "Our principal comment on the consideration of Canary Wharf in the strategy is that it is based on an outdated idea of the area and its character. While the strategy is correct to identify One Canada Square as an important focal point, there is no attempt to suggest what its role could be in the context of an expanding cluster that will soon include several buildings that are of a similar height to it, and with many more such buildings consented. As a result, the emphasis is on attempting to retrospectively maintain the centrality of One Canada Square and enforce a rigid stepping down in heights from it - a situation which in practice is already in the process of being superseded" Whilst One Canada Square may be internationally recognised, to say that it is a landmark of international importance in the same category of the Tower of London (a UNESCO world heritage site) cannot be justified Para. 2.20 should be amended accordingly to make it sound: "Some of these buildings are landmarks of international importance, DELETE <including> INSERT <such as > the Tower of London (a UNESCO world heritage site)DELETE <and> INSERT <. Others are internationally recognised such as> One Canada Square in Canary Wharf. DELETE <Other > Notable historic buildings include the medieval parish church of St Dunstan (which predates the Tower of London) and the high-tech, former Financial Times Print Works (constructed in the late 1980s)."</p>			<p>of London City Airport (Civil Aviation Agency). The silhouette is also recognised in multiple borough designated views (3-6) as shown on figure 13: Key view, landmarks and the skyline of strategic importance. One Canada Square is not, however, nationally or locally designated, while further tall buildings in this area will clearly have a noticeable impact on the skyline, this cluster (including One Canada Square) will still be visible from a number of vantage points to the west, north, south and west, as identified above. The image of One Canada Square is recognised as a symbol of London's role as a progressive and global city, reflecting both the strategic development objectives of the borough and London as a whole.</p>

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829908	Andrew Wood		LP68	PART 1: SETTING THE SCENE, Figure 4 :24 places of Tower Hamlets	No	Justified			These place may look nice and neat on a map but do not reflect how and where people think they live Canary Wharf is bigger in real life Nobody in Leamouth calls it Leamouth, they say they live at London City Island Blackwall stops at Billingsgate The docks divide Millwall from Cubitt Town Most people in Island Gardens ward say they live in island Gardens which does not exist These areas also do not reflect types of development i.e. there is a stretch of development from Canary Riverside in the west to London City Island in the east which are homogenous in terms of scale and density but according to this map form part of different areas. It is also confusing as we use political wards for some subjects and Local Area Partnerships for others, this adds a third level which we do not use elsewhere in LBTH	Yes		Comment noted but ward boundaries are not strictly a planning matter
1105881	Michael Atkins	Port of London Authority	LP309	PART 1: SETTING THE SCENE, Chapter 3: Trends	N/A			3. Part 1: Setting the Scene, Chapter 3 Trends (pages 18-20) On the summary of emerging trends presented by the council, the PLA have the following comments • Our Infrastructure: The PLA welcomes recognition of the role of improved river services and additional river crossings in improving the public transport network. This is in accordance with the PLAs Thames Vision to increase the number of people travelling by river. • Our Local Economy: The PLA welcomes the reference to the need to safeguard industrial land. It is important that new development taking place in the vicinity of safeguarded wharves does not adversely affect their existing or future operation. There are two safeguarded wharves in Tower Hamlets – Northumberland Wharf and Orchard Wharf – and a number on the South side of the river which also have the potential to affect residents of new development in Tower Hamlets. • Our Environment: The PLA welcomes the recognition of the need for improvements to transport links in the borough. The PLAs Thames Vision includes reference to the need for new river crossings to the east of Tower Bridge, the need to make more efficient use of piers, proposed new piers and joining up the Thames Path from source to sea.			Support welcomed	
1033272	James Stevens	Home Builders	LP785	PART 1: SETTING	N/A			It would be very helpful if the Local Plan set out on the front cover the				Comment acknowledged. The title page will be amended. 2031 will be replaced with

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		Federati on Ltd		THE SCENE, 3.1 Paragraph				plan period – i.e. 2016 – 2031.				"2016-2031"
1141904	Mark Furnish	Sport England	LP17	PART 1: SETTING THE SCENE, 3.1 Paragraph	No	Justifi ed			The 'Our Infrastructure' section states that states that in order to meet growth needs sets out specific requirements including “a number of new publicly accessible open spaces and sport halls.” This not specific and express what is required based on an up-to-date and robust strategy for indoor and outdoor sport facilities. The strategies cited as the evidence base have not been robustly prepared nor have provided specific strategies for indoor sports provision or outdoor sports provision, including playing field. This can be supported since there is a lack of clarity of what is required stated within this box. Sport England is concerned that the health demand of the borough's residents would be addressed and therefore the Council would not be able to achieved its aims of improving health and wellbeing as stated throughout this document. In order to make the Local Plan sound the Council must develop a Local Plan that is based on up-to-date an robust strategies that have been developed with stakeholders including Sport National Bodies and Sport England that sets out what actions are required and where that would guide the Council to meet the sport demand during the plan period. At present the strategies have not been developed with such standards and/or to align with recognised guidance, such as the Playing Pitch Strategy Guidance.	Yes		The Playing Pitches Assessment includes an assessment of the borough’s playing pitches and outdoor sports facilities following Sport England’s Playing Pitch Strategy Guidance. The findings of the assessment, which has been reviewed and agreed by all NGBs, have been used to inform part E of the Open Space Strategy. The Open Space Strategy includes an overarching action plan, also containing high level actions relating to outdoor sport facilities. The Indoor Sports Facilities Strategy includes assessment of the borough’s indoor sports facilities and specific strategic options and objectives. Given the significant level of overall open space deficiency in Tower Hamlets and the competing demands on the borough’s open spaces (including playing pitches), the Open Space Strategy takes a more holistic approach that considers all open space needs, including space for outdoor sports. Embedding considerations for outdoor sports in the Open Space Strategy allows multiple demands on the borough’s limited open spaces to be balanced more effectively in a very diverse and densely populated borough like Tower Hamlets. In addition, based on these strategies, the Infrastructure Delivery Plan provides an assessment of the current supply and future need for indoor sport facilities and outdoor sport facilities and playing pitches and identifies specific projects to help address this need. Furthermore, a more detailed action plan has been prepared based on the findings of the Playing Pitches Assessment and will be incorporated into the next update to the Infrastructure Delivery Plan. On this basis, it is considered that the Local Plan provides an adequate framework for sustainable planning for indoor and outdoor sport facilities, including playing pitches.

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1142985	Transport for London (TfL)	Transport For London	LP724	PART 1: SETTING THE SCENE, 3.1 Paragraph	N/A			<ul style="list-style-type: none"> This section, as well as the wider document, contains a number of strong statements regarding transport capacity, yet are not clearly referenced with evidence or explicit interventions provision. The borough will receive a step-change in transport capacity in the coming years, but this is not clearly acknowledged in the plan. 				<p>Tower Hamlets has the highest growth targets in London. Our evidence suggests that the borough has the potential to deliver an additional 125,000 jobs and 58,965 new homes by 2031.</p> <p>Our transport systems need a step change to enable this to happen, improving regional connectivity, particularly through the new Elizabeth line and improvements to DLR, tube and overground services, and through improving and integrating local transport systems. However, even with these planned improvements, the borough will still require additional transport capacity to meet the future needs arising from this growth and help achieve this step change (as evidenced in the Tower Hamlets Strategic Transport Assessment).</p>
1130948	Adam Price	Transport for London	LP287	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	No				<p>Consultation on the Tower Hamlets Local Plan 2031 (Regulation 19) Thank you for providing us with the opportunity to comment on the proposed submission version of the Tower Hamlets Local Plan 2031. The following comments represent the views of officers in Transport for London Commercial Development Planning Team (TfL CD) in its capacity as a significant landowner only and do not form part of the TfL corporate response. Our colleagues in TfL Borough Planning will provide separate comments regarding TfL-wide operational and land use planning/transport policy matters as part of their statutory duties. The Mayor of London has a priority to deliver additional homes throughout London and in particular boost affordable housing provision. As a public landholder, TfL has a crucial role to play in this delivery. However, this must also be balanced with the need to raise capital receipts and revenue to invest in the public transport network. TfL's landholdings in the borough are considerable and whilst we appreciate that the Regulation 19 stage of the consultation calls for comments on the legality and soundness of the Local Plan, we would like to take this opportunity to comment on a number of matters, as outlined below.</p> <p>Vision and objectives We broadly welcome the principles and objectives of this document, setting out the Council's Vision and recommended uses for future development sites. Good growth principles are very much common objectives of the borough and Transport for London and we would therefore like to continue working closely with you to achieve these goals going forward. We support the plan's reference to the direction of growth in the City Fringe, the Lower Lea Valley and Isle of Dogs and South Poplar areas, as well as at key locations along transport corridors. The latter reference very much accords with the draft</p>			Support is welcomed

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									Mayor's Transport Strategy (MTS) which sets out that land around stations provides the opportunity to create high density development and such an approach should be fully explored. This also reflects existing London Plan Policy 2.8 (i) which sets out that the Mayor will maximise the development opportunities supported by the Crossrail project.			
624580	Jason Larkin	Canary Wharf Group Plc	LP501	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	No	Justified			We reiterate our support for those parts of the Vision which make reference to Tower Hamlets' embracing its role as a key focus for London's growth, making best use of the economic benefits from Canary wharf, the City of London and Stratford. We agree that growth should be primarily delivered in areas like the Isle of Dogs, although it is disappointing that the Vision is less ambitious than at the Regulation 18 stage where Tower Hamlets was to embrace its role as "the focus for London's growth" [our emphasis]. This should be reinstated. We also note a further change to the Vision since the Regulation 18 stage. The Regulation 18 document stated: "The strategic role of Canary Wharf and the City Fringe will be supported" Whereas the equivalent reference in the Regulation 19 document is: "The strategic roles of Canary Wharf as a global financial and business hub and the City Fringe and Whitechapel as emerging hubs for life sciences, bio-tech and digital industries will be strengthened." There is an implication from this change in wording that non-employment related uses, such as residential, will be viewed less favourably by the Council at Canary Wharf. As will be explained in more detail below, it would be wrong to dismiss housing as an important and necessary use to be supported at Canary Wharf. We would question elements of the following principle of 'Key Objective 2: Sharing the benefits of growth' (which was worded differently in the Regulation 18 Consultation): "Growth must deliver social, economic and environmental net gains jointly and simultaneously and reduce inequalities, benefitting the lives of existing Residents." In order to be justified, the Council need to explain what these "net gains" are and how they can be measured. There is no acknowledgement that Community Infrastructure Levy (CIL) is in place which will provide the infrastructure the Council has identified is required. Aside from site specific mitigation associated with individual schemes, it is unclear what further the Council is or can seek from proposed development.			Support for the vision is welcomed. Tower Hamlets will play a key role in contributing towards London's strategic needs. The London Plan makes it clear that the Central Activities Zone (CAZ) and opportunity areas will be the focus for London's growth. Tower Hamlets has three opportunity areas (Isle of Dogs & South Poplar, City Fringe and Lower Lea Valley) and contains parts of the CAZ. In this respect, Tower Hamlets will seek to embrace its role as a key focus for London's growth. No change. The London Plan states that "The north of the Isle of Dogs forms a strategically significant part of London's world city offer for financial, media and business services and is recognised as part of the CAZ for office policy purposes, with Canary Wharf also functioning as a major town centre for its workers and more local communities". The vision of the Local Plan reflects this statement in seeking to promote the strategic role of Canary Wharf as a financial and business hub. Residential uses are also permitted in this location as part of mixed-use development. No change. Key objective 2 reflects the government's definition of sustainable development set out in the NPPF: "Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three" (paragraph 152). In this context, development and other activities should result in positive improvements to the quality of the environment as well as improve economic and social opportunities and in turn contribute to the principles of sustainable development. A number of the policies in the plan outline how these 'net gains' can be achieved (for example, through the restoration and enhancement of wildlife habitats; widening the choice and range of affordable homes; improving the quality of the urban environment through better

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											quality design etc). No change. The Local Plan acknowledges in several places that the Community Infrastructure Levy is in place (see policies D.SG5, paragraphs 2.33, 2.37-44, 4.19-20, 7.9 and 10.23 and section 5) to help deliver infrastructure such as schools, open spaces and transport improvements to support development in the borough, thus giving clarity and guidance to developers on the council's approach to financial contributions.
1141834	Peter Marsden		LP618	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	N/A		We believe that the Tower Hamlets should be strengthened to reflect the Borough's commitment to preserving and managing heritage assets to the best effect and for the longer term benefits for the local community. We therefore recommend that Section 1.1 para 5 be reworded as follows: Neighbourhoods will be transformed with high quality buildings and well-designed spaces, while the character of the borough's 24 places that make Tower Hamlets unique, INSERT < including its cultural heritage,> will be protected and enhanced: ensuring a sensitive balance between, and integration of, old and new. High standards of environmental sustainability will result in improvements in air quality, carbon emissions, recycling and climate change mitigation. Innovative and smart technology will enhance the provision of services. This will ensure the on-going social and environmental sustainability of greater levels and higher densities of development.				Comment noted. Paragraph 1.1 of the vision will be reworded as follows: Neighbourhoods will be transformed with high quality buildings and well-designed spaces, while the character of the borough's 24 places that make Tower Hamlets unique, including its cultural heritage, will be protected and enhanced: ensuring a sensitive balance between, and integration of, old and new
1142548	Grafton Group PLC	Grafton Group PLC	LP424	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	Yes	We support the overarching vision for the borough including the identification of the Lower Lea Valley, Isle of Dogs and South Poplar as one of the areas where growth will primarily be delivered.					Support is welcomed and comment is noted

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1033284	Unknown	One Housing Group	LP388	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	N/A			Vision and objectives One Housing welcomes the Vision, which states that existing communities will be supported and new residents will be welcomed to make their home within livable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life and more healthy lifestyles. The recognition in the Vision that growth will be primarily delivered in the City Fringe, the Lower Lea Valley and the Isle of Dogs and South Poplar and at key locations along transport corridors is supported. Key Objective 1 seeks to manage growth and shape change. One Housing supports the implementation of this key objective through points 1-14, with particular support for points 1 and 2: § 1: Delivering the Borough's role as a key location for London's housing and employment growth, while seeking to overcome constraints to sustainable growth through regional and national investment prioritisation; and, § 2: Positively meeting our duties to deliver our strategic and local housing needs, linked to effective infrastructure planning and delivery. Key objective 2 seeks to share the benefits of growth. One Housing supports the implementation of this key objective through points 1-9, with particular support for points 1, 3 and 6: § 1: Reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through optimising regeneration opportunities, in particular in the Lower Lea Valley, Isle of Dogs and South Poplar; § 3: Ensuring housing development contributes to the creation of socially balanced and inclusive communities and offers housing choice, reflecting our priorities for genuinely affordable and family homes; and, § 6: Creating buildings, streets, spaces and places which promote social interaction and inclusion, which are accessible to all and which people value, enjoy and feel safe and comfortable in. Whilst One Housing supports these			Yes		Support is welcomed

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								objectives, it is important that the Local Plan policies are sufficiently positive to ensure that they can be delivered.				
1142556	Regal London	Regal London	LP461	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	Yes		We support the overarching vision for the borough including the identification of the Lower Lea Valley, Isle of Dogs and South Poplar as one of the areas where growth will primarily be delivered.					Support is welcomed
1143324		Resolution Property plc	LP809	PART 2: VISION AND OBJECTIVES , Chapter 1: Our vision for Tower Hamlets	Yes		Tower Hamlets is uniquely placed in London to act as a focus for growth and any new local plan must recognise and reflect this in its ambition. We are pleased to note that this sentiment is captured in the emerging Local Plan and would expect all decisions on policy direction to be framed and taken in this context.			Yes		Support welcomed

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1049340	Ruth Bravery		LP830	PART 2: VISION AND OBJECTIVES , 1.1 Paragraph	No	Positi vely prepa red			In preparing the plan I consider that LBTH have paid insufficient attention to the magnitude of development. The plan acknowledges that the expected increase in population will be like fitting a city the size of Bath (and all its related infrastructure needs) into one of the most densely populated areas of the U.K. I believe this is the biggest, most significant and most challenging pieces of development in the UK, if not Europe. Adding to this complexity is the fact that this is not a typical geographic location with 360 degree access; in the case of the Isle of Dogs, where the greatest amount of development is expected, this small area is almost entirely bound by water. I consider the way the plan envisages achieving this hugely complex development task is to identify a couple of dozen locations for schools, libraries and healthcare and pretty much leave everything else to the chance of the free market. I do not consider this rather mechanistic approach is adequate for the monumental scale and complexity of the anticipated change. What the scale demands is a similarly significant, ambitious and unusual response that measures up to the anticipated scale of development. It needs a clear, strong, well articulated vision of place making that is much deeper, detailed and more developed than the current set of neighbourhood zones set out in the document. A plan similar in nature to those developed for garden cities would be much more appropriate, where "chance" and free market forces are given much more direction and appropriately corralled. Leaving chance to work out how to fit "the quart into the pint pot" is literally going to result in a mess. It needs clever, innovative, out of the ordinary thinking.	Yes		Comment noted. The Local Plan sets out place-making principles which will guide development and growth in key growth areas. Alongside these a number of other tools such as masterplans and other area specific plans (e.g. neighbourhood plans) will be used to articulate the emerging vision and design parameters in more detail at the neighbourhood and site specific level (see section 5: paragraphs 1.7,1.8, and 3.4). The Mayor of London is also preparing an opportunity area development framework to guide development and renewal within the Isle of Dogs and South Poplar area.
1053309	Jane Wilkin	Environ ment Agency	LP249	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles				Thank you for consulting us on the above policy document. We have reviewed the plan and relevant evidence bases and find the plan to be positively prepared and sound in relation to the Environment Agency's remit. I attach our formal response form with some suggestions to strengthen and improve some aspects of the plan. Generally we are pleased that the majority of our comments have been taken on board and the policies are based on appropriate evidence base.			Support is welcomed.	
1142399	Nick Pope	Nike Pope Design	LP248	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and	No				SEE COMMENTS I'm writing regarding the plan for 2031 and have these comments. The comments are specifically relating your points on Page 22 7. strengthening the role of our town centres to encourage a broad range and mix of uses and activities and meet the needs of users; 9. protecting the uses, spaces and places, including parks and waterways,	Yes		Comment noted. Creating a more unique and attractive borough that respects the heritage and distinctiveness of its individual places is one of the key cross cutting themes running through the Local Plan.

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				principles					<p>which make the borough unique; You also lead with the points on a borough "Steeped in a rich and varied history, Tower Hamlets is blessed with substantial areas of historic and architectural interest, including 58 conservation areas (which cover around 30% of its total area) and over 2000 listed buildings, with great variation in character and size."With the new guide I hope it aims at building something we can really be proud of that stands the test of time and is something that will be valued by future generations. Tower Hamlets talks about the rich diverse and creative industries it contains, yet it feels rare any of this is actually the starting point for many recent developments. Too many soulless blocks are going up without the thought of local infrastructure, social and community spaces and units for current or new local businesses and industry. How does this address current or future Town Centre locations within the borough? When talking about the plan for 2031, the council needs to address its role in the negative development that fills the borough. Poorly thought out planning decisions taken in the 60s/70s through to today, that have not only hindered development, but actually acerbated issues such as poverty, crime and are difficult to 'regenerate' without huge investment or total demolition. New developments cannot simply be the same ideas used in the post-war eras just with new, bright plastic cladding that will date as badly as some of the developments before it. The risk investment and development can bring to an area. It can mean the demolition of locally loved landmarks, historic buildings that are part of a community but also the removal of whole communities and existing tenants as these new areas are planned by companies with no real connection to the area. Integration of estates into street level development. Re-looking at estates and how the fit in to the street scape. How they work with existing street pattern. People like 'streets', active frontages and clear paths that are well lit for safety. It would be good if a real effort is made in how developments and areas may change over the future decades. How do these buildings respond to change? Many victorian buildings have allowed piecemeal, bit by bit regeneration that improves areas over time. Large blocks of development and estates, do not allow that. The most successful regenerations of areas have no taken place because of considered action by the council. They've happened organically through the small scale opportunities previous scales of buildings. How do new developments respond to this? How to give an opportunity to landlords and landowners to improve their land and buildings. The condition of older/historic buildings says so much more about an area than the new buildings within it. It would be such a short sighted mistake to lose sight of</p>			

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									<p>the value of these buildings and what the refurbished buildings could offer to the area. The concept of simply knock it down. Build new because it's 'new' and 'better' is a mentality that belongs in the 1960s I hope the council will take note from the huge regeneration projects around London such as in Kings Cross which are taking a lead from their history and using that as the basis for new development - Celebrating and restoring what is there. This approach will help make Tower Hamlets a Vibrant destination to visit and for people to live in especially when new developments are sited near historic areas. Currently tax incentives offer mainly benefits if buildings are demolished. We should be encouraging owners to refurbish and maintain their buildings - tax incentives or local schemes set up by the council could address this. London has such a rich and varied design heritage and is a global leader for design, we should champion this more in our borough to create a unique borough we can be proud of! Creating of Heritage Action Zones Areas, different to just conservation areas, that require more intentional building and street scape design. For example historic streets in west London maintain cobbled streets and attractive traditional shopfronts on buildings to a level not seen in Tower Hamlets. How to make our streets 'attractive' should always be considered. What's suitable for a modern new street doesn't always apply to streets with many Victorian buildings. Ensuring development within these areas is considered and relevant to context, materiality, detail and creates an interesting composition with existing buildings Identify historic areas not currently utilised. For example, Cook's Yard in Whitechapel - a historically interesting area and could be regenerated in a way such as Covent Garden - especially taking into account the development of Whitechapel. There are countless under utilised historic buildings that are poorly maintained or with unsympathetic new additions (shopfronts, glazing etc). Addressing these actually makes our borough look better, work better by offering better looking businesses and creates a sense of civic pride which is so important. There's so much potential in our built environment and so much that could be done. I hope addressing some of these issues within your plan.</p>			
1141834	Peter Marsden		LP624	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles	N/A			We believe that the importance of the cultural heritage should be recognised as a part of the key principles. We recommend that bullet point 5 be reworded as follows: • Growth must respect, protect and enhance our INSERT <cultural and natural> environment and our health and well-being. An important facet of managing growth and shaping change			No change. These principles are very high level and set the broad context through which the actions will be implemented, covering all aspects of the borough's environment (including its cultural heritage). Moreover, the implementation actions (in particular bullet point 10) recognise the importance of the cultural heritage. A number of the principles and actions under the objectives are relevant to	

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								is the careful management of increasing developer-led aspirations for new development involving tall buildings which have a significant impact in terms of place making. This should be reflected in the way in which Key objective 1 is implemented. We therefore recommend that implementation point 10. be reworded as follows: 10. delivering successful place making which conserves heritage assets and their settings; enhances local distinctiveness, character and townscapes; INSERT <takes account of the impact of tall building development on the character of the area and on views and vistas>;				the consideration of tall buildings. The Local Plan already gives sufficient coverage to the impacts of tall buildings development on local character and views and vistas (in particular chapter 2 in section 3). In particular, policy D.DH6 sets out a series of principles that will inform the scale, design and location of tall building development in the borough.
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP942	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles	No				Part 2: Vision and Objectives Key objective 1: Managing the growth and shaping change We support the draft key objectives of the Local Plan but it is important to ensure that it is precise in its use of language to ensure its objectives cannot be misunderstood. In order therefore to provide greater clarity on the principles and objectives, we propose the following text amendments (in red text) to the 2nd and 3rd principle, and point 6 of the objective implementation strategy: - Growth must be delivered alongside INSERT <appropriate> social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. - INSERT <When taken as a whole>, growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. INSERT <Individual developments will contribute to these holistic aims in a manner appropriate to each individual . Whilst some schemes will be mixed uses, not every site will deliver every land use>. 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities,INSERT <intensification>, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places; In addition to the above, we suggest that the policy wording incorporates all existing and proposed transport infrastructure investments which have the potential to act as a catalyst for investment, growth and delivery. Our suggested text amendments to point 7 of the objective implementation strategy are set out below: 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf; INSERT <and wider transport infrastructure investments (e.g. DLR improvements)> , acting as a catalyst for investment;			Support is welcomed but agree to the following amendments (apart from the reference to individual developments which will be assessed and evaluated on a case by case basis, as per the regulations). Key objective 1: Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. When taken as a whole , growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Amend key objective 2: 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification , integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places. 7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) and wider transport infrastructure investments , acting as a catalyst for investment;

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1142590		British Airways plc	LP472	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles	N/A			We propose the following text amendments to objective 7 of Key Objective 2 (Sharing the benefits of growth Principles) in order to incorporate all existing and proposed transport infrastructure investments which have the potential to act as a catalyst for investment, growth and delivery: · 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf; INSERT <and wider transport infrastructure investments e.g. DLR improvements>, acting as a catalyst for investment; We support the draft key objectives of the Local Plan but it is important to ensure that it is precise in its use of language to ensure its objectives cannot be misunderstood. In order therefore to provide greater clarity on the principles and objectives we propose the following text amendments to the principles and objective 6 of Key Objective 1 (managing the growth and shaping change): · Growth must be delivered alongside INSERT <appropriate> social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. · INSERT <When taken as a whole>, growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. INSERT <Individual developments will contribute to these holistic aims in a manner appropriate to each individual site. Whilst some schemes will be mixed uses, not every site will deliver every land use.> 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, INSERT <intensification>, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places;				Support is welcomed but agree to the following amendments (apart from the reference to individual developments which will be assessed and evaluated on a case by case basis, as per the regulations). Key objective 1: Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. When taken as a whole , growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Key objective 2: 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification , integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places. 7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) and wider transport infrastructure investments , acting as a catalyst for investment;

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1142548	Grafton Group PLC	Grafton Group PLC	LP425	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles	N/A			Key Objective 1: Managing the growth and shaping change We broadly support the principles of this objective and the identified implementation strategy. We fully support the focus on housing and employment growth and the intention to seek to make the best use of available land,including through the co-location of uses in order to optimise redevelopment opportunities. Key Objective 2: Sharing the benefits of growth We broadly support the principles of this objective and the identified implementation strategy. We welcome the objective of optimising regeneration in the Lower Lea Valley, Isle of Dogs and South Poplar area.				Support welcomed
1142556	Regal London	Regal London	LP462	PART 2: VISION AND OBJECTIVES , Chapter 2: Key objectives and principles	N/A			Key Objective 1: Managing the growth and shaping change We broadly support the principles of this objective and the identified implementation strategy. We fully support the focus on housing and employment growth and the intention to seek to make the best use of available land,including through the co-location of uses in order to optimise redevelopment opportunities. Key Objective 2: Sharing the benefits of growth We broadly support the principles of this objective and the identified implementation strategy. We welcome the objective of optimising regeneration in the Lower Lea Valley, Isle of Dogs and South Poplar area.				Support welcomed
1142035		Hermes Property Unit Trust	LP147	PART 2: VISION AND OBJECTIVES , 2.1 Paragraph	Yes			We support the Vision and Objectives set out in Key Objective 1, although we consider that the Vision must be tempered against viability and market led/commercial consideration that guide the delivery of development. Moreover, we consider that the forthcoming consultation on the new London Plan (expected late November 2017) should play an important role in defining the direction of planning policy for Tower Hamlets, and indeed ALL Boroughs. Given this, it would be helpful to understand how the proposed policies contained within the Plan relate to the aforementioned		Yes		Your support is welcomed. Although the London Plan is still at consultation stage, the policies in the Local Plan appear to be broadly aligned with those within the emerging London Plan.

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								emerging London Plan.				
1143324		Resolution Property plc	LP814	PART 2: VISION AND OBJECTIVES , 2.1 Paragraph	No	Effective			We support the draft key objectives of the Local Plan but in order to provide greater clarity on the principles and objectives we propose the following text amendments to the principles and objective 6 of Key Objective 1 (managing the growth and shaping change):"Growth must be delivered alongside insert <appropriate> social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. Insert <When taken as a whole> growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, insert <intensification,> integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places; In addition to the above, we propose the following text amendments to objective 7 of Key Objective 2 (Sharing the benefits of growth principles): 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf; insert <and wider transport infrastructure investments e.g. DLR improvements>, acting as a catalyst for investment;	Yes		Support is welcomed but agree to the following amendments (apart from the reference to individual developments which will be assessed and evaluated on a case by case basis, as per the regulations).: Key objective 1: Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. When taken as a whole , growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Key objective 2: 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification , integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places. 7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) and wider transport infrastructure investments , acting as a catalyst for investment;
1130948	Adam Price	Transport for London	LP288	PART 2: VISION AND OBJECTIVES , 2.4 Paragraph	No				Policy S.SG1: Areas of growth and opportunity within Tower Hamlets We broadly support this policy objective, which seeks to direct new development within the borough towards: "the opportunity areas (City Fringe, Lower Lea Valley and Isle of Dogs and South Poplar); and/or b. highly accessible locations along transport corridors." However, it should be acknowledged that growth will also need to be accommodated in other areas across the borough, including on both allocated and windfall sites as they become available.			Comment noted. A new paragraph will be inserted after 2.11: While the majority of the borough's future housing and employment supply is expected to come forward on allocated sites, significant opportunities exist to bring forward development within other locations, such as small-scale infill sites within existing neighbourhoods and intensification of existing brownfield sites. These sites (known as windfalls) have the potential to make a significant contribution to the supply of housing and employment land in the borough.
1143353	Greenland Hertsmer e (London) Ltd		LP857	PART 2: VISION AND OBJECTIVES , 2.4 Paragraph	N/A			We support the draft key objectives of the Local Plan but it is important to ensure that it is precise in its use of language to ensure its objectives cannot be misunderstood. In order therefore to provide greater clarity				Support is welcomed but agree to the following amendments (apart from the reference to individual developments which will be assessed and evaluated on a case by case basis, as per the regulations).

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							<p>on the principles and objectives, we propose the following text amendments (in red text) to the 2nd and 3rd principle, and point 6 of the objective implementation strategy:</p> <ul style="list-style-type: none"> · Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. · When taken as a whole, growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Individual developments will contribute to these holistic aims in a manner appropriate to each individual site. Whilst some schemes will be mixed uses, not every site will deliver every land use. 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places; In addition to the above, we suggest that the policy wording incorporates all existing and proposed transport infrastructure investments which have the potential to act as a catalyst for investment, growth and delivery. Our suggested text amendments to point 7 of the objective implementation strategy are set out below: 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf; and wider transport infrastructure investments (e.g. DLR improvements), acting as a catalyst for investment; 				<p>Key objective 1:</p> <p>Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported.</p> <p>When taken as a whole, growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development.</p> <p>Key objective 2:</p> <p>6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places.</p> <p>7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) and wider transport infrastructure investments, acting as a catalyst for investment;</p>

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1142716	Lyca Group		LP641	PART 2: VISION AND OBJECTIVES , 2.5 Paragraph	Yes		Tower Hamlets is uniquely placed in London to act as a focus for growth and any new local plan must recognise and reflect this in its ambition. We are pleased to note that this sentiment is captured in the emerging Local Plan and would expect all decisions on policy direction to be framed and taken in this context. Part 2: Vision and Objectives Key objective 1: Managing the growth and shaping change We support the draft key objectives of the Local Plan but it is important to ensure that it is precise in its use of language to ensure its objectives cannot be misunderstood. In order therefore to provide greater clarity on the principles and objectives, we propose the following text amendments (in red text) to the 2nd and 3rd principle, and point 6 of the objective implementation strategy: · Growth must be delivered alongside insert <appropriate> social and transport infrastructure,					Support is welcomed but agree to amend the following key objectives (apart from the reference to individual developments which will be assessed and evaluated on a case by case basis, as per the regulations): Key objective 1: Growth must be delivered alongside appropriate social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported. When taken as a whole , growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Key objective 2: 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, intensification , integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places. 7. maximising the benefits of the new Elizabeth line (including the stations at Whitechapel and Canary Wharf) and wider transport infrastructure investments , acting as a catalyst for investment;

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							<p>recognising that without provision of adequate infrastructure growth cannot be supported. ·Insert >When taken as a whole,> When taken as a whole,> When taken as a whole, growth must be balanced, containing a range of employment, retail and community facilities, alongside increasing residential development. Insert <Individual developments will contribute to these holistic aims in a manner appropriate to each individual site. Whilst some schemes will be mixed uses, not every site will deliver every land use. Insert> 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, insert <intensification>, integrated infrastructure and the delivery of pocket parks) and ensuring improved connectivity between places; In addition to the above, we suggest that the policy wording incorporates all existing and proposed transport infrastructure</p>					

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							investments which have the potential to act as a catalyst for investment, growth and delivery. Our suggested text amendments to point 7 of the objective implementation strategy are set out below: 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf; insert <and wider transport infrastructure investments (e.g. DLR improvements),> acting as a catalyst for investment;					
1105881	Michael Atkins	Port of London Authority	LP305	PART 2: VISION AND OBJECTIVES , Figure 5 :The key diagram	N/A			PLA HAVE NOT SAID THE PLAN IS UNSOUND BUT HAVE REQUESTED THE FOLLOWING: 5. Figure 5: Key Diagram (page 26) The PLA requests that the boroughs two safeguarded wharves, Orchard Wharf and Northumberland Wharf are both included on the key diagram, emphasising their status in line with policy 7.26 of the 2016 London Plan on increasing the use of the Blue Ribbon network for freight transport.				Comment noted. The existing wharfs/depots (as shown on figure 18: strategic transport connectivity) are strategically located to serve London wide freight needs along the River Thames but are under increasing pressure from housing and other uses, and hence the Local Plan is seeking to safeguard them from inappropriate development. The key diagram shows strategic infrastructure and therefore will be amended to indicate the location of the safeguarded wharfs.

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1033229	Paul Burley	Montagu Evans LLP	LP39	PART 2: VISION AND OBJECTIVES , Figure 5 :The key diagram	No	Justified			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Key Diagram As in our previous representations, if the intention is to show the interrelationship between principal spatial designations, this should not be done on a geographic base – it must be wholly diagrammatic. Any expression of the geographic extent of designations should be restricted to the Policies / Proposals Map. Confusion may arise, for example, where an indicative location for 'MedCity' is illustrated yet individual buildings within a town centre are shaded. We support the indicative illustration of 'MedCity'. We continue to object to the illustration of the 'Green Spine' in Whitechapel for the reasons set out in our representations to the Regulation 18 draft of the emerging local plan, in particular the absence of a draft local plan policy that identifies the land that would be needed to effect the delivery of such an open space or a clear mechanism setting out how such an open space could be delivered. As we noted previously, to achieve its purpose the 'Green Spine' must be deliverable in its totality. The intention was to connect Whitechapel Road and Commercial Road. The Regulation 19 draft local plan now no longer shows the Green Spine notation connecting to Whitechapel Road and so it appears that a Green Spine is not achievable. If that is the case then the Council ought to be less prescriptive about the form of open space that it would like to see brought forward in the Whitechapel South area. We have also made comments on this matter in relation to the proposed site allocation (see below).	Yes		Support for the Med City is welcomed. However, the maps are for illustrative purposes only. The geographic extent of the designations and sites are set out in the Policies Map. No change. Landowners and developers will need to work together to ensure that the Green Spine can be delivered in a comprehensive manner in line with the principle set out in the Local Plan. Figure 26: Whitechapel South identifies the broad indicative location of the Green Spine from Philpott Street to Whitechapel Road in line with the Whitechapel Masterplan Vision.
1142985	Transport for London (TfL)	Transport For London	LP725	PART 2: VISION AND OBJECTIVES , Figure 5 :The key diagram	N/A			<ul style="list-style-type: none"> Rotherhithe – Canary Wharf – This is a new pedestrian / cycle crossing, not bridge as highlighted in the figure. 				Comment noted. Change the key to figure 5 as follows. Delete " New pedestrian/cycle bridge – proposed " and replace with " New pedestrian/cycle river crossing - proposed "

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635854	Barts Health NHS Trust		LP228	PART 2: VISION AND OBJECTIVES , Figure 5 :The key diagram	No				Key Diagram As in our previous representations, if the intention is to show the interrelationship between principal spatial designations, this should not be done on a geographic base – it must be wholly diagrammatic. Any expression of the geographic extent of designations should be restricted to the Policies / Proposals Map. Confusion may arise, for example, where an indicative location for 'MedCity' is illustrated yet individual buildings within a town centre are shaded. We support the indicative illustration of 'MedCity'. We continue to object to the illustration of the 'Green Spine' in Whitechapel for the reasons set out in our representations to the Regulation 18 draft of the emerging local plan, in particular the absence of a draft local plan policy that identifies the land that would be needed to effect the delivery of such an open space or a clear mechanism setting out how such an open space could be delivered. As we noted previously, to achieve its purpose the 'Green Spine' must be deliverable in its totality. The intention was to connect Whitechapel Road and Commercial Road. The Regulation 19 draft local plan now no longer shows the Green Spine notation connecting to Whitechapel Road and so it appears that a Green Spine is not achievable. If that is the case then the Council ought to be less prescriptive about the form of open space that it would like to see brought forward in the Whitechapel South area. We have also made comments on this matter in relation to the proposed site allocation (see below).	Yes		<p>The extent of the spatial designations on the diagrams/figures is indicative and shown for illustrative purposes only. Detailed boundaries are shown on the Policies Map.</p> <p>Support is welcomed on the Med City designation. However, the Green Spine forms a central element of the Whitechapel masterplan proposals. It will be delivered through a range of mechanisms, including the use of financial contributions.</p> <p>Comment is noted. The supporting text (paragraph 8.18) will be amended to confirm that the Green Sprint will provide a pedestrian link between Whitechapel Road and Commercial Road, from the town centre to a new civic square at the site of St Andrews Church.</p>
1142559	Tim Brennan	Historic England	LP437	PART 2: VISION AND OBJECTIVES , 1.1 Paragraph	N/A			Key objective 1: managing the growth and shaping change The proliferation of tall buildings across Tower Hamlets has been one the major challenges in managing new development in recent years, and in particular addressing their impact on the local historic environment. We consider that this should be reflected in objective 1 of the Plan (as indeed it was in the previous consultation draft). We therefore recommend that a further bullet point be added to the section headed 'Implemented through': 15. Ensuring that new development involving tall buildings is plan-led and successfully reflects local character and context			Comment noted. However in this case the key objective relates to development as a whole in the borough (not just tall buildings). No change.	

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829908	Andrew Wood		LP65	PART 3: POLICIES, 1.3 Paragraph	No	Consistent with national policy			To quote the The Chief Planning Officer, Steve Quartermain CBE, 12th July 2017 letter to LPA's 'This letter is to remind local planning authorities of the important role the planning system plays in ensuring appropriate measures are in place in relation to counter-terrorist and crime prevention security. Both the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out guidance in creating safe and accessible communities. In particular, I would draw your attention to the following: paragraphs 58 and 69 of the NPPF recommend that local planning authorities ensure their policies and decisions aim to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Paragraph 164 advises that when preparing their Local Plan, local authorities should work with local advisors and others to ensure that they have taken into account the most up-to-date information about higher risk sites in their area for malicious threats and natural hazards, including steps that can be taken to reduce vulnerability and increase resilience. The Design section of the PPG includes crime prevention and security measures.' There are no references in the LP to crime, terrorism, ASB etc. It is therefore inconsistent with the NPPF.	Yes		Policy D.DH2 does require development to incorporate the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users. This is considered to be covered adequately already in D.DH2 (parts 1 and 2) and the supporting text in paragraph 3.18. Whilst the threat of crime and terrorism is not specifically referenced, paragraph 3.18 requires a need to ensure the safety of streets and crowded places through the correct level of protection whilst not compromising the creation of aesthetic and functional public spaces.
829908	Andrew Wood		LP69	PART 3: POLICIES, 1.4 Paragraph	No	Consistent with national policy			Forgot to add letter from Chief Planning officer about no mention of security issues in the LP See attached letter. I believe this to be a material omission.	Yes		Policy D.DH2 does require development to incorporate the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users. This is considered to be covered adequately already in D.DH2 (parts 1 and 2) and the supporting text in paragraph 3.18. Whilst the threat of crime and terrorism is not specifically referenced, paragraph 3.18 requires a need to ensure the safety of streets and crowded places through the correct level of protection whilst not compromising the creation of aesthetic and functional public spaces.

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1142365		Newport Holdings Ltd	LP216	PART 3: POLICIES, Chapter 2: Achieving sustainable growth	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Chapter 2: Achieving Sustainable Growth We support the overall approach set out under draft Policy S.SG1, directing new development towards the opportunity areas, including the City Fringe, noting that in relation to the latter this will be a focus for financial and business services as well as an identified location for the delivery of significant amounts of housing. This accords with the London Plan, which identifies these opportunity areas as having significant potential to accommodate new development (especially on brownfield land) and support urban renewal, with a particular focus on highly accessible locations.	Yes		Support for the approach in policy S.SG1 is welcomed.
1142559	Tim Brennan	Historic England	LP440	PART 3: POLICIES, 2.1 Paragraph	N/A			We support the approach to directing growth towards the opportunity areas and accessible locations on existing transport corridors, and are encouraged by the supporting text making clear that new development should have regard to the borough's 24 places. To further strengthen this objective, we suggest the following amendment: Para 2.10 '... and other relevant guidance and evidence, such as conservation area appraisals, design guides, supplementary planning guidance and the borough			Amend paragraph 2.10 (Part 3): The Local Plan also seeks to protect and enhance the character and distinctiveness of the borough's 24 places that make up each of the four sub-areas (see figure 4). Development within the sub-areas will be expected to have regard to the distinct characteristics of the borough's 24 places, as defined within the Tower Hamlets Urban Structure and Characterisation Study and other relevant guidance, such as conservation area appraisals, design guides, the Conservation Strategy and supplementary planning documents.	

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1142493		Berkeley Group	LP382	PART 3: POLICIES, 2.1 Paragraph	No			council's Conservation Strategy'	D.SG3: Health Impact Assessments Part 1 should be revised to ensure that HIA is required for EIA developments rather than Major Developments. The requirement would be too onerous for all developments over 10 dwellings Soundness Test: Revise to make deliverable and therefore effective	Yes		<p>London Plan (GLA, 2016) policy 3.2 (part C) states: 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.' Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy), we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes:</p> <p>Policy D.SG3: Health impact assessments</p> <p>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</p> <p>a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:</p> <p>i. Education facilities. ii. Health facilities. iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application.</p> <p>And to the supporting text (paragraph 2.22):</p> <p>Health impact assessments should be undertaken using the recommended guidance from our public health service. (f For example, the latest Healthy Urban Planning Checklist, which also provides a</p>

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												rapid health impact assessment tool (Healthy Urban Development Unit).
1142186	Andrew Wood	Isle of Dogs NP Forum	LP140	PART 3: POLICIES, 2.3 Paragraph	No	Positively prepared			If you overlay the PTAL map (2021 version to include Crossrail 1) Appendix 1 with the Site Allocations, Tall Building Zones, and the maps and tables showing where growth is expected, there is a disconnect. Development is not encouraged in areas with high PTALS, and encouraged where PTAL is not that high. The area with the worst transport connections (Poplar Housing River Zone) has two site allocations: Ailsa Street and Leven Road Gas Works. Whereas areas with very high PTAL levels (6a or 6b), around Mile End, Bow Road, Stepney Green Underground stations are not identified for development. There is an inherent conflict between transport capacity and sites where development is being encouraged.			The majority of site allocations have a high PTAL rating. Those site allocations with low PTAL ratings recognise the need to unlock transport improvements as delivery considerations. PTAL ratings were factored into the density assumptions in the London SHLAA and the housing trajectory. Development assumptions must address a range of factors, not just PTAL (for example, conservation factors or other land use requirements).
1049487		Ashbourne Beech Property	LP100	PART 3: POLICIES, 2.3 Paragraph	No	Justified			1. Policy S.SG1. The policy identifies that new development in the borough will be directed towards the opportunity areas and/or highly accessible locations along transport corridors. This principle is supported as this accords with the policy and guidance in the London Plan. Part 3 of the policy continues to state that "The majority of housing and employment will be focused in the Isle of Dogs and South Poplar Opportunity Area, principally within Canary Wharf and north of the Isle of Dogs." Paragraphs 2.4 – 2.16 provide the explanation for the policy. Nowhere, however, is it stated why most new housing and employment provision is to be focused principally within Canary Wharf and north of the Isle of Dogs. Paragraph 2.11 acknowledges that sites have been identified across a range of locations to address the housing and employment needs of the borough. Several these site allocations are located to the south of Canary Wharf. As such it is considered that part 3 of the policy should be amended by the removal of the words "...principally within Canary Wharf and north of the Isle of Dogs."	Yes		The current London Plan (policy 2.10) refers to 'the related area in the north of the Isle of Dogs'. This area covers an area around Canary Wharf (including areas to the south and north of Canary Wharf). The Local Plan seeks to use the same terminology but will make a minor change to ensure this is clear: Policy S.SG1: Areas of growth and opportunity within Tower Hamlets The majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area, principally within Canary Wharf and the area in the north of the Isle of Dogs . Significant amounts of new housing will also be delivered in the City Fringe and Lower Lea Valley (including the Poplar Riverside Housing Zone) opportunity areas.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP301	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	N/A			This policy outlines that the majority of new development within the Borough will be directed towards the opportunity areas and highly accessible locations. This includes the City Fringe Opportunity Area which will also continue to act as a key focus for financial and business services. Section 3 of the policy notes that significant amounts of new housing will also be delivered in the City Fringe Opportunity Area. This is in accordance with the London Plan and is fully supported by our client. Section 7 of the policy notes that development will be required to support the delivery of significant		Yes		A policy change is not considered necessary as it is already flexible. Paragraph 2.15 (supporting text to part 7) refers to policy D.SG5 and section 4, both of which outline how developers are expected to contribute towards delivering infrastructure (including through CIL).

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								new infrastructure to support growth within the four sub-areas including improvements to the transport network; green grid projects; and social infrastructure. Although this is acknowledged and supported, the policy should include the option for off-site delivery or contributions where it is not practical or viable to provide this on site.				
1143156	Hondo Enterprises	Hondo Enterprises	LP762	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	N/A			This policy seeks to direct new development within the Borough towards the opportunity areas and highly accessible locations. It states that the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar Opportunity Area. This principle is supported and is in accordance with the London Plan. Sub-section 2 of this policy also requires development within a site allocation to deliver the identified land uses, infrastructure requirements and design and delivery principles. The current wording of the policy could be interpreted to mean that development within a site allocation is required to deliver all identified land uses, infrastructure requirements and design principles set out within the site allocation. The delivery of these should be subject to feasibility and development viability and the policy wording should be amended to reflect this.				It is not considered that this change is necessary, as all development schemes are subject to viability in line with the NPPF. This is reflected in policy D.SG5: Developer contributions. The Local Plan Viability assessment has looked at viability of the policies and indicates that their delivery is broadly viable.

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624580	Jason Larkin	Canary Wharf Group Plc	LP502	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No	Positively prepared; Effective			Draft policy S.SG1: 'Areas of growth and opportunity within Tower Hamlets' correctly directs new development towards opportunity areas and highly accessible locations. We support part 3 of the policy which states that the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area, principally within Canary Wharf and north of the Isle of Dogs. Similarly, we welcome part 5 of the policy (and supporting para. 2.13) which states that the continued growth of Canary Wharf will be promoted to support its strategic role as a metropolitan centre. However, this is on the proviso that development outside the Canary Wharf Estate is properly coordinated and that the appropriate level of infrastructure is provided to support the development. Part 2 of draft policy S.SG1 states that "development within or part of a site allocation is required to deliver the identified land uses, infrastructure requirements and design and delivery principles". We will comment specifically on site allocations later in these representations, however generally it is important that enough positive flexibility exists in policy to allow for changes to identified land uses, where evidenced, given the length of the plan period. As such, in order to be positively prepared and effective the following text should be added to the explanatory text in para. 2.11: "The Council will continually monitor the housing and employment needs of the borough and where evidenced, review the site allocation requirements to make sure that there is an adequate supply of new homes and jobs to meet future needs." This would also be consistent with the approach set out in Part 5, Chapter 6: 'Monitoring and review' (para. 6.3) of the Draft Local Plan. With reference to part 7 of draft policy S.SG1, the supporting text to the policy (para. 2.15) should acknowledge the social infrastructure such as schools, open space, health facilities and leisure facilities as well as road and transport facilities are all on the Council's CIL Regulation 123 List (September 2016). Generally therefore, development will support this infrastructure though the existing CIL levy.			It is not considered that either change is required to enhance clarity. The commitment to monitoring and reviewing the plan is already laid out in section 5 (chapter 6). Paragraph 2.15 refers to policy D.SG5 and section 4, both of which outline how developers are expected to contribute towards delivering infrastructure (including through CIL).

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1142656	Rabina Khan		LP520	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No	Positively prepared; Justified; Effective			<p>The local plan appears to favour particular areas within Tower Hamlets. There is a suggestion to provide larger investments to the edges of Tower Hamlets i.e. East/CW and West/Bishopsgate, with minimum investment to central TH. This is assumed by "Policy S.SG1" and Figure 5 (on page 24). A reasonable assumption would be to assume that "developments" will primarily focus around "highly accessible" transport corridors. This will leave other sections of TH not seeing development or investments. pink and red) as the central sub areas. The plan does not mention Grenfell Tower, nor the issue of flammable cladding. At the Overview and Committee Meeting on 17 September, I asked why the plan had not considered Grenfell. Councillor Blake responded: "In terms of cladding, both you and I hope will both be very concerned to be responsible in terms of the kind of expectations that we would have for the local plan. "The Grenfell enquiry will open today and we will wait to see what recommendations come out (of the Grenfell enquiry) in terms of advice about cladding. I think it would be unusual to be making statements at such an early stage about requirements in cladding at this level of document, although obviously we want to make sure that what we're saying in our local plan makes sure that building in towns is done in the most safe way possible, but at this point all responsible figures in public will be waiting to see what the findings are from the enquiry that started today, which as I hope you know, does include considering building regulations and fire regulations within those as well, so as soon as we have a clear guidance - because you may or may not know, it's very difficult for Council and Building Regulations Office at the moment, to get clear guidance. We think that's the current condition for compensation with CLG. "We're continuing to ask for what the guidance should be on building regulations and CLG is saying to us, we need to take professional advice and then professional advisers will then phone you back, so we're absolutely determined to make sure that building that comes forward in Tower Hamlets is safe and appropriately built, but like everyone else, we have to wait responsibly for the findings of that enquiry." Whilst I welcome these comments the borough has a duty to include a section called "Challenges" within the Local Plan and ensure that it considers the views of residents in Tower Hamlets who have raised various concerns at different platforms in relation to the Grenfell Tower tragedy.</p>			<p>The growth areas in the plan are a result of the extensive work undertaken with the GLA through the London Strategic Housing Land Availability Assessment. This considers where land is available to develop and the probability of it coming forward for development. The land availability in the borough reflects the history of the borough's development and changing role from industrial to residential uses. As such most available land is not in the centre of the borough, although the plan still anticipates the central area delivering 7,624 homes over the course of the plan period, 14% of the total.</p> <p>Fire and safety considerations are specifically addressed in parts 3 and 6 of the emerging Local Plan.</p> <p>In relation to tall buildings, consideration of public safety requirements will need to be demonstrated as part of the overall design, including the provision of evacuation routes (see policy D.DH6: tall buildings). Building regulations, rather than planning policy, provide the detailed regulations on ensuring fire safety and it is envisaged that these will be updated following the findings of the enquiry.</p> <p>In relation to houses of multiple occupation, applicants will be expected to comply with the appropriate fire safety standards (see policy D.H7: housing with shared facilities).</p> <p>In relation to waste collection facilities and bin stores, suitable safety control measures will be required to mitigate the fire risk (e.g. sprinklers, fire extinguishers and smoke detection equipment).</p> <p>The Mayor of London is consulting on a series of fire safety standards as part of the consultation to the new London Plan in response to the Grenfell Tower fire. However, the London Plan is still at an early stage in its development and the recommendations of the public inquiry into the Grenfell Tower fire are still awaited.</p>

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1142656	Rabina Khan		LP534	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No	Positi vely prepa red; Justifi ed; Effect ive			With the identification of the areas, the local plan sets out objectives for developments and its goal for a sustainable community, clearly highlighting aspirations which it seeks to achieves. The proposal of a community with "equal stake and status" and "reducing inequalities, promoting community cohesions" would seem unachievable, due to focus on certain areas and to some degree neglecting the central sub areas.			The growth areas in the plan are a result of the extensive work undertaken with the GLA through the London Strategic Housing Land Availability Assessment. This considers where land is available to develop and the probability of it coming forward for development. The land availability in the borough reflects the history of the borough's development and changing role from industrial to residential uses. As such most available land is not in the centre of the borough, although the plan still anticipates the central area delivering 7,624 homes over the course of the plan period, 14% of the total.
1143308	Raycliff Whitechapel	Memery Crystal	LP794	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	Yes		The Whitechapel Bell Foundry site is on the boarder of the Aldgate and Whitechapel area of LBTH, in the south west corner of the Borough. It contains a series of brick built, former engineering and industrial workshops originating from the C18th, to more modern construction dating from the 1950s. The former use of the site as a Bell Foundry ceased its industrial (B2 use class) operations in Spring 2017, following falling demand for church bells, rising business costs and the difficulties of maintaining the Grade II* listed fabric, which is now in a poor state of repair. The then owners, the Hughes family, chose to sell the business and premises and redistribute parts			Yes		Support for the approach in policy S.SG1 is welcomed.

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							<p>of it to be continued elsewhere, with artefacts and archive materials being donated or contracted to the Museum of London and the London Metropolitan Archives. The site has employed approximately 22 people in its prime, although in recent years, this was reduced to around 11 people. Our client is acutely aware of the history and significance of the site and is keen to bring it back into a functioning use that is reflective of its unique and special character. Initial high-level discussions with LBTH and Historical England officers have commenced, however the details of the proposed scheme are at still at an early stage. Our client welcomes the latest consultation version of the Local Plan 2031, in particular its clarification on building heights and policy zones, including the Central Activity Zone (CAZ) and the town centre hierarchy, as well as the management of growth and</p>					

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							<p>opportunity. The Grade II* listed site is currently located within the Whitechapel Road Conservation Area. Other notable designations are its inclusion in the CAZ and the City Fringe Opportunity Area (CFOA). The CAZ and CFOA designations are proposed to be carried forward in the emerging Plan, which is strongly supported. It is noted that the CAZ has been divided into Zones (the site is in Zone C). The site is also going to be designated as a District Town Centre (and potentially re-designated as a 'Major Town Centre'), and located with the newly designated Whitechapel Local Employment Location (LEL). The frontage to Whitechapel Road is to be Secondary Shopping Frontage area.</p>					

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790873	Sport England	Sport England	LP835	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No	Positively prepared; Justified; Consistent with national policy			Policy S.SG2: Delivering Sustainable Growth in Tower Hamlets Sport England welcomes the mention of healthy environments and encouraging physical activity and wellbeing as an overriding policy. Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy to many of the objectives of the policies within the Local Plan, especially in relation to tackling poor health and inactivity. Sport England recommend that Policy S.SG2 mentions Active Design, its principles and checklist to really develop the links between these principles and the Local Plan. Alternatively, Active Design could sit well within Policy S.DH1: Delivering High quality design and/or along with the Health Impact Assessment requirement in Policy D.SG3 a completed Active Design checklist could be submitted. More information on Active Design, including the guidance, can be found via the following link; http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/			Active design and the Sport England guidance have been referenced significantly in the policies within chapter 8: Enhancing open spaces and water spaces. As the plan has to be read as a whole, it is considered unnecessary to repeat this guidance in other policies. However, we will reference active design within the supporting text to policy S.SG2 (paragraph 2.19) as follows: Improving health and wellbeing in the borough is a key priority in our Community Plan, reflecting the borough's significantly high levels of poor health outcomes. This policy seeks to address high levels of poor health in the borough, which environmental improvements, including incorporating active travel, active design and healthy streets principles , can help to reduce <i>[insert footnote below]</i> . Further details on the borough's health profile and priorities and the links between health and the built environment can be found in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016) and the Tower Hamlets Health and Wellbeing Strategy (2017).
1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP882	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	N/A			Policy S.SG1 seeks to direct new development within the borough to opportunity areas (City Fringe, Lower Lea Valley and Isle of Dogs and South Poplar); and highly accessible locations along transport corridors. Figure 5 (The Key Diagram) sets out the vision and objectives, providing a spatial representation of the overall approach to managing growth and shaping change across the borough. We note that 82 West India Dock Road has previously been identified by the GLA as being located within the Isle of Dogs and South Poplar Opportunity Area. Figure 5 does not show the site's inclusion within the Opportunity Area, this should be updated.			The GLA's Isle of Dogs and South Poplar Opportunity Area and the Local Plan's sub-area 4 boundary are identical and 82 Westferry Road is within both boundaries. Please note: the Policies Map (online) provides a clearer map which can be zoomed in on to provide more detailed analysis.	

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP915	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	N/A			<p>Policy S.SGJ: Areas of growth and opportunity within Tower Hamlets This policy seeks to direct new development within the Borough towards the Opportunity Areas and highly accessible locations. It states that the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar Opportunity Area. This principle is supported and is in accordance with the London Plan.</p> <p>Sub-section 2 of this policy also requires development within a site allocation to deliver the identified land uses, infrastructure requirements and design and delivery principles. At present the wording of the policy could be interpreted to mean that development within a site allocation is required to deliver all identified land uses, infrastructure requirements and design principles stated within the site allocation. The delivery of such should be subject to feasibility and development viability and the policy wording should be amended as follows:</p> <p>"2. Development is required to demonstrate how it will address the priorities and principles within these opportunity areas as well as the Central sub-area. Development within or part of a site allocation is required to INSERT <contribute to the delivery of> DELETE< deliver> the identified land uses, infrastructure requirements and design and delivery principles, INSERT <with regard to site specific development viability and feasibility>."</p>				It is not considered that this change is necessary, as all development schemes are subject to viability in line with the NPPF. This is reflected in policy D.SG5: developer contributions. The Local Plan Viability Assessment has looked at viability of the policies and indicates that their delivery is broadly viable.

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1142691		Alliance Property Asia	LP591	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No				POLICY S.SG1: AREAS OF GROWTH AND OPPORTUNITY WITHIN TOWER HAMLETS This policy outlines that the majority of new development within the Borough will be directed towards the opportunity areas and highly accessible locations. This includes the City Fringe Opportunity Area which will also continue to act as a key focus for financial and business services. Section 3 of the policy notes that significant amounts of new housing will also be delivered in the City Fringe Opportunity Area. This is in accordance with the London Plan and is fully supported by our client. Section 7 of the policy notes that development will be required to support the delivery of significant new infrastructure to support growth within the four sub-areas including improvements to the transport network; green grid projects; and social infrastructure. Although this is acknowledged and supported, the policy should include the option for off-site delivery or contributions where it is not practical or viable to provide this on site. Note: No Soundness test undertaken.	Yes		It is not considered that this change is necessary, as all development schemes are subject to viability in line with the NPPF. This is reflected in policy D.SG5: developer contributions. The Local Plan Viability Assessment has looked at viability of the policies and indicates that their delivery is broadly viable.
1142493		Berkeley Group	LP381	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No				S.SG1: Areas of growth and opportunity within Tower Hamlets The broad thrust of the Policy is supported. Flexibility should be added to the wording of part (2). As we note in our main representations the Council has overallocated for some uses (eg. schools, and should retain the flexibility to release certain obligations Soundness Test: Revise to make deliverable and therefore effective	Yes		The Site Allocations Methodology (2017) and the Spatial assessment Need for Schools (2018) outlines the council's approach to the provision of schools. Matters regarding the delivery of infrastructure at the time of the applications being assessed will be discussed further at the examination in public.
1142548	Grafton Group PLC	Grafton Group PLC	LP426	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	Yes		The policy is supported. We agree that it is appropriate for new development to be directed to the Lower Lea Valley, Isle of Dogs and South Poplar area. We support the requirement for the majority of new housing and employment provision within the borough to be focused with the Isle of Dogs and South Poplar opportunity area. We support the aspiration for					Support for the approach in policy S.SG1 is welcomed.

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							Canary Wharf to be better integrated with the public realm and development opportunities with adjoining areas around Poplar and the Isle of Dogs.					
1033284	Unknown	One Housing Group	LP389	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	Yes		Areas of growth and opportunity within Tower Hamlets Policy S.SG1 states that the majority of new housing within the Borough will be focussed within the Isle of Dogs and South Poplar opportunity area and that development will be required to support the delivery of transport infrastructure and social infrastructure, such as schools, open space, health centres and leisure facilities. One Housing supports this policy, in particular the need to provide adequate infrastructure to support development.			Yes		Support for the approach in policy S.SG1 is welcomed.

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1142556	Regal London	Regal London	LP427	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	Yes		The policy is supported. We agree that it is appropriate for new development to be directed to the Lower Lea Valley, Isle of Dogs and South Poplar area. We support the requirement for the majority of new housing and employment provision within the borough to be focused with the Isle of Dogs and South Poplar opportunity area. We support the aspiration for Canary Wharf to be better integrated with the public realm and development opportunities with adjoining areas around Poplar and the Isle of Dogs.					Support for the approach in policy S.SG1 is welcomed.
1143324		Resolution Property plc	LP820	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No	Effective			Policy S.SG2 (Delivering sustainable growth in Tower Hamlets) sets out the Borough wide strategy for delivering sustainable growth. However, the current wording of the policy is too broad in the context of a borough wide policy and therefore we suggest the following amendment to paragraph a (ii): ii. insert <having regard for> the character and setting of the area <and in the case of development involving listed buildings and in conservation areas preserving or enhancing the character and setting of the area>; and	Yes		It is not considered that this change is necessary. The context of the development, including presence of heritage assets or conservation areas, will determine whether the development would have unacceptable impacts. This does not have to be specified.

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671908		UKI (Fleet Street) Limited and UKI (Shoredit ch) Limited	LP893	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	No				Policy S.SG1: Areas of growth and opportunity within Tower Hamlets This policy seeks to direct new development within the Borough towards the opportunity areas and highly accessible locations. This includes the City Fringe OA which will also continue to act as a key focus for financial and business services. Biotech, life sciences and digital industries will be primarily concentrated in the City Fringe opportunity area (OA) to support the development of Tech City and Med City clusters. It is noted that significant amounts of new housing will also be delivered in the City Fringe opportunity area. The principle of focussing development within key areas such as the opportunity areas is in accordance with the London Plan (March 2016) and is fully supported. However, the Local Plan should still include clear encouragement of development opportunities and the importance that other sites outside of the opportunity areas can play in meeting targets for residential and employment. It is recognised that the borough's town centres will continue to be the focus of shopping, leisure, culture and community activities and will include a broad range of uses that are accessible to a significant number of people via foot, cycle or public transport. It is acknowledged that development will be required to support the delivery of significant new infrastructure to support growth within the four sub-areas including improvements to the transport network; green grid projects; and social infrastructure. Reference should be added to include the option for off-site delivery or contributions where it is not practical or viable to provide this on site.			It is not considered that either change is required to enhance clarity. The commitment to monitoring and reviewing the plan is already laid out in section 5 (chapter 6). Paragraph 2.15 refers to policy D.SG5 and section 4, both of which outline how developers are expected to contribute towards delivering infrastructure (including through CIL).

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635773	Al Mubarakia Ltd		LP201	PART 3: POLICIES, 2.4 Paragraph Policy S.SG1: Areas of growth and opportunity within Tower Hamlets	Yes		Policy S.SG1 (Areas of growth and opportunity within Tower Hamlets) This policy states that 'new development should be directed towards the opportunity areas (City Fringe, Lower Lea Valley and Isle of Dogs and South Poplar) and/or highly accessible locations along transport corridors'. Al Mubarakia support this policy, and would like to highlight the location of their site as an appropriate and suitable location to support the strategic aspirations of the Borough with regards to housing and commercial floorspace. The Site is located within the City Fringe Opportunity Sub Area, and is therefore within a location where new development should be directed as per the emerging policy. The City Fringe Opportunity Area boundary runs directly to the east and south of Tobacco Dock, meaning a number of parcels of land within the wider site do not fall within the Opportunity Area.			Yes		We do not feel it is appropriate to extend the Tower Hamlets Activity Area boundary at this stage. It is considered that there is already scope within the plan for employment uses to come forward on the Tobacco Dock site, and any potential future extension to the boundary would be reviewed at a future date once the employment floorspace has come forward.

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							<p>As such, Al Mubarakia consider that LBTH should apply a flexible approach to this policy, which will enable the sustainable and comprehensive development of sites throughout the borough. The wider site is bound by The Highway to its north, which is considered a key transport corridor. The Highway connects Tower Bridge in the west to Canary Wharf in the east, and there are also several pedestrian routes from The Highway south towards the Ornamental Canal and the River Thames. Accordingly, The Highway plays an important role in providing both north-south and east-west connections throughout the borough. Al Mubarakia would like to emphasise the role of The Highway as a key transport corridor within the Borough, and ensure new development is encouraged throughout its surrounding area. The Tobacco Dock site is also located within the Tower Hamlets Activity</p>					

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							<p>Area (THAA), which is identified within adopted Policy SP01 as a transitional area between the Central Activities Zone and the rest of the borough, providing a 'vibrant mix of uses that are economically competitive'. It is considered that Activity Areas should also be included within the Policy S.SG1 as locations where new development should be directed to. As an extension of this, it is also suggested that in combination with the dock buildings, where the landowner has an interest and therefore control over a wide range of sites, with their neighbours the THAA should be extended to ensure that the opportunities focused around the dock can be maximized, complementing those mix of land uses permitted on the London Dock site. At Appendix 1, we include our proposed extension to the designated area and we would welcome further discussion with LBTH on this point.</p>					

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1142656	Rabina Khan		LP521	PART 3: POLICIES, 2.9 Paragraph	No	Positively prepared; Justified; Effective			This would be a slight contradiction, because in the plan there is intention to develop around the opportunity areas and areas with highly accessible transport corridors. Sections such as Shadwell, Stepney, Devons Rd, Bow (Roman Rd) would not qualify as “highly accessible transport corridors” due to the distance to/from train links or main roads. Figure 10 provides a more detailed view of the concentrations for housing delivery, clearly giving most significance to the Canary Wharf area and very low for Bow, Bromley by Bow, Cubit Town, Limehouse, Millwall, Shadwell and Stepney.			<p>The growth areas in the plan are a result of the extensive work undertaken with the GLA through the London Strategic Housing Land Availability Assessment. This considers where land is available to develop and the probability of it coming forward for development. The land availability in the borough reflects the history of the borough's development and changing role from industrial to residential uses. As such most available land is not in the centre of the borough, although the plan still anticipates the central area delivering 7,624 homes over the course of the plan period, 14% of the total.</p> <p>The boundaries of growth areas in figure 10 are ward boundaries, as that the smallest spatial scale we can disaggregate future growth down to. The boundaries cannot be changed.</p> <p>Figure 10 is simply a visual and spatial representation of the existing housing trajectory. In order to clarify the role of the figure, we propose inserting the following additional information in footnote 18:</p> <p>Please note: figure 10 is a spatial representation of the Local Plan housing supply outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available the distribution of growth is based around ward boundaries and is therefore indicative.</p>

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1141834	Peter Marsden		LP629	PART 3: POLICIES, 2.1 Paragraph	N/A			Guidance on drawing up heritage impact assessments for planning applications within or affecting World Heritage Sites was published by ICOMOS (International Council on Monuments and Sites) in conjunction with UNESCO's World Heritage Centre in 2011. We recommend that this guidance be referenced in Explanation para. 2.10 (page 27) as follows: The Local Plan also seeks to protect and enhance the character and distinctiveness of the borough's 24 places that make up each of the four sub-areas (see figure 4). Development within the sub-areas will be expected to have regard to the distinct characteristics of the borough's 24 places, as defined within the Tower Hamlets Urban Structure and Characterisation Study and other relevant guidance, such as conservation area appraisals, design guides and supplementary planning documents. INSERT <Where there is potential impact on a London World Heritage Site within or Tower Hamlets or in adjoining boroughs, we expect ICOMOS (International Council on Monuments and Sites) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, January 2011, to be consulted.>				It is not considered this change is necessary as this guidance is heavily referenced in policy D.DH4: Shaping and managing views and policy D.DH5: World heritage sites and these policies would be applied to any relevant applications. This guidance will be referenced as an evidence link in policy D.DH4 as a minor modification.
1142985	Transport for London (TfL)	Transport For London	LP726	PART 3: POLICIES, 2.13 Paragraph	N/A			<ul style="list-style-type: none"> TfL welcomes the aspiration for Canary Wharf to be considered a Metropolitan Town Centre for the borough. Importantly as part of this role (and in agreement with Policy S.TC1), improvements to local connectivity will be vital to support the town centre in this capacity and sustainable travel needs to be enabled and encouraged, particularly walking and cycling. 				We welcome support to upgrade Canary Wharf to a "Metropolitan Centre". Note that the new draft London Plan (GLA, 2017) includes this upgrade.

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1142186	Andrew Wood	Isle of Dogs NP Forum	LP123	PART 3: POLICIES, 2.16 Paragraph	No	Consistent with national policy			The NPPF requires us to “adapt to climate change including moving to a low carbon economy.” But words like solar power (or Photovoltaic) or heat pump do not appear in the Local Plan. As a result, the Local Plan does not anticipate energy generation from non-fossil fuel sources. This is especially relevant in the lack of consideration given in the Local Plan to the emerging use of battery technology as part of the energy infrastructure in Tower Hamlets, and it’s use on the IoD as storage for alternative sources of energy generation, such as solar or water. There are schemes scoping out its viability currently underway in Hackney, Waltham Forest, Nottingham, Sheffield, Islington and several other locations. The Local Plan has a duty under this provision to “mitigate and adapt to climate change including moving to a low carbon economy” which can only be created through the creation of non-reactive power grid using power storage methods. We ask that the LBTH consider a viability study on the use of energy storage technology on the IoD as part of a wider project looking at distributed energy generating networks.	Yes		This change is not considered necessary. Policy D.ES7: A zero carbon borough sets out far reaching requirements in relation to delivering low carbon developments. This policy requirement moves beyond the direction provided for in the Written Ministerial Statement, but is supported by the GLA's Housing SPG and the draft London Plan (2017). The policy doesn't stipulate types of low carbon technology which should be used but requires individual developments to consider which is most appropriate for their circumstances to deliver the carbon reductions required. The borough will continue to develop relevant studies regarding heat networks. This takes place outside the Local Plan process.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP302	PART 3: POLICIES, 2.17 Paragraph Policy S.SG2: Delivering sustainable growth in Tower Hamlets	Yes		This policy notes that development will be supported where it delivers managed growth, and shares the benefits of growth through various means. The objectives of this policy are supported by our client.			Yes		Support for policy S.SG2 welcomed
624580	Jason Larkin	Canary Wharf Group Plc	LP503	PART 3: POLICIES, 2.17 Paragraph Policy S.SG2: Delivering sustainable growth in Tower Hamlets	No	Justified			With reference to draft policy S.SG2: ‘Delivering sustainable growth in Tower Hamlets’, we would repeat our comment from the Regulation 18 consultation where we stated that it is unclear how it is possible to measure or deliver the promotion of “good mental and physical wellbeing”. Despite our request, there is still no justification or further explanation in the supporting text to the policy			The link between the built environment and mental and physical wellbeing has been widely evidenced. Its delivery will be shaped through the delivery of relevant policies in the Local Plan regarding air quality, design standards, open space provision etc. This evidence has been collated in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016) and also informs the Tower Hamlets Health and Wellbeing Strategy 2017 and the draft GLA Health Inequality strategy 2017. We will add references to these documents as a footnote to paragraph 2.19, as follows: Improving health and wellbeing in the borough is a key priority in our Community Plan, reflecting the borough’s significantly high levels of poor health outcomes. This policy seeks to address high levels of poor

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												<p>health in the borough, which environmental improvements, including incorporating active travel, active design and healthy streets principles, can help to reduce (insert footnote below).</p> <p>Further details on the borough's health profile and priorities and the links between health and the built environment can be found in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016) and the Tower Hamlets Health and Wellbeing Strategy (2017).</p>
1142691		Alliance Property Asia	LP593	PART 3: POLICIES, 2.17 Paragraph Policy S.SG2: Delivering sustainable growth in Tower Hamlets	Yes		POLICY S.SG2: DELIVERING SUSTAINABLE GROWTH IN TOWER HAMLETS This policy notes that development will be supported where it delivers managed growth, and shares the benefits of growth through various means. The objectives of this policy are supported by our client. Note: No soundness test undertaken.			Yes		Welcome support for policy S.SG2
1033284	Unknown	One Housing Group	LP390	PART 3: POLICIES, 2.17 Paragraph Policy S.SG2: Delivering sustainable growth in Tower Hamlets	Yes		Delivering sustainable growth in Tower Hamlets One Housing supports Policy S.SG2, which encourages development that shares the benefits of growth through measures, including: contributing to creating healthy environments; creating mixed and balanced communities; creating tenure-blind developments; increasing			Yes		Welcome support for policy S.SG2

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							opportunities for social interaction; providing local training or employment opportunities; and, delivering social and transport infrastructure and public realm improvements which are inclusive and accessible to all.					
1049487		Ashbourne Beech Property	LP99	PART 3: POLICIES, 2.20 Paragraph	No	Justified			Policy D.SG3. The policy relates to health impact assessments. The policy requires a HIA for all major developments and many other types of development. Can it be clarified how the provision of a HIA relates to applications accompanied by Environmental Statements? How does the approach in the policy assist in streamlining the planning process? The justification for provision of a HIA is by reference to the advice in the Healthy Urban Planning Checklist. Is this an approach supported by the GLA?	Yes		Supporting text (paragraph 2.24) states that A health impact assessment can also be submitted as part of an integrated impact assessment. So for schemes which also have to be accompanied by an EIA, the health impact assessment can form an enhanced element of the 'human health' section of an EIA. The GLA's response did not raise any queries or objections to this proposed policy so we consider it to be supported.
1052996		Kentucky Fried Chicken (Great Britain) Limited	LP122	PART 3: POLICIES, 2.20 Paragraph	No	Justified			There is no evidence to suggest that food sold from uses within Class A5 has any more impact to health than food sold from Class A1, A3 or A4 uses, so that the requirement for a Health Impact Assessment specifically for uses within this Class is onerous.	Yes		The health of impacts of A5 uses has been well evidenced. There are also numerous public health programmes, such as the Healthier Catering Commitment Standard, which seek to address the health impacts of A5 uses. This evidence is included in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016). It is therefore considered proportionate that A5 uses complete a HIA through which they can demonstrate how they will reduce the negative impacts the proposal could have and increase the positive impacts.

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1052996		Kentucky Fried Chicken (Great Britain) Limited	LP127	PART 3: POLICIES, 2.20 Paragraph	No	Effective			Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods. However, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. For that reason, requiring a Health Impact Assessment from a potential operator, based on what could only be nutritional information specific to that operator, is unlikely to result in a useful assessment of the health consequences of granting permission at a particular site. Conversely, were one to require information about the impact of Class A5 uses generally, firstly, the point of a site-by-site impact assessment is lost and, secondly, the incentive for good practice is removed. Consequently, the requirement in respect of Class A5 uses should be removed.	Yes		The health of impacts of A5 uses has been well evidenced. There are also numerous public health programmes, such as the Healthier Catering Commitment Standard, which seek to address the health impacts of A5 uses. This evidence is included in the Tower Hamlets Joint Strategic Needs Assessment: Planning and Health (2016). It is therefore considered proportionate that A5 uses complete a HIA through which they can demonstrate how they will reduce the negative impacts the proposal could have and increase the positive impacts. This will enable different A5 uses to demonstrate their different impacts. The HIA process will be informed by the council's public health service who have the experience and expertise to assess nutritional information
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP303	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessments	No	Consistent with national policy			Our client supports sustainable growth in Tower Hamlets but does not support Policy D.SG3 which states that all major developments are required to complete a Health Impact Assessment (HIA) as part of their planning application. The text should be amended to better reflect the policy and guidance set out in the London Plan (Policy 3.2) which requires that a Plan or development should consider the impact on health and wellbeing of communities, "for example, through Health Impact Assessments". The London Plan continues to state that HIA's should be considered for those developments that are anticipated to have significant implications for people's health and wellbeing. It is evident that the London Plan does not require a HIA to accompany all major developments but rather those schemes that are anticipated to have significant implications for people's health and wellbeing. We request that the policy be amended to align with the London Plan.	Yes		London Plan (GLA 2016) policy 3.2 (part C) states 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.' Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy), we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes: Policy D.SG3: Health impact assessments 1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application. a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses: i. Education facilities. ii. Health facilities. iii. Leisure or community facilities.

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												<p>iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application. And to the supporting text:</p> <p>Paragraph 2.22: Health impact assessments should be undertaken using the recommended guidance from our public health service. For For example, the latest Healthy Urban Planning Checklist, which also provides a rapid health impact assessment tool (Healthy Urban Development Unit).</p>
624580	Jason Larkin	Canary Wharf Group Plc	LP504	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessments	No	Justified; Consistent with national policy			With regard to draft policy D.SG3: Health impact assessments, we would also repeat our comments from the Regulation 18 consultation with respect to Health Impact Assessments ("HIAs"). It is onerous to require every major development to provide an HIA and does the Council's public health service have sufficient resources to process the number of HIAs that would be received? It would be much more efficient to scope out at pre-application stage those developments which would require an HIA (as with any other potential supporting planning application document) and the policy wording should be made clearer to reflect this. This would be consistent with para. 193 of the NPPF which states that local planning authorities should only request supporting information that is relevant, necessary and material to the application in question			<p>London Plan (GLA, 2016) policy 3.2 (part C) states 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.' Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy) we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes:</p> <p>Policy D.SG3: Health impact assessments</p> <p>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</p> <p>a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:</p> <p>i. Education facilities. ii. Health facilities.</p>

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												<p>iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application. And to the supporting text:</p> <p>2.22 Health impact assessments should be undertaken using the recommended guidance from our public health service. f For example, the latest Healthy Urban Planning Checklist, which also provides a rapid health impact assessment tool (Healthy Urban Development Unit).</p>
1054252	Londone wcastle	Londone wcastle	LP606	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessment s	No	Justifi ed			Our client supports sustainable growth in Tower Hamlets but does not support Policy D.SG3 which states that all major developments are required to complete a Health Impact Assessment (HIA) as part of their planning application. The text should be amended to better reflect the policy and guidance set out in the London Plan (Policy 3.2) which requires that a Plan or development should consider the impact on health and wellbeing of communities, “for example, through Health Impact Assessments”. The London Plan continues to state that HIA’s should be considered for those developments that are anticipated to have significant implications for people’s health and well-being. It is evident that the London Plan does not require a HIA to accompany all major developments but rather those schemes that are anticipated to have significant implications for people’s health and well-being. We request that the policy be amended to align with the London Plan. As a result, we do not believe the draft plan to be justified.			<p>London Plan (GLA, 2016) policy 3.2 (part C) states: ‘The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.’ Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy), we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes:</p> <p>Policy D.SG3: Health impact assessments</p> <p>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</p> <p>a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:</p> <p>i. Education facilities. ii. Health facilities.</p>

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												<p>iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application. And to the supporting text:</p> <p>2.22 Health impact assessments should be undertaken using the recommended guidance from our public health service. f For example, the latest Healthy Urban Planning Checklist, which also provides a rapid health impact assessment tool (Healthy Urban Development Unit).</p>
1053977	Power Leisure Bookmakers Ltd	Power Leisure Bookmakers Ltd	LP469	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessments	No	Positively prepared; Justified; Effective; Consistent with national policy			COPIED FIRST SECTION TO POLICY TC5 ALSO . We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the Tower Hamlets Local Plan 2031 (Regulation 19). Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national policy documents and guidance as in the NPPF. Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014-20140306) “appropriate and proportionate evidence is essential for producing a sound Local Plan” and “evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”. Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy. The Council will also be aware that as a regulator they must comply with the Regulators’ Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The Code seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce regulatory burdens on businesses. We originally made comments, on our client’s behalf, on 20 December 2016 in relation to the Pre-Publication Consultation on the Local Plan. We are disappointed to see that our comments have not been taken on board, nor has any additional evidence been introduced to justify the policies proposed in relation			It is not considered that this comment requires any changes to be made to the policy. The Tower Hamlets Joint Strategic Needs Assessment (2016) outlines the link between gambling (including betting shops) and health. It is therefore considered proportionate for proposals for betting shops to have to consider their health impacts through the undertaking of an HIA. Finally, it is noted that this representation makes a number of references to Haringey’s Local Plan - it is unclear to what extent these comments are based on a reading or understanding of the Tower Hamlets Local Plan.

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									<p>to betting shops. Our client's comments concern the provisions of policies TC5 (4) 'Food, Drink, Entertainment and the Night-time Economy' and SG3 'Health Impact Assessments'. In summary, our client considers that betting shops, as an appropriate town centre use, should not be excluded from certain parts of the borough. It is also considered that Policy TC5 (4) and SG3 overlap the considerations of licensing with those of planning. There are therefore elements of the Plan which require amendments and /or explanation before the Plan can be considered 'sound'. Specific comments can be found below. Policy SG 3 – Health Impact Assessments We find the requirement for betting shop applications to be accompanied by a health impact assessment to be completely unreasonable and goes beyond the planning system. This would undermine the role of the Licensing Authority whose duty it is to assess such matters. When applying for a gaming licence, betting shop operators must provide information and evidence demonstrating that they have appropriate training and management procedures/policies in place to show that they will comply with these objectives, including the protection of children and other vulnerable people, something that betting shop operators take very seriously. It would be unnecessary and inappropriate for this process to be duplicated via planning policy. Given that the proposed policy justification (Para 2.21) states that betting shops are a use that is most likely to impact health outcomes, it would be expected that the council's evidence base would explain the research and evidence collated to demonstrate such a concern. Upon review of the council's evidence base, no evidence has been provided to show a link between betting shops and health, or indeed health inequality. A similar claim was included in the LB Haringey Development Management DPD which recently went through an Examination in Public. Although some attempt was made to legitimise such a claim, the Inspector did not accept that there was sufficient evidence to link betting shops with poor health and removed the claim from the text (Modification 97). DMM97, PARAGRAPH 6.55 Amend paragraph 6.55 to read: The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the <delete link between health outcome and the proximity of betting shops. It concludes there is sufficient evidence to demonstrate that access to gambling venues, including betting shops, leads to increased gambling behaviours and that this, in turn, is associated with poor health outcomes> <insert spatial distribution of licenced betting shops in Haringey. The baseline information has since been updated using the Council's licensing</p>			

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									<p>data 2016), which shows a notable concentration of betting shops in town centres, particularly in Wood Green and Tottenham, when compared to elsewhere in the borough.> It is on the basis of a lack of evidence being presented to distinguish a link between betting and health concerns, that we request that 'v) betting shops' is removed from Policy SG 3. Again, we consider that the Plan is currently unsound on the basis that it is not justified by a credible evidence base, it would not be effective as it creates a confusing overlap with licensing objectives, and it is not consistent with national policy (as it is not compliant with the NPPF as outlined above). Summary We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any concentrations which would lead to negative impacts, however, to assert unnecessary vetoes on areas where betting shop operators can locate (when there is no robust evidence to support the approach) is wholly unsubstantiated and does not allow officers/members to make objective decisions. It also places unnecessary burdens on betting shops operators who already need to submit an application when looking for new units. In summary, our comments are as follows: • Policy TC5 (4) – It is unclear why the Council are seeking to exclude betting shops from primary frontages, neighbourhood centres, neighbourhood parades or other non-designated centres within the borough. Betting shops are appropriate town centre uses and no evidence has been produced that suggests betting shops are inappropriate in these areas. • Policy TC5 (4) – There is a clear overlap between the provisions of this policy and the licensing considerations for betting shops legislated by the Licensing Act. • Policy SG 3 – There is no evidence to suggest that there is a link between health and betting shops. We suggest that LB Tower Hamlets consider the points raised within this letter and take our client's comments into consideration in the preparation of the plan and request that you keep us informed on further progress and consultations.</p>			

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1053881	Sally Styles	C M A Planning Ltd	LP87	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessments	No	Justified			D.SG3 – Health Impact Assessments Comment: As per previous comments made in respect of the Regulations 18 consultation in respect of Policy SG1 Part 7a (as was), the previous objections are maintained. As previously stated the requirement for a Health Impact Assessment is an onerous and unreasonable requirement for all major developments and should be required for larger scale developments only. The policy as drafted goes beyond London Plan policy 3.2, Part C. Suggested Amendment: Replace a) Major Developments with a) Strategic Developments	Yes		<p>London Plan (GLA, 2016) policy 3.2 (part C) states 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.' Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy), we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes:</p> <p>Policy D.SG3: Health impact assessments</p> <p>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</p> <p>a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:</p> <p>i. Education facilities. ii. Health facilities. iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment as part of the planning application. And to the supporting text:</p> <p>2.22 Health impact assessments should be undertaken using the recommended guidance from our public health service. f For example, the latest Healthy Urban Planning Checklist, which also provides a rapid health impact assessment tool (Healthy Urban Development Unit).</p>

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP956	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessment s	No				Policy D.SG3 (Health impact assessments) outlines the type of developments that will require the submission of a Health Impact Assessment. The submission of the assessment is a validation requirement and therefore should not be included within the Local Plan as policy. We therefore recommend that this draft policy is removed.			This is not considered to be a more effective method of delivering this policy requirement. The policy enables us to provide more guidance in relation to the types of development it applies to how it should be carried out.
1142691		Alliance Property Asia	LP594	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessment s	No				POLICY D.SG3: HEALTH IMPACT ASSESSMENTS. Our client supports sustainable growth in Tower Hamlets but does not support Policy D.SG3 which states that all major developments are required to complete a Health Impact Assessment (HIA) as part of their planning application. The text should be amended to better reflect the policy and guidance set out in the London Plan (Policy 3.2) which requires that a Plan or development should consider the impact on health and wellbeing of communities, "for example, through Health Impact Assessments". The London Plan continues to state that HIA's should be considered for those developments that are anticipated to have significant implications for people's health and wellbeing. It is evident that the London Plan does not require a HIA to accompany all major developments but rather those schemes that are anticipated to have significant implications for people's health and wellbeing. We request that the policy be amended to align with the London Plan. Note: No soundness test undertaken.	Yes	<p>London Plan (GLA, 2016) policy 3.2 (part C) states: 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments.' Policy D.SG3 follows this approach by requiring major developments to provide a rapid HIA. Due to local circumstances (evidenced in the Tower Hamlets Health and Wellbeing Strategy), we also require rapid HIAs on developments in certain areas or of certain uses. We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified to make it clearer what is required and propose the following changes:</p> <p>Policy D.SG3: Health impact assessments</p> <p>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</p> <p>a. Major developments. b. New development within an area of sub-standard air quality (as shown on the Policies Map). c. Developments which contain any of the following uses:</p> <p>i. Education facilities. ii. Health facilities. iii. Leisure or community facilities. iv. A5 uses (hot-food-takeaways). v. Betting shops. vi. Publicly accessible open space.</p> <p>2. Developments of a scale referable to the Greater London Authority (as set out in legislation) are required to complete and submit a detailed health impact assessment</p>	

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												as part of the planning application. And add to the supporting text (paragraph 2.22): Health impact assessments should be undertaken using the recommended guidance from our public health service. (f For example, the latest Healthy Urban Planning Checklist, which also provides a rapid health impact assessment tool (Healthy Urban Development Unit).
1142035		Hermes Property Unit Trust	LP148	PART 3: POLICIES, 2.21 Paragraph Policy D.SG3: Health impact assessments	Yes			Policy D.SG3: Health Impact Assessments It would be helpful to define 'major developments' in Part 1 of the policy. We note Part 2 states that schemes that are of a size to be referable to the Mayor should provide a Health Impact Assessment.		Yes		It is not considered that this is necessary as a definition is provided in the glossary.
1033229	Paul Burley	Montagu Evans LLP	LP40	PART 3: POLICIES, 2.25 Paragraph	No	Justified			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Planning and Construction of New Development As noted in our previous representations, it is not necessary for developers to sign up to the "Considerate Constructors Scheme" or any other proprietary scheme to ensure that they behave in a responsible and neighbourly manner. Many developers have their own code of conduct which could be satisfactorily secured by planning condition. The requirement to sign up to a third party scheme adds unnecessarily to the costs of development. Furthermore, enforcement of the CCS is not a matter for the Council. The Council should be requiring measures which can be secured / ensured using its powers under the Planning Acts.	Yes		Policy D.SG4 already acknowledges that constructors may have their own schemes and the supporting text states that membership of these may also be considered to fulfil the requirements of the policy. This requirement is not covered under an alternative legislative regime, so it is considered appropriate for this to be covered by planning, especially in an area where a large amount of development is occurring amongst existing residential communities.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP647	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and construction of new development	Yes		Policy D.SG4: Planning and construction of new development We particularly support the cumulative analysis section as we have so many large construction sites close to each other and the re-use of materials in order to avoid more road traffic.			Yes		Support for policy D.SG4 is welcomed
1141890	Amanda Day		LP19	PART 3: POLICIES, 2.26	No	Positively prepared			How can a densely inhabited area absorb more development which will then have a minimal impact			Comment is noted and the policies in the plan seek to mitigate this impact.

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				Paragraph Policy D.SG4: Planning and constructio n of new developme nt		red						
624580	Jason Larkin	Canary Wharf Group Plc	LP505	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and constructio n of new developme nt	No	Justifi ed			We would still question the justification for parts 1 and 2 of draft policy D.SG4: 'Planning and construction of new development'. The requirements listed in part 1 all seem to be factors that would be comprised within a planning condition and usually cumulative impact assessments (part 2) are only provided for Environmental Impact Assessment ("EIA") development.			We consider that this policy provides a clear steer to developers of their requirements with regards to the construction phase of development. This provides better clarity and is more transparent for consultees and decision makers. Given the scale of development occurring in the borough in the vicinity of existing communities, it is considered that the need to assess cumulative impact goes beyond EIA developments. The inclusion of this policy was specifically recommended within the Integrated Impact Assessment.
1105881	Michael Atkins	Port of London Authority	LP311	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and constructio n of new developme nt	N/A			6. Policy D.SG4: Planning and Construction of new development (page 34) It is noted in policy D.SG4 that a list of criteria is provided for all major developments to adhere to in regards to the planning and construction of new development. The PLA consider that there should be reference either in point c (consider the routing, timing and frequency of heavy goods vehicle movements to reduce their impact on vulnerable road users, local amenity and congestion.) or d (use, where available, construction and/or freight consolidation centres.) to the need to encourage more use of the blue ribbon network for the transportation of freight, in accordance with policy 5.18 (Construction, Excavation and Demolition Waste) of the London Plan. This is also in accordance with the PLAs Thames Vision goal to get more goods off roads and onto the river.				It is not considered that this change is necessary. Policy D.TR4: sustainable delivery and servicing addresses in detail the need to prioritise movement by water and this policy is listed in the policy links section.
1142985	Transpor t for London (TfL)	Transpor t For London	LP727	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and	Yes		▪ TfL welcomes the inclusion of this policy to mitigate construction of new development.					Support for policy D.SG4 is welcomed

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				constructio n of new developme nt								
1142493		Berkeley Group	LP383	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and constructio n of new developme nt	No				D.SG4: Planning and construction of new development Wording could be tightened in relation to part (2) cumulative impact, to confirm that it relates to the construction phase and that more onerous requirements eg. assessment of all developments within a kilometre should only relate to EIA developments. Again they would be too onerous for all developments of over 10 dwellings Soundness test: Revise to make deliverable and therefore effective	Yes		Given the scale of development occurring in the borough in the vicinity of existing communities, it is considered that the need to assess cumulative impact goes beyond EIA developments. The inclusion of this policy was specifically recommended within the Integrated Impact Assessment. It is agreed that the supporting text could be worded more clearly to clarify that this policy applies to the development phase and we propose the following minor modification to clarify: Paragraph 2.31: Cumulative impacts arising from the construction phase of other major developments building works with one kilometre radius...
635854	Barts Health NHS Trust		LP230	PART 3: POLICIES, 2.26 Paragraph Policy D.SG4: Planning and constructio n of new developme nt	No				Planning and Construction of New Development As noted in our previous representations, it is not necessary for developers to sign up to the “Considerate Constructors Scheme” or any other proprietary scheme to ensure that they behave in a responsible and neighbourly manner. Many developers have their own code of conduct which could be satisfactorily secured by planning condition. The requirement to sign up to a third party scheme adds unnecessarily to the costs of development. Furthermore, enforcement of the CCS is not a matter for the Council. The Council should be requiring measures which can be secured / ensured using its powers under the Planning Acts.	Yes		Policy D.SG4 already acknowledges that constructors may have their own schemes and the supporting text states that membership of these may also be considered to fulfil the requirements of the policy. This requirement is not covered under an alternative legislative regime, so it is considered appropriate for this to be covered by planning, especially in an area where a large amount of development is occurring amounts existing residential communities.
1142844	Ahmed Hussain	Alpha Grove Freehold ers Associati on	LP648	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributio ns	No				Policy D.SG5: Developer contributions Given the value of land in this area there is no reason to support vacant credit as a method to ensure more brownfield land is developed. AGFA is particularly interested in the future regeneration of IoD by One Housing Group (OHG) Although not planning material but it is worth mentioning that the council constantly talks about how high value the land is on the IoD but when it comes to regeneration this value is not carried forward by the council or any other interested body to those who are effected; and if not equally mentioned then it should not be referenced either Note: No soundness test undertaken.	Yes		Support for policy D.SG5 (part 2) is welcomed

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1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP304	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Consistent with national policy			This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into Section 106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required Section 106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected Section 106 planning obligations cannot be delivered due to development viability is welcomed. The exemption for the application of vacant building credit within Tower Hamlets is contrary to National Planning guidance and could therefore be considered unsound. This section of the policy should be amended to align with National Planning guidance.	Yes		The GLA Affordable Housing and Viability SPG (2017) states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1143353	Greenland Hertsmer e (London) Ltd		LP873	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	N/A			Policy D.SG5 (developer contributions) sets out the proposed policy requirements for developer contributions. We support the policy but seek an amendment to the text that clarifies that S106 agreements for affordable housing contributions are only required when affordable housing contributions are required. We suggest the following amendment is made to paragraph b: b. enter into section 106 agreements to provide affordable housing, INSERT <where required>, and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant supplementary planning documents or guidance; and			This change is not considered necessary as the policy already states: enter into section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary or appropriate...'. It is therefore already clear that some sites won't have to provide affordable housing (i.e. non-residential developments).	
1143156	Hondo Enterprises	Hondo Enterprises	LP763	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No				This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into S106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required S106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected S106 planning obligations cannot be delivered due to development viability is welcomed. The exemption for the application of vacant building credit within Tower Hamlets is contrary to National Policy and could therefore be considered unsound.			The GLA's Affordable Housing and Viability SPG (2017) states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance

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												provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1033272	James Stevens	Home Builders Federation Ltd	LP789	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Consistent with national policy			We note that the Council intends to dis-apply the national policy position of the vacant building credit (VBC) that was introduced through the Written Ministerial Statement of 28 November 2014: Support for small scale developers, custom and self-builders. The Council sets out its case for this in its Local Plan Viability Assessment. We note the argument in paragraph 6.28 that the majority of the land supply in Tower Hamlets will be on brownfield land and consequently the VBC has a disproportionate effect on affordable housing supply. The Mayor and other London boroughs have advanced the same argument in recent months. We, however, are unconvinced by the 'unique circumstances' of London argument. The same issues confront every highly constrained town and city in England where most housing supply depends on the recycling of land, and especially where projected housing needs outpace the availability of land to accommodate those housing needs in full (e.g. the very large unmet housing needs in Birmingham, Brighton & Hove, Crawley, Luton and Ipswich). However, if this argument is accepted, it would undermine the efficacy of the government having introduced the VBC in the first place – the justification of which has been upheld by the High Court. The Council should be reminded that the purpose of the VBC and the higher threshold for contributions to affordable housing is to support small developers, custom and self-builders. The government has judged this to be of greater importance than the effect it might have on the supply of affordable housing units. We note the Mayor's signal through his Homes for Londoners SPG that he considers that the VBC is inappropriate in most cases in London. This however is only an SPG; it is not yet adopted London Plan policy. The SPG has been challenged on a number of grounds by the HBF and others, where we warned the Mayor that he should not try to dis-apply national policy via an SPG – he should do so through the new London Plan. The Council should adhere to the national policy position.			The GLA's Affordable Housing and Viability SPG (2017) states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
624580	Jason Larkin	Canary Wharf Group Plc	LP506	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Justified			Part 1 (c) of the draft policy requires developers to submit a financial viability assessment as part of a planning application where they do not meet planning policy requirements or do not propose to deliver required s106 planning obligations. Supporting para. 2.43 states that "part 1 (c) aims to ensure developers maximise contributions towards the delivery of affordable housing and infrastructure..." The "maximisation" of contributions is not however			Part c of the policy applies when developments indicate that they are unable to meet the section 106 planning requirements outlined in policy i.e. they are unable to meet those requirements which would meet the tests outlined in paragraph 204 of the NPPF (which are outlined in paragraph 2.40 of the supporting text). In this context it is in keeping with the

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									consistent with the criteria for seeking planning obligations set out in Regulation 122 of the Community Infrastructure Levy (CIL) Regulations and para. 204 of the NPPF. Part 2 of the draft policy states that vacant building credit will not apply in the borough. This is inconsistent with the GLA's Affordable Housing and Viability SPG (2017) which does allow vacant building credit to be applied in certain circumstances. The draft policy should therefore be updated to reflect the GLA's position. In order to be consistent with National Policy and therefore sound, the text of the draft policy should be amended to make clear that planning obligations will only be sought where they meet the tests set out in Regulation 122 and para. 204 of the NPPF. The position on vacant building credit should also be updated to reflect the GLA's position.			regulations for the council to seek to maximise contributions, whilst still ensuring the development can be delivered. The GLA's Affordable Housing and Viability SPG (2017) states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
719346	John Turner	Ballymore Group	LP276	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No				Policy D.SG5 – Developer Contributions We are concerned that Part 2 of policy D.SG5 is retained in the new Local Plan. The policy specifically states that the Council will not apply Vacant Building Credits (VBC) to new schemes. This approach is in direct comparison to government guidance on VBC which states: NPPG Paragraph 21 What is the Vacant Building Credit? 'National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace'. NPPG Paragraph 22 What is the process for determining the vacant building credit? 'Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an	Yes		The GLA's Affordable Housing and Viability SPG (2017) states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough. We welcome support for part c of the policy.

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									equivalent financial contribution is being provided....' It is therefore strongly considered that the Council should amend part 2 of policy D.SG5 to reflect government guidance on the issue. This will enable continuity with the interpretation of the policy at a strategic and national level. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected Section 106 planning obligations cannot be delivered due to development viability is welcomed.			
1054252	Londone wcastle	Londone wcastle	LP616	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributio ns	No	Consi stent with natio nal policy			This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into Section 106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required Section 106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected Section 106 planning obligations cannot be delivered due to development viability is welcomed. The proposed exemption for the application of vacant building credit within Tower Hamlets is contrary to National Planning guidance and could therefore be considered unsound. This section of the policy should be amended to align with National Planning Practice Guidance. As a result, we do not believe that the draft plan is consistent with national policy.			The GLA's Affordable Housing and Viability SPG states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. Evidence for this has been established in the Strategic Housing Market Assessment (2017) and Tower Hamlets Viability Assessment (2018). In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1142716	Lyca Group		LP683	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributio ns	N/A			Policy D.SG5 (developer contributions) sets out the proposed policy requirements for developer contributions. We support the policy but seek an amendment to the text that clarifies that S106 agreements for affordable housing contributions are only required when affordable housing contributions are required. We suggest the following amendment is made to paragraph b: b. enter into section 106 agreements to provide affordable housing, INSERT< where required>, and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant supplementary planning documents or guidance; and			This change is not considered necessary as the policy already states: enter into section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development <i>where necessary or appropriate...</i> '. It is therefore already clear that some sites won't have to provide affordable housing (i.e. non-residential developments).	

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1053881	Sally Styles	C M A Planning Ltd	LP93	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Justified			D.SG5 (part2) Developer Contributions Comment: Rather than a definitive statement that the use of Vacant Building Credit will not be accepted, the approach to the Vacant Building Credit should reflect that of the GLA SPG which identifies criteria for circumstances where it could be appropriate. Suggested Amendments: Bring the policy in line with the GLA SPG Affordable Housing and Viability, in particular paragraphs 2.68 – 2.78.	Yes		The GLA's Affordable Housing and Viability SPG states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. Evidence for this has been established in the Strategic Housing Market Assessment (2017) and Tower Hamlets Viability Assessment (2018). In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP955	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No				Policy D.SG5 (Developer contributions) Policy D.SG5 (developer contributions) sets out the proposed policy requirements for developer contributions. We support the policy but seek an amendment to the text that clarifies that S106 agreements for affordable housing contributions are only required when affordable housing contributions are required. We suggest the following amendment is made to paragraph b: b. enter into section 106 agreements to provide affordable housing, INSERT <where required>, and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant supplementary planning documents or guidance; and			This change is not considered necessary as the policy already states: enter into section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary or appropriate...'. It is therefore already clear that some sites won't have to provide affordable housing (i.e. non-residential developments).
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP916	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	N/A			This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into S 106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required S 106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected S 106 planning obligations cannot be delivered due to development viability is welcomed.				Support for part c is welcomed

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1142691		Alliance Property Asia	LP597	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	Yes		<p>POLICY D.SG5: DEVELOPER CONTRIBUTIONS</p> <p>This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into Section 106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required Section 106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected Section 106 planning obligations cannot be delivered due to development viability is welcomed. Note: No soundness test undertaken.</p>			Yes		Support for part c is welcomed.

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1049487		Ashbourne Beech Property	LP101	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Justified			Policy D.SG5. The policy outlines the approach to developer contributions. The policy should be amended to acknowledge that S106 contributions will be subject to viability and ensuring that "...the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable." (NPPF, para 173) Part 2 of the policy relates to the Vacant Building Credit and sets out that the Credit will not apply in the borough. The Council's viability evidence (para 2.45) concludes there is no need to apply the credit to kick start development. The Government introduced the VBC by way of Ministerial Statement, to encourage development of vacant buildings by allowing for the floorspace of vacant buildings being brought back into use to be used as a credit against any uplift in residential accommodation to reduce the likely viability impact of requirements for affordable housing. The justification for not introducing the VBC set out at para 2.45 is that the effect of the Credit will be to reduce affordable housing contributions. Is there evidence for this? Will not the Credit see buildings otherwise left vacant brought back into use to deliver much needed new housing and encourage other development?	Yes		Part 1c of the policy explicitly makes it clear that section 106 agreements are subject to viability by indicating a need to submit viability reports when policy requirements are not met. There is no need to repeat NPPF policy in the Local Plan. The GLA's Affordable Housing and Viability SPG states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick start development. Evidence for this has been established in the Strategic Housing Market Assessment (2017) and Tower Hamlets Viability Assessment (2018). In addition, the affordable housing need in Tower Hamlets and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1142493		Berkeley Group	LP384	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No				D.SG5: Developer contributions Revise Policy DSG.5 to make clear that Planning Obligations will meet the CIL Reg 122 tests, and that Viability Assessment will be consistent with the Mayor of London's Affordable Housing and viability SPD Soundness test: Not justified as viability assessments do not include all policy requirements, not effective because combined weight of obligations puts plan delivery at risk, and not consistent with paragraph 173 of the NPPF	Yes		The CIL regulation 122 tests are outlined in the supporting text (paragraph 2.40). Supporting text for part c directs developments to follow the latest Development Viability Supplementary Planning Guidance. Tower Hamlets has developed a new Development Viability Supplementary Planning Document which reflects the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance.

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1142493		Berkeley Group	LP320	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No	Justified; Effective; Consistent with national policy			<p>Justified: No, the evidence base does not test all policy requirements and obligations (details are set out in St. William's site specific representations for the Gasworks sites) and on several sites demonstrates that they are not achievable Effective: No, the combined burden of obligations and proposed approach to viability does not demonstrate clearly what is required Consistent with National Policy: No, para 173 of the NPPF, and specifically Policy D.ES7 where the Government has suggested authorities should not seek to set enhanced carbon standards thorough the planning system Policy D.SG5 sets out the Council's proposed approach to developer contributions. It states that development will be required to pay CIL charges, enter into S106 agreements to provide affordable housing, and mitigate the impacts of development and submit a viability assessment where they: 'do not meet policy requirements or do not propose to deliver required S106 planning obligations'. The supporting text states that (at paragraph 2.43): "Part 1 (c) aims to ensure developers maximise contributions towards the delivery of affordable housing and infrastructure in line with the vision and objectives of the plan, whilst still ensuring development can be delivered."</p> <p>However, not only does the Draft Plan require housing contributions, along with CIL which sits outside the Plan, but it also places a range of other obligations which, if all were required would make several of the strategic allocations unviable. This both delays development and is contrary to national policy. These policies are not only about mitigating the impacts of development but prescribing what development does and placing significant obligations on development. Policies include: • Policy D.H2: Affordable Housing • Policy D.EMP2/D.EMP set detailed requirements for replacement and new floorspace including requiring 'affordable' employment space; • Policies D.TC3 and D.TC5 place restrictions on certain sizes and types of units outside Town Centres which reduce viability of such uses in Site Allocations where they might be appropriate; • Policy D.CF3 requires new and enhanced community facilities, which are carried through to site allocations; • Policy S.OSW1 and D.OSW3 set requirements for new and enhanced Open Spaces; • Policy D.ES7 imposes substantial costs to meet carbon standards which exceed national Government policy. The zero carbon agenda was dropped by the Government when the housing standards were introduced in 2015 in recognition of the considerable progress already made in energy efficiency, and the costs involved. The Government has also made clear that energy efficiency should be addressed through building regulations rather than planning policy. It is not technically feasible to achieve</p>	Yes		<p>The whole of the Local Plan has been viability tested, as have all the site allocations. The policies are considered deliverable with an understanding that in some circumstances this may be challenging and viability assessments can therefore be submitted which evidence this.</p> <p>The CIL regulation 122 tests are outlined in the supporting text (paragraph 2.40).</p> <p>Supporting text for part c directs developments to follow the latest Development Viability Supplementary Planning Guidance. Tower Hamlets has developed a new Development Viability Supplementary Planning Guidance which reflects the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance.</p>

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									zero carbon so it is essentially a tax and must be considered in the context of other obligations on development including CIL and affordable housing; • Various site specific requirements including in relation to heritage assets. Some, but not all of these policies have been accounted for in the Council's site-specific viability assessments, but they will all impact on the ability of developers to deliver. The Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (2017) sets out what is described as a 'threshold' approach to viability. This includes (page 17) a 'Fast Track' route where: Applications will not be required to provide viability information, nor be subject to review mechanisms provided an agreed level of progress is made following the grant of planning permission, where they: § deliver at least 35 per cent affordable housing on-site without public subsidy; § are consistent with the relevant tenure split (see section on tenure below) and meet other obligations and requirements to the satisfaction of the LPA and the Mayor where relevant; and § have sought to increase the level of affordable housing beyond 35 per cent by accessing grant. The inclusion of significant additional planning obligations and challenging policies in the Plan (for example on housing mix) are likely to mean that most strategic sites, containing a high proportion of housing supply, are unable to use this route and be subject to the delay and uncertainty of the 'Viability Tested Route' even if they provide the 35% affordable housing target. In this context it is important that the Council identifies its priorities and is clear what is required in different circumstances as it will not be possible to meet all requirements on every site. It will also be necessary to ensure that policies in relation to design and density (including tall buildings) are flexible enough to allow the capacity of sites to be appropriately maximised given substantial infrastructure requirements. Modifications to make sound 1. Revise Policy DSG.5 to make clear that Planning Obligations will meet the CIL Reg 122 tests, that Viability Assessment will be consistent with the Mayor of London's Affordable Housing and viability SPD 2. Remove policies D.ES7 and D.EMP2 (4) or make the latter subject to viability 3. Confirm that Policies D.TC3 and D.TC5 may not be appropriate for large Site Allocations 4. Ensure that Open Space and Community Facility costs/implications are properly assessed in site allocations			
1142035		Hermes Property Unit Trust	LP149	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer	Yes			Policy D.SG5: Developer contributions We support the approach of the policy, including submission of financial viability assessment developments are unable to meet all the planning policy requirements contained within the Plan.		Yes		Support for part c is welcomed

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				contributions								
1142035		Hermes Property Unit Trust	LP153	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	Yes			Policy D.SG5: Developer contributions We support the approach of the policy, including submission of financial viability assessment where developments are unable to meet all the planning policy requirements contained within the Plan.		Yes		Support for part c is welcomed
1142035		Hermes Property Unit Trust	LP151	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	Yes			Policy S.DH1: Delivering high quality design and Policy D.DH2: Attractive streets, spaces and public realm We support the general thrust of achieving high quality design for the Borough. We do however consider that overly prescriptive design policies do not always work in harmony with the commercial realities of site delivery or market demand. The policy should also allow for consideration of site constraints and opportunities instead of seeking to rigidly mirror the character and context of adjacent sites. This in our view would lead to a diverse and interesting character throughout the Borough. This is particularly prevalent when considering the appropriate height, scale and massing for sites. Due to financial viability constraints, some sites may need to deliver a higher quantum of development and mixtures of uses in order to seek to meet the wide range of policy requirements (including CIL contributions) required by the Plan.		Yes		This has been responded to in response to comments submitted in relation to policy S.DH1
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP888	PART 3: POLICIES, 2.33 Paragraph Policy D.SG5: Developer contributions	No				Policy D.SG5: Developer Contributions This policy outlines the expectations for developments to pay Community Infrastructure Levy charges; enter into S106 agreements to provide affordable housing and necessary provisions to mitigate impacts of the development; and submit financial viability assessments where planning applications do not meet planning policy requirements or do not propose to deliver required S106 planning obligations. The acknowledgement that financial viability assessments should be submitted where policy requirements or expected S106 planning obligations cannot be delivered due to development viability is welcomed. The exemption for the application of vacant building credit within Tower Hamlets is contrary to National Planning guidance and could therefore be considered unsound.			The GLA's Affordable Housing and Viability SPG states that in London, in most circumstances, affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate. It directs decision makers to consider the need for affordable housing and the rate of past delivery. Tower Hamlets has considered its appropriateness in the borough and has concluded that it is not needed to kick-start development. Evidence for this has been established in the Strategic Housing Market Assessment (2017) and Tower Hamlets Viability Assessment (2018). In addition, the affordable housing need in Tower Hamlets

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												and London remains extremely high. Tower Hamlets has therefore taken into account the guidance provided in the GLA's Affordable Housing and Viability SPG and concluded that the limited circumstances will not need to be applied in this borough.
1142985	Transport for London (TfL)	Transport For London	LP723	PART 3: POLICIES, 2.39 Paragraph	N/A			<ul style="list-style-type: none"> Whilst it is welcoming that MCIL is highlighted within this section, for clarity we recommend removing paragraph 2.39 as this doesn't add anything to the narrative of the Local Plan and may cause unnecessary confusion. 				We consider it helpful for the supporting text to reference the MCIL to provide context for the policy inclusion (which we note you support) and so propose retaining this text.
1143353	Greenland Hertsmer e (London) Ltd		LP859	PART 3: POLICIES, Chapter 3: Creating attractive and distinctive places	N/A			We set out our suggestions below in relation to the draft Local Plan Part 3: Policies, focusing on policies relating to residential uses, Secondary Preferred Office Locations (POL), and the Tower Hamlets Activity Areas: Isle of Dogs Activity Area.				Comments will be responded to in relation to representations on individual policies
1142493		Berkeley Group	LP327	PART 3: POLICIES, Chapter 3: Creating attractive and distinctive places	No	Positively prepared; Justified; Effective; Consistent with national policy			Positively prepared: No, doesn't reflect need to optimise delivery of housing on allocated sites Justified: No, LBTH has not published housing capacity or properly tested whether assumed capacity in the housing trajectory can be delivered on allocated sites in context of other obligations and design restrictions Effective: No, not demonstrated that sites are deliverable given other requirements and restrictions Consistent with national policy: No, part 2(c) on heritage assets Appropriate design is clearly a critical issue in a densely populated Borough like Tower Hamlets which also has significant heritage assets. Berkeley Group has worked, for example, at London Dock to respect and enhance local heritage, and provide new and enhanced public realm whilst optimising housing delivery on the site and introducing modern and high density new buildings. Berkeley Group is concerned that the proposed plan policies could put this type of approach at risk by an overly restrictive policy framework which is not consistent with national policy in not differentiating between assets of different value (NPPF, Paragraphs 126 to 141). Policy S.DH3 introduces a requirement that proposals must: "preserve or where appropriate enhance the Borough's historic designated and nondesignated assets." The requirement in relation to 'non-designated assets' potentially places a major restriction and uncertainty over requirements for specific sites. Part 2c of the policy states that proposals to 'alter, extend or change the use of an historic asset or proposals that would affect the setting of a heritage asset' will only be permitted where: "they enhance they enhance or better reveal the significance of assets or their settings". This	Yes		Comments are duplicated and will be responded to in relation to representations on individual policies

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									<p>conflicts with Part 3 of the policy, which in the context of national policy correctly acknowledges: "Any harm to the significance of a heritage asset must be justified having regard to the public benefits of the proposal." Part 2(c) should therefore be removed. Policy D.DH6 Tall Buildings directs tall buildings to 'Tall Buildings Zones'. Paragraph 3.64 defines Tall Buildings as: "any building that is significantly taller than its local context and/or has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building." The latter criteria will apply in large parts of Tower Hamlets including Site Allocations outside of the designated zones. Although D.DH6(3) sets some criteria for buildings outside these zones it could be used as a 'Reason for Refusal' in many cases. The Mayor of London's 2016 Housing SPG makes a number of references to how large sites can accommodate higher densities and set their own 'context' which is relevant to sites in Tower Hamlets outside of the Tall Building Zones. It suggests that: § Large sites can define their own setting and accommodate higher densities (para 1.3.37) §Large parts of London are currently underdeveloped and have no definable character, e.g. very large brownfield sites. This is especially true in the case of large industrial sites and, in such case, new development will "be unlikely to interfere with existing settings and offer particular scope for place shaping to create attractive new communities". (1.3.47) This is not to say that large sites should have no regard to their setting, which will be a particularly important consideration on site boundaries, but that in maximising the potential of such sites buildings 'taller than the local context' can be appropriate. The London Plan states (Policy 7.7C(a)) that Opportunity Areas and Areas for Intensification are appropriate areas for Tall Buildings subject to other criteria. As noted above four of the Berkeley Group sites are in Opportunity Areas and one is in a Housing Zone. London Dock already has planning permission for a building that would be regarded as 'tall' on the basis of para 3.64, and such buildings may also be appropriate on the three Gasworks sites subject to other planning considerations. It is therefore Berkeley Group's view that part (3) of the policy should also refer either to Allocated Sites, or sites in Opportunity Areas or other designated areas as potentially appropriate for tall buildings. Modifications to make sound Remove the word 'non-designated' from Policy S.DH3, and part 2(c) and/or change 'must' in the first line to 'should seek to'. Policy D.DH6(3): Add 'Site Allocations', or 'Site Allocations in Opportunity and Growth Areas' as potential locations for Tall Buildings</p>			

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1142559	Tim Brennan	Historic England	LP441	PART 3: POLICIES, 3.1 Paragraph	N/A			Policies S.DH3 heritage & the historic environment and D.DH6 tall buildings should be added to the policy links section.				Comment is noted. However, a decision was taken not to include links to policies in the same chapter as all policies within the same chapter should be considered as a whole. The policy references only include references to policies in other chapters where these are particularly relevant to the application of a particular policy.
1141890	Amanda Day		LP20	PART 3: POLICIES, 3.2 Paragraph	No	Positi vely prepa red			The current development in Sidney Street to redevelop the old Safe Store site does not take into consideration its location next to the Royal London Hospital Helipad. A tower of the same height is to be built 60 metres from there. Most of Whitechapel is low rise. Most of the plans for this area are not. The intention is to allow high rises on inappropriate sites regardless of "place".			Comments are noted, however as they relate to a specific planning application no response is required in relation to the draft Local Plan policies.
1033229	Paul Burley	Montagu Evans LLP	LP41	PART 3: POLICIES, 3.3 Paragraph	No	Effect ive			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Good Design and Local Character and Historic Environment At Regulation 18 stage we objected to the requirement to re-use buildings wherever possible. We welcome the greater flexibility in the Regulation 19 proposed policy but consider the wording to be unclear: "reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development". This wording should be revised got the purposes of clarity.	Yes		Amend policy S.DH1: Delete part 1d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name 1e-j accordingly in policy and supporting paragraphs
1142035		Hermes Property Unit Trust	LP150	PART 3: POLICIES, 3.3 Paragraph	Yes			We support the general thrust of achieving high quality design for the Borough. We do however object to the Policy as currently worded as it is considered to be overly prescriptive design policies do not always work in harmony with the commercial realities of site delivery or market demand. The policy should also allow for consideration of site constraints and opportunities instead of seeking to rigidly mirror the character and context of adjacent sites. This in our view would lead to a diverse and interesting character throughout the Borough. This is particularly prevalent when considering the appropriate height, scale and massing for sites. Due to financial viability constraints, some sites may need to deliver a higher quantum of development and mixtures of uses in order to seek to meet the wide range of policy requirements (including CIL contributions) required by the Plan.		Yes		The Local Plan policies should be considered as a whole and are a vital tool in delivering high quality design through the planning process. The Local Plan policies have been subject to viability testing and the financial viability of sites will be assessed as part of the planning application process. Further guidance is contained in the Development Viability SPD.

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1142035		Hermes Property Unit Trust	LP152	PART 3: POLICIES, 3.3 Paragraph	Yes			Policy S.DH1: Delivering high quality design and Policy D.DH2: Attractive streets, spaces and public realm We support the general thrust of achieving high quality design for the Borough. We do however consider that overly prescriptive design policies do not always work in harmony with the commercial realities of site delivery or market demand. The policy should also allow for consideration of site constraints and opportunities instead of seeking to rigidly mirror the character and context of adjacent sites. This in our view would lead to a diverse and interesting character throughout the Borough. This is particularly prevalent when considering the appropriate height, scale and massing for sites. Due to financial viability constraints, some sites may need to deliver a higher quantum of development and mixtures of uses in order to seek to meet the wide range of policy requirements (including CIL contributions) required by the Plan.		Yes		Duplicated comment - see response to LP150
1142661	Abdul Basit		LP550	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	N/A			There isn't enough information / support for disable units and design for life properties This is crucial and needs to be addressed in an ever growing population where people are living longer				It is explained in paragraphs 3.9 and 3.10 how developments should be designed to support the needs of all users, including wheelchair users. For clarity, we will amend policy S.DH1 (part 1f): including residential development and social housing , as it applies to all developments. Amend policy S.DH1 part 1f: well-connected, inclusive and integrated spaces
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP649	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	Yes		Policy S.DH1: Delivering high quality design We support this policy. Micro-climates are already a known issue locally and better design will help reduce the impact of those micro-climates. This should reflect on all properties be it private, social or affordable blocks The plan should also encourage in its design			Yes		Comments in support of the policy are welcomed and the criteria will apply to all developments, regardless of tenure. Matters relating to fire safety are currently covered through building regulations. No changes are proposed to the policy.

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							statement any policies learned from the Grenfell Tower Disaster and introduce fire schemes that will save lives i.e. to have external metal staircases on properties taller than four floors; by not addressing this on the design element, the plan becomes unsound					
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP306	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	Yes		Our client supports the importance of good design and the role this plays in creating desirable environments for new and existing communities.			Yes		Support for the policy is welcomed.
624580	Jason Larkin	Canary Wharf Group Plc	LP507	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	No	Justified; Consistent with national policy			Part (c) of draft policy S.DH1: 'Delivering high quality design' states that development must ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) "reflects" their immediate and wider surroundings. Whilst development should take into account its surroundings, it would stifle innovative design if all development should reflect its surroundings. In certain instances, it may be preferable that development did not reflect its surroundings. As such for the policy to be justified, the word "reflects" in the policy should be replaced with "takes account of". Part (e) of draft policy S.DH1 is too general and potentially gives scope for any view to be considered important or building to be considered a landmark, and then ascribed planning policy protection. Important views or landmark buildings should be defined and brought forward through the Local Plan process, consistent with national policy. Part (e) of the draft policy is not justified and should therefore be deleted			Amend policy S.DH1 (part 1c): reflects have regard to their immediate and wider surroundings. It is not accepted that part e should be removed from the policy as this part of the strategic policy underpins policy D.DH4 on shaping and managing views
719346	John Turner	Ballymore Group	LP270	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	Yes		Policy S.DH1 - Delivering High Quality Design We fully support the importance of good design and the role this plays in creating sustainable environments to			Yes		Support for the policy is welcomed.

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							help complement existing communities.					
1142716	Lyca Group		LP692	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	N/A			We recognise the importance of setting out policy requirements for design standards within the Borough. However, the current wording of the policy does not provide scope for buildings of a high design standard that respond differently to the local context whilst still contributing to the aim for high quality design within the Borough. We therefore suggest the following amendments to paragraph 1, c and d : 1. Development is required to meet the highest standards of design, layout and construction DELETE<which respects> and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must: c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) DELETE<reflects> INSERT< has regard to> their immediate and wider surroundings; d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development INSERT<(but not where this would compromise a developments ability to optimise the use of the site);>				Changes suggested to part 1 not considered to alter the emphasis of the policy and therefore unnecessary. Amend policy S.DH1 (part 1c): reflects have regard to their immediate and wider surroundings. Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name policy S.DH1 parts 1e-j accordingly in policy and supporting paragraphs.

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP959	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	No				Policy S.DH1 (Delivering high quality design) We recognise the importance of setting out policy requirements for design standards within the Borough. However, the current wording of the policy does not provide scope for buildings of a high design standard that respond differently to the local context whilst still contributing to the aim for high quality design within the Borough. We therefore suggest the following amendments to paragraph 1, c and d : 1. Development is required to meet the highest standards of design, layout and construction DELETE <which respects> and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must: 2. c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) DELETE <reflects> INSERT <has regard to> their immediate and wider surroundings; d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development INSERT <(but not where this would compromise a developments ability to optimise the use of the site);>			Changes suggested to part 1 not considered to alter the emphasis of the policy and therefore unnecessary. Amend policy S.DH1 Part 1c: reflects have regard to their immediate and wider surroundings. Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name S.DH1 parts 1e-j accordingly in policy and supporting paragraphs.
1143450	Thomson Reuters		LP949	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	N/A			We recognise the importance of setting out policy requirements for design standards within the Borough. However, the current wording of the policy does not provide scope for buildings of a high design standard that respond differently to the local context whilst still contributing to the aim for high quality design within the Borough. We therefore suggest the following amendments to paragraph 1, c and d : 1. Development is required to meet the highest standards of design, layout and construction INSERT< which respects> and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must: c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) DELETE<reflects> INSERT <has regard to> their immediate and wider			Changes suggested to part 1 not considered to alter the emphasis of the policy and therefore unnecessary. Amend policy S.DH1 (part 1c): reflects have regard to their immediate and wider surroundings. Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name policy S.DH1 (parts 1 e-j) accordingly in policy and supporting paragraphs.	

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								surroundings; d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development INSERT <(but not where this would compromise a developments ability to optimise the use of the site);> Given publication of the Mayor's London Plan Review later this month and imminent Opportunity Area Planning Framework for the Isle of Dogs and South Poplar OA, any final Tower Hamlets Local Plan policies and specific site designations should reflect these important strategic planning policy and guidance documents. We thank you again for considering these representations and we would welcome a broader dialogue with officers to ensure that the potential of both Blackwall Yard and the wider area are captured in the emerging plan. We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet. Please do not hesitate to contact us should you require any further information.				
1142691		Alliance Property Asia	LP601	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	Yes		POLICY S.DH1: DELIVERING HIGH QUALITY DESIGN Our client supports the importance of good design and the role this plays in creating desirable environments for new and existing communities. Note: No soundness test undertaken.			Yes		Support for the policy is welcomed.

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1142590		British Airways plc	LP482	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	N/A			Policy S.DH1: Delivering high quality design We recognise the importance of setting out policy requirements for design standards within the Borough. However, the current wording of the policy does not provide scope for buildings of a high design standard that respond differently to the local context whilst still contributing to the aim for high quality design within the Borough. We therefore suggest the following amendments to paragraph 1, c and d : 1. Development is required to meet the highest standards of design, layout and construction DELETE <which respects> and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must: c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) DELETE < reflects > INSERT < has regard to> their immediate and wider surroundings; d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development INSERT <(but not where this would compromise a developments ability to optimise the use of the site);>			Changes suggested to part 1 are not considered to alter the emphasis of the policy and therefore unnecessary. Amend policy S.DH1 Part 1c: reflects have regard to their immediate and wider surroundings. Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name policy S.DH1 (parts 1 e-j) accordingly in the policy and supporting paragraphs.

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1143324		Resolution Property plc	LP821	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	No	Effect ive			Policy S.DH1: Delivering high quality design We recognise the importance of setting out policy requirements for design standards within the Borough. However, the current wording of the policy does not provide scope for buildings of a high design standard that do not reflect the local context but can still contribute to the aim for high quality design within the Borough. We therefore suggest the following amendments to paragraph 1, c and d: 1. Development is required to meet the highest standards of design, layout and construction delete <which respects> and positively responds to its context, town scape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must: c. ensure the architectural language, design details, elements and materials applied on elevations, roof forms and landscapes (including boundary treatment) delete <reflects> insert <have regard to> has regard to their immediate and wider surroundings; d. reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development insert< (but not where this would compromise a developments ability to optimise the use of the site)>;	Yes		Changes suggested to part 1 are not considered to alter the emphasis of the policy and therefore unnecessary. Amend policy S.DH1 (part 1c): reflects have regard to their immediate and wider surroundings. Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; and re-name policy S.DH1 (parts 1 e-j) accordingly in the policy and supporting paragraphs.
635854	Barts Health NHS Trust		LP232	PART 3: POLICIES, 3.4 Paragraph Policy S.DH1: Delivering high quality design	No				Good Design and Local Character and Historic Environment At Regulation 18 stage we objected to the requirement to re-use buildings wherever possible. We welcome the greater flexibility in the Regulation 19 proposed policy but consider the wording to be unclear: "reuse existing buildings with better quality design where feasible and where it would not compromise the quality of development". This wording should be revised got the purposes of clarity.	Yes		Amend policy S.DH1 to delete part 1d: 1d- reuse existing buildings with better quality design where feasible and where it would not compromise the quality of the development; Re-name policy S.DH1 (parts 1e-j) accordingly in the policy and supporting paragraphs.
1105881	Michael Atkins	Port of London Authority	LP314	PART 3: POLICIES, 3.13 Paragraph Policy D.DH2: Attractive streets, spaces and public realm	N/A			7. Policy D.DH2: Attractive streets, spaces and public realm (page 40) The PLA considers that part 1 of this policy should refer to improving connectivity along the river. Currently the Thames Path only extends around part of the Isle of Dogs. As the PLAs Thames vision refers to the joining up of the Thames Path from source to sea – references should be given to the need to maximise any opportunities to improve footpath access along the river.				We consider that this aspiration is already contained in policy D.OWS4: water spaces. A reference to this policy will be added to the policy links section in D.DH2: Insert policy link: Policy D.OWS4: Water spaces

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1142493		Berkeley Group	LP385	PART 3: POLICIES, 3.13 Paragraph Policy D.DH2: Attractive streets, spaces and public realm	No				D.DH2: Attractive streets, spaces and public realm The requirement for all refuse/recycling facilities to be included within the “fabric of the building” may not always be possible. Suggest wording tightened to include “where feasible”. The requirement to provide public art in all developments is onerous. Wording to include “where feasible” or “practical”? Soundness test: Revise to make deliverable and therefore effective	Yes		<p>Our approach to waste management in developments is to seek to ensure that refuse and recycling facilities are incorporated in the building envelope in order to minimise visual and physical obstruction and street clutter in the public realm. This is explained in paragraph 3.22.</p> <p>Policy D.DH2 does not state that public art should be included in all developments. For clarity a reference to public art will be included in paragraph 3.21: signage, and lighting and public art.</p> <p>The glossary will be amended to include a local definition of public art: Fixed artworks which members of the public are able to access and appreciate. Works may be sited in the public, civic, communal or commercial domain, in semi-public or privately owned public space, or within public, civic or institutional buildings. Artworks can form part of the structure or decoration of buildings, landscapes and streetscapes.</p>
1033284	Unknown	One Housing Group	LP394	PART 3: POLICIES, 3.13 Paragraph Policy D.DH2: Attractive streets, spaces and public realm	Yes		Attractive streets, spaces and public realm One Housing supports Policy D.DH2, which requires development to contribute to improving and enhancing connectivity, permeability and legibility across the Borough, ensuring a well-connected, joined-up and easily accessible street network and wider network of public spaces.			Yes		Support for the policy is welcomed.

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635773	Al Mubarakia Ltd		LP204	PART 3: POLICIES, 3.13 Paragraph Policy D.DH2: Attractive streets, spaces and public realm	Yes		Policy D.DH2 (Attractive Streets, Spaces and Public Realm) This policy encourages the principles of permeability and legibility and the principle of improving and enhancing connectivity within the Borough. It states that 'development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough, ensuring a well-connected, joined up and easily accessible street network and wider network of public spaces'. Al Mubarakia support this policy and the principles that it is looking to achieve. The site is located at a prominent intersection with a number of key routes and landmarks located in the immediate surroundings, the site is between Commercial Road to its north and an 'ornamental canal' to the south of the site and beyond to the River Thames. Any future development on-site presents a valuable opportunity to improve accessibility,			Yes		Support for the policy is welcomed.

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							legibility, permeability and connectivity to and from the river. It is considered that the comprehensive redevelopment of the site will open up the area to pedestrians and visitors, serving to revitalize and reanimate a previously underutilized area. Similarly, development here could support improved connections north side of The Highway towards Wapping Woods. We note the shortfall identified in the 'Parks and Open Space Strategy 2017 to 2027 which identifies the neighbouring Shadwell Ward to have a high deficiency of open space in 2031, and the improved connectivity to existing spaces could help ameliorate this deficiency.					
1142656	Rabina Khan		LP536	PART 3: POLICIES, 3.15 Paragraph	No	Positively prepared; Justified; Effective			This objective would be difficult to deliver due to the focus on specific areas as identified in Figure 10. The Central Sub Areas who will see less development would not benefit from improved connectivity, as they are given less attention and it is highly unlikely that transport links would be improved, due to its secondary classification. Section 3.17 of the local plan also suggests that the main focus on the improvement for buses and cyclists thereafter would prioritise pedestrians and vehicles. Equalities Impact Assessment During the Overview and Scrutiny Committee Meeting, held on 14 September, I asked Councillor Blake why a full Equalities Impact Assessment had not been carried out, or mentioned in			Chapter 3 outlines the priorities for the central sub-area which includes improved accessibility, particularly improved walking and cycling routes. Paragraph 3.17 first bullet point: main streets - focusing on movement and prioritising the safe and convenient flow of buses, and cyclists and pedestrians ;

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									the plan. Her response was: "In terms of the Equalities Impact Assessment, we've continually done an impact assessment of equalities through the consultation process that we've been going through, but I think we can come back to you about when the formal Equalities Impact Assessment will take place."			
1142985	Transport for London (TfL)	Transport For London	LP728	PART 3: POLICIES, 3.17 Paragraph	N/A			<ul style="list-style-type: none"> This section requires clarification and update. Whilst it places pedestrians & cyclists at the top of the street user hierarchy, it then ignores pedestrians as prime users for main streets - only buses and cyclists are referenced. Pedestrian traffic on main streets is equally important, both along and across these types of corridors. The impression given by the current wording is that pedestrians don't matter on main streets. This section should be tied more closely to the text included with TfL's Street Types for consistency and comparability. 				Paragraph 3.17 - first bullet point: main streets - focusing on movement and prioritising the safe and convenient flow of buses, and cyclists and pedestrians ;
1141890	Amanda Day		LP21	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environment	No	Effective			In most planning applications heritage is seen as an obstacle to get around, a lack of knowledge among planning officers of heritage makes this pretty easy for even the most inept developer. Policies must actively seek to protect heritage to circumvent decisions by planning officers to weigh up the harm against the benefit mostly in favour of development. The pressures of overdevelopment through building 58,965 new homes by 2031 will make creating distinctive places impossible and destroy any remaining sense of place.			General comment about role of heritage in the planning system and impact on borough's places of meeting the housing target of 58,965 new homes by 2031. This is noted.
1053788	Steve Craddock	The Canal & River Trust	LP351	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environment	N/A			In implementing design policies, we consider that our waterways should be regarded as part of the public realm and that the relationship between waterspaces and adjacent land should be planned in a holistic manner. We welcome the change that has been made to make it clear that section 2 of the policy also applies to the setting of a heritage asset. In assessing the significance of a heritage asset in accordance with this policy, we suggest that consideration should be given to its 'group value'. We also suggest that the assessment of character considers the topography and grain of the heritage asset, as well as the relationship (functional or aesthetic) between different assets. We suggest that this should be added to the supporting text of the policy.				<p>Insert in paragraph 3.27: ...as well as London as a whole through their individual and group value.</p> <p>Insert in paragraph 3.29: ...developments will need to demonstrate an understanding of the significance of the relevant asset or its setting, including the contribution setting makes to its significance, as part of the planning application process. It should also include an assessment of group value, as well as the individual significance of heritage assets. As a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation.</p>

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1142559	Tim Brennan	Historic England	LP443	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environmen t	N/A			To reflect the terminology of the NPPF, we suggest that use of the word 'preserve' is replaced with conserve, and that the term heritage asset is used rather than historic asset. This change can also be made elsewhere in the document. Para 9. To avoid any potential misinterpretation, we recommend the following change to the text: '... and will require any nationally important remains to be conserved permanently in situ, subject to consultation with Historic England'. The current wording could potentially be taken to mean that it would be possible to move archaeological assets to another position on the development site.				Policy S.DH3: part 1: Proposals must preserve conserve or where appropriate enhance the borough's historic -designated and non-designated heritage assets Policy S.DH3: part 2: an historic a heritage asset Policy S.DH3: part 9: nationally important remains to be preserved conserved permanently at the site in situ ,
1049487		Ashbourne Beech Property	LP102	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environmen t	No	Consi stent with natio nal policy			Policy S. DH3. The policy which relates to heritage and the historic environment should reflect the advice at section 12 of the NPPF, particularly paragraphs 132 – 138 relating to consideration of the impact of a proposal on designated and non-designated heritage assets. The policy should be re-ordered so that it address designated heritage assets before focusing generally on heritage assets.	Yes		This wording of the policy (S.DH3) has been discussed and agreed with Historic England. It is considered to fully respond to the NPPF in relation to designated and non-designated assets by stating that proposals must be developed "in a manner appropriate to their significance". No changes are proposed to the policy wording in response to the representation.
1142493		Berkeley Group	LP391	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environmen t	No				S.DH3: Heritage and the historic environment Remove the word 'non-designated' from Policy S.DH3, and part 2(c) and/or change 'must' in the first line to 'should seek to'. Make parts (2) and (3) consistent by removing part 2c Soundness text: Revise to make deliverable and therefore effective	Yes		This wording of the policy (S.DH3) has been discussed and agreed with Historic England. It is considered to fully respond to the NPPF in relation to designated and non-designated assets by stating that proposals must be developed "in a manner appropriate to their significance". The policy seeks to ensure that developments make a positive improvement to the historic environment in the borough through the improvement of heritage assets and their settings through the planning application process. No changes are proposed to the policy wording in response to this representation.
1143324		Resolution Property plc	LP822	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic	No	Effect ive			We support the content of Policy S.DH3. (heritage and the historic environment). However, the current wording of the policy does not account for the variation in. We therefore suggest an amendment to the wording of paragraph 6 of the policy. 6. Delete <Significant> insert <Appropriate> weight will be given to the protection and enhancement of the borough's conservation areas, including their setting.	Yes		We do not agree with this change as this would undermine the policy objective which is to ensure that the borough's conservation areas are protected and enhanced. The term 'significant' has legal meaning in a heritage context (Planning (Listed Building and Conservation Areas) Act 1990 Section 72 requires these areas to be given special consideration).

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				environment								
635451	National Grid Property Holdings		LP177	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environment	No	Positively prepared; Justified; Effective; Consistent with national policy			Part 1 of this policy requires that proposals must preserve or where appropriate enhance designated and non-designated heritage assets in a manner appropriate to their significance. This part of the policy is overly prescriptive, particularly in the context of 'non-designated' heritage assets. It is not positively prepared as it potentially places restrictions on the need to meet housing requirements in the Borough and nor is it flexible enough to be justified or effective, as this policy could place a significant burden on a number of allocated sites and could restrict the future development potential of these sites in the context of the reference to non-designated heritage assets. In addition, Part 2 of the policy sets out circumstances where proposals to alter, extend or change the use of a historic asset, will only be permitted in certain circumstances. Part c of this policy confirms that there is a requirement for proposals to "enhance or better reveal the significance of their settings". This conflicts with later parts of the policy (and National Policy), which confirms that any harm to the significance of a heritage asset must be justified having regard to its wider public benefits. This is not consistent and needs to be amended accordingly. Remove reference to 'non-designated' in part 1 of the policy and remove part 2(c).	Yes		This wording of the policy (S.DH3) has been discussed and agreed with Historic England. It is considered to fully respond to the NPPF in relation to designated and non-designated assets by stating that proposals must be developed "in a manner appropriate to their significance". The policy seeks to ensure that developments make a positive improvement the historic environment in the borough through the improvement of heritage assets and their settings through the planning application process. No changes are proposed to the policy wording in response to this representation.
635854	Barts Health NHS Trust		LP233	PART 3: POLICIES, 3.25 Paragraph Policy S.DH3: Heritage and the historic environment	No				Tall Buildings Generally we welcome the greater flexibility afforded by this draft policy compared with the Regulation 18 stage. We also welcome the criteria for the assessment of tall buildings proposals outside of the tall building locations that are delineated on the draft policies map. One of the criteria is that a tall building would "unlock significant infrastructure constraints". We seek confirmation that 'infrastructure' has the broad meaning used elsewhere in the local plan and includes, for example, strategic open space. We also suggest that it be recognised that tall buildings may permissible (subject to design etc criteria) when they are needed to unlock strategic developments and, so, to deliver other important development plan objectives. Given that the draft local plan notes at paragraph 3.64 that: "Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building", we consider that paragraph 3.67 ought to be re-worded to avoid any confusion. At present it says that "Proposals involving tall buildings (90 metres in height or greater) must be referred to the Civil Aviation Authority and London City Airport...". This could be misconstrued as defining a tall building as a building that is 90 m or taller. We suggest that this be re-worded as follows: "Where a proposed building	Yes		Support for the policy is welcomed.

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									would be 90 metres in height or greater the planning application must be referred to the Civil Aviation Authority and London City Airport...".			
1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP187	PART 3: POLICIES, 3.29 Paragraph	No	Justified; Effective; Consistent with national policy			Balfron Tower is a Grade II listed building and therefore a designated heritage asset. This means it is protected by statute (Section 66 (1) of the P(LBCA) Act 1990). This is reinforced by the NPPF, para 129, and draft Local Plan Policy S. DH3. It is clear that a very robust legal and policy framework is in place to protect the setting of the Balfron Tower. It is not appropriate and it is unnecessary to introduce the designation of the Balfron Tower as a Local Designated Landmark as defined in proposed policy D.DH4. This conflicts with the NPPF in terms of what is defined as 'designated' which states 'A world heritage site, Scheduled Monument, Listed building, Protected Wreck Site, Registered park and garden, Registered Battlefield or Conservation Area designated under the relevant legislation' (Annex 2 of the NPPF) and supporting paragraph 3.32 of the draft Local Plan which states "designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas". In addition, the Local/Borough Designated Landmarks are all listed buildings and adequate protection for their setting is already provided by Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. A consistent approach is also not taken to the description as 'borough designated landmark' and 'local designated landmark' are referred to within the Local Plan and on the proposals map. In this context, the additional layer to the protection proposed causes confusion with National Policy and is unnecessary. The views identified in policy DH4 are not effective or justified for the reasons summarised below and which are set out in full in the accompanying letter: - the borough-designated views included in figure 7 are not clearly defined. They are also labelled differently within Figure 7 and on the Proposals Map (Viewpoint 6 and 2 respectively). - Viewpoint 6/2 is taken from the centre of the carriageway where traffic is eastbound. Views of Balfron Tower and the Canary Wharf Skyline are seen westwards from this location and are not visible from the view location identified on the Proposals Map. - Even if the location of viewpoint 6/2 was altered to the pavement and looking westwards, we consider the inclusion of viewpoint 6/viewpoint 2 unnecessary as it is not a highly sensitive view that can be valued by many people. There are numerous views towards Balfron Tower which this is only one of. We also note supporting paragraph 3.29 requires that "developments will need to demonstrate an understanding of the significance of the relevant asset or its setting as part of the planning application process" we consider this should			Borough designated landmarks and views have been derived from the evidence base documents that are listed to support the policy. Justification for this approach will be further explained through the Views and Landmarks Topic Paper (SED15) to support the examination. The basis for identifying borough-designated landmarks is contained in the Conservation Area Character Appraisals and Management Plans. Balfron Tower is significant in views from multiple conservation areas. Insert into paragraph 3.29: ...developments will need to demonstrate an understanding of the significance of the relevant asset or its setting , including the contribution setting makes to its significance, as part of the planning application process. It should also include an assessment of group value, as well as the individual significance of heritage assets. As a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation.

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									be reworded as setting shouldn't be seen separately from significance. In order to make Policy S.DH.3 Sound part 2 of the policy to be amended as follows:"2. Proposals to alter, extend or change the use of an historic asset or proposals that would affect the setting of a heritage asset will only be permitted where: a. they safeguard the significance of the heritage assets, including its setting, character, fabric or identify; b. they are appropriate in terms of design, height, scale, form, detailing and materials in their local context; c. they enhance or better reveal the significance of assets or their settings; d. DELETE <they preserve strategic and locally important views, as defined in policy D.DH4;> and e. in the case of a change of use from a use for which the building was originally designed, a thorough assessment of the practicability of retaining its existing use has been carried out outlining the wider public benefits of the proposed alternative use. Paragraph 3.29 to be amended to state: 3.29 In order to satisfy the criteria set out in parts 2-9, developments will need to demonstrate an understanding of the significance of the relevant asset INSERT < including the contribution setting makes to its significance> or its setting as part of the planning application process. As a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation. The borough has a local history library, which provides a useful resource. Research undertaken into the heritage asset affected should describe the significance of the heritage asset in sufficient detail to determine its historic, archaeological, architectural or artistic interest to a level proportionate to its importance. The Greater London Historic Environment Record will help inform whether a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest.			
1141834	Peter Marsden		LP630	PART 3: POLICIES, 3.30 Paragraph	N/A			We recommend that that ICOMOS guidance on heritage impact assessments also be referenced in Explanation para. 3.30 (page 42) as follows: Detailed plans to an appropriate level will need to be submitted with applications as part of design and access statements/heritage statements to demonstrate how the heritage assets and its setting will be impacted and to ensure that its significance is protected or enhanced. INSERT < In the case of applications within or affecting a World Heritage Site, heritage impact assessments should			No response - duplicated comment	

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							be prepared in accordance with ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, January 2011.>				
1141834	Peter Marsden		LP633	PART 3: POLICIES, 3.30 Paragraph	N/A		We recommend that that ICOMOS guidance on heritage impact assessments also be referenced in Explanation para. 3.30 (page 42) as follows: Detailed plans to an appropriate level will need to be submitted with applications as part of design and access statements/heritage statements to demonstrate how the heritage assets and its setting will be impacted and to ensure that its significance is protected or enhanced. INSERT < In the case of applications within or affecting a World Heritage Site, heritage impact assessments should be prepared in accordance with ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, January 2011.>				Insert into policy S.DH5 - Evidence links Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, January 2011)

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1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP185	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No	Justified; Effective; Consistent with national policy			Balfron Tower is a Grade II listed building and therefore a designated heritage asset. This means it is protected by statute (Section 66 (1) of the P(LBCA) Act 1990). This is reinforced by the NPPF, para 129, and draft Local Plan Policy S. DH3. It is clear that a very robust legal and policy framework is in place to protect the setting of the Balfron Tower. It is not appropriate and it is unnecessary to introduce the designation of the Balfron Tower as a Local Designated Landmark as defined in proposed policy D.DH4. This conflicts with the NPPF in terms of what is defined as 'designated' which states 'A world heritage site, Scheduled Monument, Listed building, Protected Wreck Site, Registered park and garden, Registered Battlefield or Conservation Area designated under the relevant legislation' (Annex 2 of the NPPF) and supporting paragraph 3.32 of the draft Local Plan which states "designated heritage assets include listed buildings and structures, registered parks and gardens and conservation areas". In addition, the Local/Borough Designated Landmarks are all listed buildings and adequate protection for their setting is already provided by Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. A consistent approach is also not taken to the description as 'borough designated landmark' and 'local designated landmark' are referred to within the Local Plan and on the proposals map. In this context, the additional layer to the protection proposed causes confusion with National Policy and is unnecessary. The views identified in policy DH4 are not effective or justified for the reasons summarised below and which are set out in full in the accompanying letter: - the borough-designated views included in figure 7 are not clearly defined. They are also labelled differently within Figure 7 and on the Proposals Map (Viewpoint 6 and 2 respectively). - Viewpoint 6/2 is taken from the centre of the carriageway where traffic is eastbound. Views of Balfron Tower and the Canary Wharf Skyline are seen westwards from this location and are not visible from the view location identified on the Proposals Map. - Even if the location of viewpoint 6/2 was altered to the pavement and looking westwards, we consider the inclusion of viewpoint 6/viewpoint 2 unnecessary as it is not a highly sensitive view that can be valued by many people. There are numerous views towards Balfron Tower which this is only one of. We also note supporting paragraph 3.29 requires that "developments will need to demonstrate an understanding of the significance of the relevant asset or its setting as part of the planning application process" we consider this should be reworded as setting shouldn't be seen separately from significance. Remove 'Borough Designated Landmark/ Local Designated Landmark/landmark			Designations and views have been derived from the evidence base documents that support the policy. Justification for this approach is further explained through the Views and Landmarks Topic Paper (SED15) to support the examination. The Policies Map will be updated to reflect numbering and labels in figure 7 of borough designated views.

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									buildings' from Policy D.DH4 and S.DH1 and supporting paragraphs (3.44, 3.46, 3.47, 3.8). Remove 'Borough Designated Views' from DH4 (and where it is referred to in other policies i.e. DH1). To make policy D.DH4 Sound policy D.DH4 to be amended as follows: Policy D.DH4: Shaping and managing views 1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. DELETE <Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted.> Development will be required to demonstrate how it: a. complies with the requirements of the London View Management Framework and World Heritage Site Management Plans (Tower of London and Maritime Greenwich); b. positively contributes to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf (as defined as the Policies Map); DELETE <c. preserves or enhances the prominence of the borough-designated landmarks and the skyline of strategic importance in the borough-designated views (as defined in figure 7);> d. preserves or enhances local views identified in conservation area appraisals and management guidelines; e. preserves or enhances visual connection of the public realm with water spaces; and f. enhances townscape and other local views which are important to the identity and character of the place. INSERT new criteria: <f. Applications for development that may affect the landmark status of listed buildings and that would be seen together with the Canary Wharf Skyline will require a townscape and visual assessment. including AVR's (the scope of which to be agreed with the Council) to test their acceptability >			
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP317	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	Yes		This policy requires development to positively contribute to views and skylines that are components of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. There is a requirement for developments to demonstrate how they comply with the requirements of LVMF and World Heritage Site			Yes		Support for the policy is welcomed.

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							Management Plans, this is supported and is in accordance with the London Plan.					
1054236	EID Partners hip		LP340	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			We support that development should positively contribute to views and skylines, but we suggest that all views ought to be capable of acknowledging change and new tall structures arriving within them where these do not give rise to significant harm. The policy wording as drafted does not attribute hierarchical importance to views, and we suggest that the greatest weight should be given to London View Management Framework views such as the view from Maritime Greenwich. We suggest that the following text amendments should be made to the policy wording: 1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive Harmful elements in the foreground, middle ground and backdrop of such views will be resisted.			LVMF and WHS Management Plans are referred to in part a of the policy, implying that it is at the top of the hierarchy in terms of protecting strategic views. These views are given a high level of protection in the London Plan. No change to the policy is required. The glossary makes clear that 'intrusive elements' relates to "elements harmful for the designated view" so no change is required.	
1143156	Hondo Enterprises	Hondo Enterprises	LP764	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			This policy requires development to positively contribute to views and skylines that are components of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. There is a requirement for developments to demonstrate how they comply with the LVMF and World Heritage Site Management Plans, this is embraced and is in accordance with the London Plan.			Support for the policy is welcomed.	
1143156	Hondo Enterprises	Hondo Enterprises	LP765	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	Yes		The objectives of this policy are generally supported. This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings. Part j of the policy				Support is welcomed. Paragraph 3.66 in the supporting text discusses how it should be demonstrated that adverse impacts on microclimate will be mitigated. No change to the policy is required. This will be addressed through the development management process and therefore no change to the policy is required.	

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						<p>should acknowledge that the effects of development on microclimate and amenity of the proposals site and the surrounding area can be mitigated and it can be demonstrated that the significant public benefits of proposals can justify additional height subject to detailed design and impact on townscape and heritage and can outweigh any impacts. It would be unrealistic to expect any development to not have any impact upon its surroundings. The inclusion of East Ferry within the Millwall Inner Dock (Isle of Dogs) Tall Building Zone is fully supported and considered entirely appropriate. The addition of a cluster of taller buildings in this location is encouraged and meets the aspirations of the OAPF.</p>					

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624580	Jason Larkin	Canary Wharf Group Plc	LP508	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No	Positively prepared; Justified			The language applied to the management of views in draft policy D.DH4 is that usually used in relation to heritage assets – i.e. ‘preserve or enhance’. While heritage assets can be an important component in views, care needs to be taken to ensure that views themselves are not treated as heritage assets. Where such language is used in, for example, the ‘London View Management Framework’ (“LVMF”) dated 2012, it is used in respect of heritage assets within the views, rather than the views overall. It is unclear what part (f) of the policy refers to. Are these views that are neither a borough designated view nor a local view identified in a conservation area appraisal? If so, what criteria are used to define these views? Similar to our comments on part (e) of draft policy S.DH1 above, this is too general and should be deleted. Figure 6 which accompanies this policy is confused and confusing. It is not clear if the dotted white lines relate to the division between foreground, middle ground and background within the view, or between the ‘landmark’ and ‘skyline’. If the former, the division seems to relate more to vertical location within the image rather than the sense of depth and perspective that a viewer would experience – the ‘background’ is defined in the figure as the top part of the view, in the sky, rather than a background layer within the view that would be perceived as being further away from the viewpoint than the middle ground. Nowhere in the Draft Local Plan (or the ‘Conservation Strategy 2017’ or ‘Tall Buildings Study 2017’) are any local views described properly or assessed. For instance, we have not been able to find precise details of where the views are taken from and what they contain or proper guidance for what the views are seeking to protect and criteria for development in those views. We would reiterate our comment from the Regulation 18 consultation that having a proper understanding of how these views will be applied is critically important given that virtually all of them cross the Opportunity Areas where the majority of growth is planned. It is difficult to comment further until this evidence is provided, however there could be a clear conflict between “preserving” or “enhancing” locally important views and Council’s Vision for growth within the Opportunity Areas. It is also necessary to consider the effect of committed but as yet un-built or under construction development within these views and what impact this has on those features that the views are trying to protect, including the “skyline of strategic importance”. Images of the “skyline of strategic importance” as set out on pages 47 and 194 of the ‘Tall Buildings Study’ (2017) make no allowance or recognition of the fact other tall buildings at Canary Wharf are coming forward (for example 1 and 10 Bank Street, Wood Wharf) and that these will change the			Other local views (part 1f) will be identified on a case-by-case basis as part of the development management process. Paragraph 3.51: Insert after unique places. These will be identified on a case by case basis through the townscape analysis in relation to a particular development. Figure 6 is an indicative diagram intended to aid the understanding of how the impact of developments on views will be assessed. No changes are considered necessary. Local views have been identified and assessed through the Conservation Area Character Appraisals and Management Guidelines which are referenced in part 1d of policy D.DH4, paragraph 3.48 and the evidence links. No changes to the policy are necessary. The supporting text to policy D.DH6 (paragraph 3.65) relating to the assessment of applications for tall buildings will be amended: An architectural model may be required depending on the scale and nature of the proposal, including an assessment of the cumulative impact of nearby proposals with valid planning permission.

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								skyline. A "Skyline of strategic importance" is shown on Figure 7: 'Key views, landmarks and the skyline of strategic importance' of the Draft Local Plan, however this just shows a large area over Canary Wharf including areas where there will never be built development. As it stands therefore draft policy D.DH4 is not sound. Given the impact it could have on the delivery of development within the Opportunity Areas we would question if it was positively prepared. In addition, given the deficiencies identified above with properly describing or assessing the local views, the policy is not founded on a robust evidence base and therefore not justified			
1142716	Lyca Group		LP693	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A		We support that development should positively contribute to views and skylines, but we suggest that all views ought to be capable of acknowledging change and new tall structures arriving within them where these do not give rise to significant harm. The policy wording as drafted does not attribute hierarchical importance to views, and we suggest that the greatest weight should be given to London View Management Framework views such as the view from Maritime Greenwich. We suggest that the following text amendments should be made to the policy wording: 1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. DELETE<Intrusive> INSERT< Harmful >elements in the foreground, middle ground and backdrop of such views will be resisted. We thank you again for considering these representations and we would welcome a broader dialogue with officers to ensure that the potential of both Lyca Group's Thames Quay site, and the wider Canary Wharf area are captured in the emerging plan. We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet. Please do not hesitate to contact us on the details at the head of this letter should you require any further information.				LVMF and WHS Management Plans are referred to in part a of the policy, implying that it is at the top of the hierarchy in terms of protecting strategic views. These views are given a high level of protection in the London Plan. No change to the policy is required. The glossary makes clear that 'intrusive elements' relates to "elements harmful for the designated view" so no change is required.

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1105881	Michael Atkins	Port of London Authority	LP315	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			The PLA supports the reference in policy D.DH4 in regards to the preservation and enhancement of the visual connections of the public realm with water spaces, as well as the further justification provided in paragraphs 3.49 & 3.50.				Support for the policy is welcomed.
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP958	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No				Policy D.DH4 (Shaping and managing views) We support that development should positively contribute to views and skylines, but we suggest that all views ought to be capable of acknowledging change and new tall structures arriving within them where these do not give rise to significant harm. The policy wording as drafted does not attribute hierarchical importance to views, and we suggest that the greatest weight should be given to London View Management Framework views such as the view from Maritime Greenwich. We suggest that the following text amendments should be made to the policy wording: 1. Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. DELETE <Intrusive> INSERT <Harmful> elements in the foreground, middle ground and backdrop of such views will be resisted.			LVMF and WHS Management Plans are referred to in part a of the policy, implying that it is at the top of the hierarchy in terms of protecting strategic views. These views are given a high level of protection in the London Plan. No change to the policy is required. The glossary makes clear that 'intrusive elements' relates to "elements harmful for the designated view" so no change is required.
1142559	Tim Brennan	Historic England	LP444	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			Policies S.DH3 heritage & the historic environment and D.DH6 tall buildings should be added to the policy links section.				A decision was taken not to include links to policies in the same chapter as all policies within the same chapter should be considered as a whole. The policy references only include references to policies in other chapters where these are particularly relevant to the application of a particular policy.
1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP884	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No	Effective; Consistent with national policy			Proposed Policy D.DH4 seeks to introduce local views, landmarks and the skyline of strategic importance (the Core of the Canary Wharf Estate). The proposed designations are in addition to considerations relating to the setting of heritage assets and how development might appear in the backdrop of London View Management Framework views. The policy is directly informed by the following documents: · London View Management Framework (Mayor of London, 2012) · Maritime Greenwich Site Management Plan · Tower of London World Heritage Site Management Plan · London Borough of Tower Hamlets: Conservation Area Appraisals and Management Guidelines · Conservation Area Appraisal and Management Guidelines for Fish Island and White Post Lane Conservation Area (London Legacy Development Corporation) · Tower Hamlets Tall Buildings Study The Tower Hamlets Tall			Local views and landmarks have been identified and assessed through the Conservation Area Character Appraisals and Management Guidelines which are referenced in part 1d of policy D.DH4, paragraph 3.48 and the evidence links. No change to the policy is required. Local/borough views and landmarks have been defined through the evidence base documents. Other local views will be identified on a case-by-case basis through the development management process. This will be clarified in paragraph 3.51 after unique places: Insert after unique places. These will be

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								<p>Building Study (2017) was published in September 2017, no consultation was held in relation to this document. The Tall Building Study identifies landmarks and local views on Page 48. However, there is no justification as to why the landmarks and local views have been identified. Policy D.DH4 replicates the landmarks and local views as identified within the Tower Hamlets Tall Buildings Study. The policy does not discuss the interpretation of the views, nor identify a viewing corridor. On the basis of this, we do not consider the policy to be sound by virtue of the lack of justification for the inclusion of the local views and landmarks and analysis of this impact of the policy on the achievement of wider Local Plan objectives and the extent of conformity with the London Plan. In respect of the proposed wording, we acknowledge the importance of development falling within the parameters of the London View Management Framework and consider the reference acceptable. However, Part (b) of the Policy D.DH4 requires that development demonstrates how it positively contributes to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf. In doing so, building heights are expected to significantly drop towards the boundary and the heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area. Whilst it has been a longstanding position for LBTH that the height should step down away from 1 Canada Square we do not consider that the use of 'significantly lower' facilitates the Borough achieving objectives of national policy nor local requirements in relation to meeting needs (including employment and residential floorspace. This is particularly in relation to the national direction in relation to the delivery of high density development adjacent to transport termini. In addition, we consider that proposed Policy D.DH4 would be in conflict with the Isle of Dogs and Poplar Opportunity Area and the objectives of delivery within opportunity areas as set out within the London Plan. As such, it would not be effective for NPPF purposes nor would it be in conformity with the strategic development plan for the purposes of Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework 2012 sets out the test of soundness which a development plan will be assessed against. Therefore, given the above, we do not consider that Policy D.DH4 meets these tests.</p>			<p>identified on a case by case basis through the townscape analysis in relation to a particular development.</p> <p>The council's approach to identifying important views is detailed further in the Views and Landmarks Topic Paper (SED15) submitted to support the examination.</p>

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP919	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			This policy requires development to positively contribute to views and skylines that are components of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. There is a requirement for developments to demonstrate how they comply with the requirements of L VMF and World Heritage Site Management Plans, this is welcomed and is in accordance with the London Plan. Part (b) of this policy however requires developments to positively contribute to the skyline of strategic importance. The explanation to part (b) of this policy, set out within paragraph 3.45, states that heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area. This part of Policy D.DH4 has not been positively prepared and fails to take into account the provisions of proposed Policy S.SG 1 which directs the majority of growth to the Isle of Dogs and South Poplar Opportunity Area. With the majority of growth directed to the area, it is ineffective to restrict development in the surrounding area to heights of those already existing; it is inevitable that growth for housing and employment opportunities will require heights in excess of those already in existence on the edge of the strategic skyline designation area. There a significant amount of tall buildings granted consent or under construction on the Isle of Dogs and the policy fails to reflect this position. Furthermore, significant areas, such as at the Westferry Printworks site, sit adjacent to the designated skyline of strategic importance yet are also within a designated Tall Building Zone. The provisions of part (b) of Policy D.DH4 is therefore in conflict with the Tall Building Zones designated in Policy D.DH6. Paragraph 3.45 of this policy also states that the skyline of strategic importance 'covers the tall building				The comments are noted. The extent of the boundary of the skyline of strategic importance will be explored further through the examination in public.

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								zones in Canary Wharf: Canary Wharf Cluster and the Millwall Inner Dock Cluster'. However the skyline of strategic importance shown on the Policies Map and in Figure 7 of the Local Plan does not extend to the entirety of the Millwall Inner Dock Cluster Tall Building Zone that is identified on the Policies Map. It is requested that the London Borough of Tower Hamlets clarify the extent of the skyline of strategic importance and that Part (b) of this policy is deleted.				
1142691		Alliance Property Asia	LP602	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	Yes		POLICY D.DH4: SHAPING AND MANAGING VIEWS This policy requires development to positively contribute to views and skylines that are components of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. There is a requirement for developments to demonstrate how they comply with the requirements of LVMF and World Heritage Site Management Plans, this is supported and is in accordance with the London Plan. Note: No soundness test undertaken.			Yes		Support for the policy is welcomed.

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1049487		Ashbourne Beech Property	LP103	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No	Justified			Policy D.DH4. The policy focuses on views and skylines in the borough. It states that development is to “positively contribute to views and skylines that are the components of the character of the 24 places in Tower Hamlets.” Figure 7, p47, identifies key views landmarks and the skyline of strategic importance. It is not clear, however, where the views and skylines of the 24 places in Tower Hamlets are? As worded the policy is imprecise in what it requires. Part b of the policy requires that development demonstrate how it positively contributes to the skyline of strategic importance “...forming from the silhouettes of tall building clusters around Canary Wharf (as defined on the Policies Map).” Paragraph 3.45 states that the cluster is visible across London and a globally recognised silhouette. The area covers the tall building zones in Canary Wharf: Canary Wharf Cluster and the Millwall Inner Dock Cluster. Building heights within the designation area are to “significantly drop” towards its boundaries. It is not clear how the skyline of strategic importance has been defined. It is also not clear the extent to which building heights are to drop towards its boundaries. It is also evident from Figure 8, p53, that the cluster does not encompass the entirety of the Millwall Inner Dock Cluster.	Yes		The source for these views is the Conservation Area Character Appraisals and Management Guidelines. These are referenced in part 1d policy D.DH4, paragraph 3.48 and the evidence links - therefore no change is considered necessary. The council's approach to identifying important views is further explained through the Views and Landmarks Topic Paper (SED15) submitted to support the examination. The skyline of strategic importance is a new definition in this plan and is explained in paragraph 3.45. The extent of the boundary of the skyline of strategic importance will be explored further through the examination in public.
1142590		British Airways plc	LP473	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	N/A			Skyline of Strategic Importance In addition, we provide support towards the site's allocation within the Skyline of Strategic Importance, reflecting its central point with the Canary Wharf tall buildings zone. As such, we support Policy D.DH4 which states that development should positively contribute to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf and supporting text on paragraph 3.45.			Support for the policy is welcomed.	
1142365		Newport Holdings Ltd	LP217	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport	Yes		The wording of the policy is consistent with current London Plan policy 7.4 and there is no justification for a change.

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									<p>Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Chapter 3: Creating Attractive and Distinctive Places Draft Policy D.DH4: Shaping and Managing Views Draft Policy D.DH4 states that development must 'positively contribute to views and skylines'. We consider this wording should be amended to state 'development is required to preserve or enhance identified local and strategic views and skylines'. This would accord with the London Plan, where the requirement in relation to strategic views is to protect the vista (rather than positively contribute to it), and the key statutory test to conserve or enhance heritage assets. It would also reflect previous drafts of the LBTH Local Plan which stated that development should 'preserve views'. The amended wording would, for example, support development that is designed so as not to be visible in a key view, or visible but with no adverse impact i.e. meeting the purpose of protecting these views, while avoiding a negative policy test where proposals are not considered to positively contribute to that view in some way, without any guidance on how they might do so. (Summary of letter in its entirety). In order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.</p>			
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP894	PART 3: POLICIES, 3.43 Paragraph Policy D.DH4: Shaping and managing views	No				<p>Policy D.DH4: Shaping and managing views This policy requires development to positively contribute to views and skylines that are components of the 24 places in Tower Hamlets as identified in figure 4. Huntingdon Industrial Estate falls within the Shoreditch area and Fleet Street Hill falls within the Bethnal Green area. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. There is a requirement for developments to demonstrate how they comply with the requirements of LVMF and World Heritage Site Management Plans, this is embraced and is in accordance with the London Plan.</p>			Support for the policy is welcomed.

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1141834	Peter Marsden		LP634	PART 3: POLICIES, 3.44 Paragraph Policy S.DH1: Delivering high quality design	N/A			The text at para 3.44 (page 45) referring to two World Heritage Sites is incorrect. This should be amended a follows: Part a refers to strategic views identified in the London Views Management Framework and INSERT <Tower of London and Maritime Greenwich World Heritage Sites Management Plans > which have impacts on developments within Tower Hamlets.			Insert into paragraph 3.44: strategic views identified in the latest versions of the London Views Management Framework and Tower Hill of London and Maritime Greenwich Meantime World Heritage Site Management Plans.	
1141834	Peter Marsden		LP635	PART 3: POLICIES, Figure 6 :Views in context	N/A			Figure 6: Views in context (page 45) portrays an image of the London skyline from Greenwich Park (along the Grand Axis). This image is out of date and does not reflect the current level of tall buildings in existence or under development and does not show the migration of tall building westwards from One Canada Square.			The diagram is not specific to a place and/or time and therefore the image is adequate for the purpose it is intended for. No change is considered necessary.	
1141834	Peter Marsden		LP636	PART 3: POLICIES, 3.51 Paragraph	N/A			Bullet point 2 of Evidence Links 9page 46 should read: • Maritime Greenwich World Heritage Site Management Plan, Third Review, 2014.			Evidence links Insert World Heritage Site Management Plan	
1054236	EID Partners hip		LP341	PART 3: POLICIES, Figure 7 : Key views, landmarks and the skyline of strategic importance	N/A			Further, in respect of the viewpoints shown in Figure 7, the text supporting this image should be clear that in the context of two tall building clusters, the local views are capable of accommodating change and tall buildings.			Tall buildings will be assessed against the criteria in policy D.DH6 and other design and heritage policies. The wording of policy D.DH4 which requires development to "positively contribute to views and skylines" makes clear that change will take place within local views. In relation to figure 7 the supporting text in paragraph 3.45 already makes reference to the requirement for development to be tested against these views. No changes are considered to be necessary.	
1141834	Peter Marsden		LP637	PART 3: POLICIES, 3.55 Paragraph	N/A			We welcome the inclusion of a specific policy relating to London World Heritage Sites and references to the Maritime Greenwich World Heritage Site (WHS) Management Plan Explanation Para. 3.55 (page 48) should be amended to read: Maritime Greenwich lies immediately south of the borough and comprises an ensemble of buildings INSERT < (including the Queen's House, the Royal Observatory and the Royal Hospital for Seamen (today the Old Royal Naval College) > set in landscaped parkland (part of the buffer area lies within the borough at Island Gardens on the Isle of Dogs, as shown on figure 7).			Insert into paragraph 3.55: (including the Queen's House , Royal Palace , Royal Hospital and the Royal Observatory and the Old Royal Naval College)	

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1142186	Andrew Wood	Isle of Dogs NP Forum	LP130	PART 3: POLICIES, 3.58 Paragraph	No	Effective			While the new Tall Building Zone more clearly delineates the areas for tall buildings and uses the phrase 'should drop away from the central location at 1 Canada Square' it is not clear how that should be interpreted. Given the existence of buildings like Baltimore Wharf (45 stories), some distance away from One Canada, a more detailed and clear policy would be useful to avoid an interpretation allowing a plateau effect rather than a drop away.	Yes		Further guidance on acceptable heights in the Canary Wharf tall building zone is contained in policy D.DH6 (part 2) and the Tall Building Study that forms part of the evidence base to policy D.DH6. No changes are considered to be necessary.
1033229	Paul Burley	Montagu Evans LLP	LP42	PART 3: POLICIES, 3.58 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Tall Buildings Generally we welcome the greater flexibility afforded by this draft policy compared with the Regulation 18 stage. We also welcome the criteria for the assessment of tall buildings proposals outside of the tall building locations that are delineated on the draft policies map. One of the criteria is that a tall building would "unlock significant infrastructure constraints". We seek confirmation that 'infrastructure' has the broad meaning used elsewhere in the local plan and includes, for example, strategic open space. We also suggest that it be recognised that tall buildings may be permissible (subject to design etc criteria) when they are needed to unlock strategic developments and, so, to deliver other important development plan objectives. Given that the draft local plan notes at paragraph 3.64 that: "Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building", we consider that paragraph 3.67 ought to be re-worded to avoid any confusion. At present it says that "Proposals involving tall buildings (90 metres in height or greater) must be referred to the Civil Aviation Authority and London City Airport...". This could be misconstrued as defining a tall building as a building that is 90 m or taller. We suggest that this be re-worded as follows: "Where a proposed building would be 90 metres in height or greater the planning application must be referred to the Civil Aviation Authority and London City Airport...".	Yes		Agree with change to policy D.DH6 (part 3) and amend as follows: In such locations, tall buildings will be expected to serve as landmarks and unlock significant strategic infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities, new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area) to address existing deficiencies within the area and future needs (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies) Such a change (tall buildings being permissible where they are needed to unlock strategic developments) may imply that viability considerations can override design and amenity considerations for a particular site and are therefore not accepted. Amend paragraph 3.67: Proposals involving tall buildings {90 metres in height or greater} must be referred to the Civil Aviation Authority and London City Airport... (delete parentheses).

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1130948	Adam Price	Transport for London	LP289	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Consistent with national policy			<p>Policy D.DH6: Tall Buildings We note that part 2 of this policy directs the development of tall buildings to designated "Tall Buildings Zones", as indicated in Figure 8 (page 53), and which include Canary Wharf and Blackwall. While we acknowledge the fact that this designation does not mean that tall buildings will automatically be rejected in areas outside of these zones, and instead such proposals would be considered against the criteria set out under part 3 of this policy (which, in principle is supported for the wider borough), we are of the view that the designated Tall Building Zones, as currently shown, are inconsistent with other Local Plan objectives and are at odds with the contents of the Tall Buildings Study (2017). The limited extent of the Tall Building Zones within the Isle of Dogs and Poplar areas does not respond to borough or Mayoral objectives to provide significant housing growth in this area, as earlier referenced (a minimum number of 29,848 additional homes need to be provided in the Isle of Dogs and South Poplar subarea (p62 of the Local Plan)). In particular, we have serious concerns that the Aspen Way site allocation does not fall within either of the adjoining Tall Buildings Zones (Canary Wharf or Blackwall) when it is anticipated that significant growth is to be achieved in this location. Out of the two, it would seem most appropriate for the boundary of the Blackwall Tall Buildings Zone to be extended to include the Aspen Way site, which is typically formed of a similar character. As a site which forms part of the emerging Isle of Dogs Opportunity Area, and which is identified as an area of key housing growth in the borough (Figure 10, page 64), sufficient flexibility and assurance must be provided in the Local Plan in order to deliver on this objective. As such, we request that the Aspen Way site is brought into the Blackwall Tall Buildings Zone for the reasons set out above.</p>			The Tall Building Study considered the place of Blackwall and did not consider the Aspen Way site allocation area as appropriate as a tall building zone due to its limited connectivity and adjacent conservation areas and lower height buildings.

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1054534	Angelic Interiors Limited	Angelic Interiors Limited	LP221	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No			AIL has land interests in the area identified below ("the Site"), which is bounded by East Ferry Road to the east, Marsh Wall to the north west and Chipka Street to the south. Building heights Consistent with the proposal to include the Site within the Site Allocation 4.4, AIL proposes that the Millwall Inner Dock tall building zone in Policy D.DH6 "Tall buildings" should be extended to include the Site. AIL recognises that the Site is located at a transition between the tall buildings area of Canary Wharf and the lower rise buildings of Cubitt Town. However, it considers that there is potential to develop the Site for a tall building that helps to demonstrate the stepping down of building heights from the Canary Wharf cluster. Density The GLA is due to publish a revised draft London Plan for consultation on 29th November 2017. It is understood to propose an alternative approach to determining appropriate densities of development, which is believed to include the removal of the current density matrix at Table 3.2 of the current plan. AIL suggests that the approach of Policy DH6 to determining densities should be reviewed following publication of revised London Plan policies.	Yes		<p>The site was assessed as part of the Tall Building Study evidence base work and was not considered appropriate for inclusion in the Millwall Inner Dock Tall Building Zone.</p> <p>The supporting text to policy D.DH7 makes a number of references to the density matrix contained in the current London Plan. For clarity, and to allow for possible changes to the London Plan, amendments are proposed to the following paragraphs:</p> <p>Paragraph 3.77: In order to manage this, the policy requires that developments in excess of the London Plan density guidelines should consider the cumulative effects from development...</p> <p>Paragraph 3.79: Where the London Plan density ranges-guidelines are exceeded, schemes must be of exemplary design quality and must address the issues cumulative impacts that can be associated with high density development, such as noise, disturbance, highways implications, loss of outlook and overlooking. In addition, developers should consider the capacity of infrastructure and services to accommodate the development including potential mitigation measures to provide additional capacity and unlock any identified constraints.</p> <p>Paragraph 3.80: Developers are expected to include reference in their planning application the relevant London Plan density range guidance for their site and the actual net residential density proposed.</p>

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1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP190	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Justified; Effective			To make Policy D.H6 Sound, • Part 3 of the wording of the policy should be amended to:"3. Development of tall buildings proposed outside of these zones must: a. DELETE <significantly strengthen> INSERT <enhance> the legibility of a town centre or mark the location of transport interchange or other location of civic or visual significance within the area; b. DELETE <provide sufficient distance> INSERT <be separate> from other landmark buildings or clusters to create a landmark in the townscape; c. unlock DELETE <significant> infrastructure constraints; and/or d. deliver DELETE <significant> additional publicly accessible open space."			Significantly strengthen' the legibility of a town centre or marking a location of significance in the area is an important principle for tall buildings proposed outside the tall building zones and will be retained. The principle of 'sufficient distance' between tall buildings is important to prevent the merging of clusters. Agree with change to policy D.DH6 (part 3: c): ..unlock significant infrastructure constraints.; and/or d. deliver significant additional publicly accessible open space. Paragraph 3.74 will be amended to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c: In such locations, tall buildings will be expected to serve as landmarks and unlock significant strategic infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities, new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area) to address existing deficiencies within the area and future needs (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies)
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP319	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Consistent with national policy			This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings. The Proposals Map identifies the locations of Tall Building Zones which are denoted by a red dotted line. The clear delineation of these zones is not supported by our client as they are contrary to the design aspirations for tall buildings which is set out in the draft Local Plan. The current zones do not allow for a transitional build-up of heights to the tallest cluster point. We suggest that the annotation is reconsidered and the use of a colour which fades from the centre of the tall building zone outwards is used. This demarcation will allow the tallest buildings to be located within the identified cluster and surrounding buildings to incrementally increase in height to the cluster. This is aligned with the cluster one principle in figure 9 of the draft Local Plan. The Bishopsgate Goodsyrd redevelopment site should be identified as a tall building zone given the strategic importance of the site for the Council and for London in meeting their residential and commercial targets which is only			Such shading is not considered to assist with understanding how tall building zones are to be implemented (see guidance in paragraph 3.72). This area was assessed as part of the Tall Buildings Study as was not considered suitable as a tall building zone due to heritage sensitivities, impact on LVMF views and cumulative effects As part 3 of the policy refers to all parts of the borough outside the tall building zones, this is not considered to be necessary. Insert additional text at the end of paragraph: This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant

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									possible by way of high density development.			policies.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP324	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	Yes		It is noted and encouraged that Section 3 confirms that development of tall buildings outside of the designated Tall Building Zones are not precluded provided they meet the requirements to: strengthen the legibility of a town centre or mark the location of significant within the area; provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape; unlock significant infrastructure constraints; and/or deliver significant additional publicly accessible open space.					Comment is noted.

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1054236	EID Partners hip		LP308	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A		It is essential when considering the future of the Blackwall cluster on London's skyline to consider the relationship moving forward with the neighbouring Canary Wharf cluster. We broadly support policy D.DH6 (Tall buildings) but seek clarification with regards to the wording of paragraphs 1a, 1c,1e and 1i. London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume that have regard to are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and in keeping to the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: c. enhance the character and distinctiveness of an area without materially adversely affecting affected established valued townscapes and landscapes (including building/rooflines) or materially detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings except where any harm is				Meeting the criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. A minor modification to be made to D.DH6 part 1 to clarify this: 1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must:

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								<p>outweighed by the benefits brought forward; Plans for new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part i of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which where appropriate to the typology of building local residents can use and that encourage social cohesion.</p>				

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1054236	EID Partners hip		LP338	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			Blackwall Cluster Further, at Regulation 18 stage, we noted that there are a series of policies in the emerging plan that provide guidance on height and density and that it was clear from the redevelopment of adjacent sites such as New Providence Wharf, Blackwall Reach and Trafalgar Way, that a sub-cluster of taller buildings has emerged around Blackwall. We consider that the East India Dock Estate is very much part of this context of large scale higher density urban buildings and where opportunities exist to intensify and optimise the development potential of the site through replacement rather than refurbishment of existing buildings, it is our view that taller buildings are an appropriate response to context and would provide additional legibility with reference to poplar high street and the extension of the high street outlined above. We therefore support the Councils designation of a new Tall Buildings Zone the "Blackwall Cluster" and consider that this is designation is crucial to achieving the necessary growth across Blackwall and the wider area. The draft report of the Tower Hamlets Tall Building Study identifies outline consent for nine tall buildings at Blackwall Reach, up to 37 storeys in height. The inclusion of this cluster in policy is therefore consistent within the development context and reflects the schemes being brought forward in the area. In addition, we note that Policy D.DH7 advises that residential development should be consistent with the guidelines set out in the London Plan. We support this wording and reiterate that density on their own should not determine the acceptability of a proposal as each site and development should be assessed on its detailed and technical design.				Support for the policy is welcomed.
1054350	Frasers (Central House) Ltd		LP363	PART 3: POLICIES, 3.59 Paragraph Policy	No	Positively prepared; Justified			Policy D.DH6 notes that 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' and that tall building proposals will be subject to additional criteria to ensure they do not have an	Yes		Central House was not included in the Aldgate tall building zone due to heritage sensitivities in relation to the site and the surrounding area.

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				D.DH6: Tall buildings		ed; Effective			adverse impact on the setting or character of the Borough. We note that Section 6 of the LBTH Tall Buildings Report (Sept 2017) is dedicated to providing an assessment of the relevant areas to confirm the extent of the designation of the tall building zones. However, it is evident that the areas covered by these clusters have been altered between a) the July 2017 version of the report, published on the Council's website, and b) the version published in September to accompany the Draft Local Plan. Both the Aldgate Cluster and Millwall Inner dock cluster have been altered in scale, yet there has been no alteration to Section 6 of the report to justify why this change has been made. It is not clear why the clear and consistent evidence base prepared by the appointed consultants would be changed without further acknowledgement or revised justification. Of particular importance to our client is the Aldgate cluster, which has been reduced in size and hereby limiting the potential for high density development that is otherwise encouraged in the CAZ. In light of the projected 125,000 job increase in LBTH, it is essential that LBTH encourages such high density development to provide sufficient floorspace to cater for this stated increase in demand for office space and to meet the requirements of para 20 and 21 of the NPPF. Arguably the Aldgate cluster has a broader central area – rather than a single high point – which is located along the High Street, including the key junctions of both Commercial Street and Commercial Road and all of the entrances to the Underground station. This is partly because of the townscape significance of all of those points and the fact that the cluster is never read on the skyline with the rounded profile shown and advocated on page 205 of the study. Central House, as was previously designated but subsequently removed, should form a key part of this Aldgate cluster, for a number of key reasons: • It is centrally located, • It is adjacent to convergence of Commercial Road and Whitechapel Road; • It sits within a high street location • It is adjacent to an Underground Station entrance • It is within the CAZ Building Heights – Policy D.DH6 is not justified as the evidence base fails to demonstrate why Central House was removed from the proposed tall buildings cluster. It also fails to be consistent with the NPPF by failing to plan positively for economic growth in accordance with paras 20 and 21. In response to the above we would propose: 3 The Tall Building Zone within the Aldgate Area to include Central House, as previously concluded within the consultants' Tall Building Study (July 2017).			
1143348	Healey Development Solutions	Healey Development Solutions	LP841	PART 3: POLICIES, 3.59 Paragraph	N/A			The site sits within the Isle of Dogs Activity Area boundary and as set out in current policy DM26, supports the second highest form of development				The tall buildings policy aims to strike a balance between protecting views and the skyline of strategic importance and allowing greater heights to come forward in defined

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		(Millharbour) Ltd		Policy D.DH6: Tall buildings				<p>in the borough and is the next most preferable location for tall buildings after the Aldgate and Canary Wharf POL's. Proposed Policy D.DH6 directs the development of tall buildings towards designated Tall Building Zones. The site is located within Tall Building Zone: Millwall Inner Dock (Isle of Dogs) where tall buildings are considered acceptable in principle. This consistent approach is welcomed and considered in line with both national and regional planning policy. With particular reference to the Millwall Inner Dock cluster Policy D.DH6 states: • Building heights in the Millwall Inner Dock cluster should drop away from the Canary Wharf cluster to support its central emphasis. • Building heights should step down away from the centre of the cluster and ensure that the integrity of the Canary Wharf cluster is retained on the skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in the London Views Management Framework. It is acknowledged it has been a longstanding position of both the GLA and LBTH that the height of buildings should step down away from 1 Canada Square, particularly in views identified in the London Views Management Framework. It is on this basis that the development proposals for the site respect the requirement for 'stepping down' that is appreciated within views that take into account of the wider context of the site. Policy D.DH6 requires for developments involving tall buildings to step down towards the edge of the tall building zone (as shown by figure 9). While comprehensive redevelopment is promoted through the site allocations within both the adopted and emerging Local Plan, it is considered that this policy should be reviewed and amended so that it may take into account the way development sites come forward to explicitly provide for optimisation of development opportunities within such Opportunity Areas.</p>				<p>areas with good access to public transport. The principles proposed for this tall building zone will enable officers to carefully manage development to the south of the Canary Wharf cluster. No change is considered necessary.</p>

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1143348	Healey Development Solutions	Healey Development Solutions (Millharbour) Ltd	LP845	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			Proposed Policy D.DH4 seeks to introduce local views, landmarks and the skyline of strategic importance (the Core of the Canary Wharf Estate). The proposed designations are in addition to considerations relating to the setting of heritage assets and how development might appear in the backdrop of London View Management Framework views. It is understood that the Canary Wharf Cluster and the Millwall Inner Dock Cluster form the 'skyline of strategic importance'. Part (b) of Policy D.DH4 requires that development demonstrates how it positively contributes to the skyline of strategic importance, forming the silhouettes of tall building clusters around Canary Wharf. In doing so, building heights are expected to significantly drop towards the boundary and the heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area. We do not consider that the use of 'significantly lower' facilitates the Borough in achieving objectives of national or local requirements in relation to meeting housing and employment needs. Further, it is considered this is in conflict with the Isle of Dogs and Poplar Opportunity Area and the objectives of delivery within opportunity areas as set out within the London Plan. In light of this, we consider this part of the Policy should be reviewed and amended in order to be consistent with policies that support growth in the Plan.				The tall buildings policy aims to strike a balance between protecting views and the skyline of strategic importance and allowing greater heights to come forward in defined areas with good access to public transport. The principles proposed for this tall building zone will enable officers to carefully manage development to the south of the Canary Wharf cluster. No change is considered necessary.

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624580	Jason Larkin	Canary Wharf Group Plc	LP509	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Justified; Effective		Tall Building Zones (TBZ) have now been identified (Figure 8) and Canary Wharf is correctly identified as a TBZ. Our suggested 'green/amber/red' approach as set out on the Regulation 18 consultation has not been taken up, but the new policy does acknowledge that tall buildings may be possible outside the identified zones. The following comments are made on the new wording. Section 1 of the draft policy The requirement in part 1. a. that tall buildings are "in keeping with the character of the immediate context and of their surroundings" takes no account of site specific conditions, and could have the effect that no large scale redevelopment would ever take place at the boundaries of tall building zones and in currently low scale regeneration areas. Given that the purpose of this policy is to guide the development of tall buildings within the borough (and it accepted that subject to certain criteria that tall buildings could come forward both within and outside the TBZs), the policy is not positively prepared or effective if the tall building has to be of a height, scale and mass that is in keeping with its surroundings. This part of 1.a. should therefore be deleted. It is not clear what having "materials integrated at all angles of the building" means in part 1.b. Part 1.c. refers to 'other historic skylines' but it is not clear what is meant. This term is not defined anywhere or used in the Conservation Strategy 2017. Neither of these requirements seem justified and therefore should be deleted from the policy wording. Section 2 of the draft policy The principles for the Canary Wharf (Isle of Dogs) TBZ also include that "Building heights within the Canary Wharf cluster should drop away from the central location at One Canada Square." There is also reference in para. 3.45 (which is supports policy D.DH4) to building heights within the Canary Wharf TBZ dropping significantly towards its boundaries. As set out in our Regulation 18 consultation response, this approach is too prescriptive, subjective and simplistic and sets further unnecessary criteria for what is already defined as a TBZ. The pattern of development being promoted is only one way that a tall buildings cluster could develop, it does not take account of how clusters such as that on the Isle of Dogs, and indeed almost all other tall building areas across the world, have developed in practice; and this wording makes no allowance for site specific conditions. As set out in our Regulation 18 consultation response, this approach is too prescriptive, subjective and simplistic and sets further unnecessary criteria for what is already defined as a TBZ. The pattern of development being promoted is only one way that a tall buildings cluster could develop, it does not take account of how clusters such as that on the Isle of Dogs, and indeed almost all other tall building areas across the world,	Yes		<p>The wording of policy D.DH6 (part 1) contains a number of established principles to ensure that the design of new tall buildings achieve exemplary standards, as required by the London Plan.</p> <p>For clarity, we will amend policy D.DH6 (part 1a):</p> <p>and in keeping with take account of the character of the immediate context and of their surroundings; and 1b b. achieve exceptional architectural quality and using robust and durable materials integrated at all angles of throughout the building. No change to part 1c.</p> <p>The tall building study considered how Canary Wharf cluster has developed, taking into account consented and unbuilt schemes. The principles for this tall building zone have been based on this analysis. Further information regarding the identification of the skyline of strategic importance is provided in the Views and Landmarks Topic Paper (SED15) submitted to support the examination.</p> <p>Glossary insert: Urban super block: An urban block created by one large building surrounded by streets.</p> <p>Blank facades can be a particular issue in developments of tall buildings due to the need to accommodate access to servicing etc within a limited footprint.</p> <p>Amend figure 9:</p> <p>CLUSTER PRINCIPLE TWO: Tall buildings outside but within the vicinity of the cluster are not desirable</p> <p>CLUSTER PRINCIPLE FOUR: Tall buildings in the foreground of the clusters should not break the silhouette of this cluster when seen from the southern bank of the Thames riverfront.</p>

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									<p>have developed in practice; and this wording makes no allowance for site specific conditions. It is instructive to compare the theory set out in the policy with the reality of how the Isle of Dogs tall buildings cluster has already developed, and is set to develop further through consented and under-construction schemes. While One Canada Square is and will remain the tallest building on the Isle of Dogs, there are a number of under-construction and consented schemes - the Newfoundland, Hertsmere House, extant North Quay and Riverside South schemes, for example - that will be lower than One Canada Square but will not step down from it to the degree shown in Figure 9. Nor is it obvious why they should - there is a strong case that those buildings located against the open space of the River Thames or at the ends of docks, for example, should be taller than those buildings located in more ordinary locations closer to the centre of the cluster. While this results in a different pattern to that shown in Figure 9, it is highly subjective to say that one is preferable to the other. In practice, the general pattern that has emerged within the wider Isle of Dogs cluster over the last few decades is for there to be a central cluster of tall commercial buildings around One Canada Square; tall residential buildings such as Newfoundland and Hertsmere House on the periphery of this central cluster; and then a general stepping down beyond Canary Wharf, largely comprising residential tall buildings with a generally slimmer and more articulated form than the central tall buildings (at about 2/3 of the height of the central buildings). It is important to note that this stepping down beyond Canary Wharf is general and modulated, and not strictly linear and progressive from one site to the next. There is not enough recognition in the policy or Figure 9 that a particular site and development may need to respond to several different townscape conditions. It is also not helpful to concentrate on shaping heights to the exclusion of other ways in which areas of development within a cluster can be differentiated (e.g. through form and detailed architecture). It is also important to reiterate that Canary Wharf is located within a London Plan Opportunity Area (Isle of Dogs and South Poplar) and the Central Activities Zone (CAZ) for office policy purposes. Canary Wharf is also a Major town centre which is moving towards Metropolitan status and has excellent transport links. The London Plan (Policy 7.7) directs tall buildings to such locations and identifies that in Opportunity Areas (Policy 2.13) residential and non-residential outputs and densities should be optimised. Indeed there are numerous references within the Draft Local Plan to focussing growth at Canary wharf. For example, on Figure 2: 'Position of</p>			

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									Tower Hamlets within the context of London and neighbouring areas' Canary Wharf is shown as the Borough's "Key Growth Area" and as described above, draft policy S.SG1: 'Areas of growth and opportunity within Tower Hamlets' states that the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area, principally within Canary Wharf and north of the Isle of Dogs. As such, Canary Wharf is just the type of location where tall buildings and dense development should be focused and by placing unnecessary restrictions on building heights in this area will compromise the Borough's ability to meet its growth. For these reasons the policy is not positively prepared, justified or effective and therefore unsound and we recommend that this policy should be re-written, informed by a study of how Canary Wharf and the wider Isle of Dogs cluster have developed in reality (including committed but as yet unbuilt developments). We are doubtful that attempting to shape the general pattern of development is desirable, but in any case the revised policy should not be highly prescriptive and should allow room for the characteristics of particular sites to be taken into account. We also seek clarification as to what an "urban super block" comprises, as not all sites within Canary Wharf form part of a block.			
719346	John Turner	Ballymore Group	LP271	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Policy D.DH6 – Tall Buildings Ballymore continues to support the Council on their approach to tall buildings which seeks to promote tall and high density development within designated tall buildings zones. That said we are surprised that the Council has not sought to designate the City Fringe within table 2 as an area specifically capable of supporting tall buildings. One of the key goals for the city fringe as defined by its Opportunity Area Framework is that it is capable of supporting Dense, urban, collaborative environments. This area contains 4 of Councils key development sites (Bishopsgate Goods Yard, London Dock, Marian Place Gas Works and the Oval and Whitechapel South) (Separate representations on Bishopsgate Good Yard have been submitted to the Council on behalf of Goods Yard Regeneration Limited a 50/50 joint venture between Hammerson plc and Ballymore). It is an Opportunity Area and an important delivery vehicle for new housing and jobs. Whilst it is acknowledged that any tall development must be designed in accordance with the surrounding view management framework and protected vistas there is substantial opportunity for high density, sustainable developments which contribute to both new jobs and homes within the area. Failing to identify the City Fringe within table 2 could jeopardise the delivery of some of these benefits. In addition we are pleased to see that part 3 of the policy has been amended to	Yes		It is not considered appropriate to designate the whole of the City Fringe opportunity area as a tall building zone due to its large size and significant heritage sensitivities. Such shading is not considered to assist with understanding how tall building zones are to be implemented (see guidance in paragraph 3.72).

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									acknowledge that tall buildings outside of designated areas can play a crucial part in the regeneration of the Borough as long as they meet a series of appropriate criteria. This approach is strongly supported by recent Mayoral Directions which have sought to deliver taller and denser developments at key transport interchanges throughout London. Finally it is important within policy 1) a) for the Council to recognise that the under development of existing areas should not be a barrier to appropriate development coming forward. The step down approach outlined in policy could potentially require any new development to acknowledge the height of existing buildings purely by virtue of their location and not consider whether the existing building is appropriately developed for its own location. The presence of low density underdeveloped land surrounding regeneration areas could drastically impede on the ability for the Council to deliver the much needed housing. The scale of this issue within London is best demonstrated by a recent report by London First (Redefining Density 2015). This report stated that should the correct density be applied to all of Central London then over a 10 year period an additional 373,000 new homes could be delivered. The Council has been allocated ambitious targets for the forthcoming period to deliver new homes and new jobs. The approach to allow floorspace to be released to other more dense uses must therefore not be overlooked. Ensuring the right sites come forward at sustainable densities is paramount to delivery of new homes in a sustainable manner. This is a key part of the Councils objectives for the area which seeks balanced growth alongside adequate infrastructure. Finally we would recommend that the proposals map is amended to provide more clarity on tall buildings zones. The current zones do not allow for a transitional build-up of heights to the tallest cluster point. We suggest that the annotation is reconsidered and the use of a colour which fades from the centre of the tall building zone outwards is used to enable developers to understand the Councils the restraints of the tall building zones from the outset.			
1131148	LB Hackney	LB Hackney	LP581	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			Tower Hamlets' Tall Buildings Study 2017 identifies zones where tall buildings are considered to be appropriate and these are set out in Policy D.DH6 Tall Buildings. The Regulation 18 Local Plan identified the City Fringe CAZ as a location appropriate for Tall Buildings, but the Regulation 19 Local Plan narrows this area down to specifically focus tall buildings within a cluster around Aldgate, which is some way away			Comments are noted.	

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								from the Hackney / Tower Hamlets border. Hackney is currently finalising its own Characterisation Study which will take a slightly different approach insofar as we are unlikely to specify locations considered to be appropriate for tall buildings, but the Characterisation Study will inform areas where densification and growth may be appropriate across the borough. We look forward to continuing to work closely with Tower Hamlets on this topic. I hope the above comments are helpful. We look forward to discussing these issues at our Duty to Cooperate meeting on 21 November and continuing to engage on a constructive and ongoing basis as Tower Hamlets' Local Plan is finalised and adopted and Hackney's Local Plan and 'Future Shoreditch' AAP both continue to progress towards adoption.				
1054252	Londone wcastle	Londone wcastle	LP619	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified			This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings. The Proposals Map identifies the locations of Tall Building Zones which are denoted by a red dotted line. The delineation of these zones is not supported by our client as they are contrary to the design aspirations for tall buildings which is set out in the draft Local Plan. The current zones do not allow for a transitional build-up of heights to the tallest cluster point. We suggest that the annotation is reconsidered and the use of a colour which fades from the centre of the Tall Building Zone outwards is used. This demarcation will allow the tallest buildings to be located within the identified cluster and surrounding buildings to incrementally increase in height to the cluster. This is aligned with the cluster one principle in figure 9 of the draft Local Plan. Supporting text paragraph 3.73 notes that the Tall Building Study identifies other potentially suitable locations outside of the Tall Building Zones where tall buildings might be appropriate, depending on the nature of the proposals and where sensitive receptors have been addressed. These areas should be denoted on the revised Proposals Map and clearly identified within Section 3 of the Policy. Such other areas should include strategic sites (Whitechapel South) and Masterplan areas (Whitechapel Vision Masterplan) that require the delivery of additional housing / commercial floorspace by way of high density development. Currently the Whitechapel area is not identified as a Tall Building Zone. The adopted			Such shading is not considered to assist with understanding how tall building zones are to be implemented (see guidance in paragraph 3.72). Whitechapel has not been identified as a tall building zone, primarily due to heritage sensitivities, which are further detailed in the Tall Building Study.

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								Whitechapel Vision Masterplan identifies the need to deliver 3,500 additional residential units by 2025 and 5,000 new jobs. The document notes that this is predicated on high density development which can include landmark tall buildings. We request that the policy and Proposal Map aligns with the Whitechapel Vision Masterplan and include reference to tall buildings being appropriate within the identified key strategic sites including site allocation 15 (the Whitechapel Estate). It is noted and encouraged that Section 3 confirms that development of tall buildings outside of the designated Tall Building Zones are not precluded. As a result, we do not believe the draft plan to be justified.			
1142716	Lyca Group		LP691	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A		We offer comments below in relation to draft policies in relation to building heights, design and views. Building Heights Policy D.DH6: Tall Buildings We broadly support policy D.DH6 (Tall buildings) but seek clarification with regards to the wording of paragraphs 1a, 1c,1e and 1i. London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume that INSERT <have regard to> DELETE <are proportionate to their role, function and importance of the location in > the local, borough-wide and London context; and DELETE <in keeping to > the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers			Meeting the criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. For clarity the following amendments to policy D.DH6 (part 1) are proposed: 1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must: Part 1a: and in keeping with take account of the character of the immediate context and of their surroundings; The principles for the Canary Wharf cluster were developed as part of the Tall Building Study evidence base. Stepping down from One Canada Square is an important established principle within the Canary Wharf tall building cluster in order to manage the iconic image of the skyline of strategic importance. Further information regarding this designation is in the Views and Landmarks Topic Paper (SED15) submitted to support the examination. Glossary insert: Urban super block: An urban block created by one large building surrounded by streets. Figure 9 is considered to give a useful illustration of the cluster principles in the Tall Building Study.	

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								<p>the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: c. enhance the character and distinctiveness of an area without INSERT<materially> adversely INSERT<affecting> DELETE< affected> established valued townscapes and landscapes (including building/rooflines) or INSERT<materially> detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings INSERT< except where any harm is outweighed by the benefits brought forward;> Plans for new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part i of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which INSERT<where appropriate to the typology of building> local residents can use and that encourage social cohesion We fully support the designation of the Canary Wharf cluster as a tall building zone, as stated in Policy D.DH6 (Tall buildings).</p>				

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								<p>The text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones currently states: · Development within this location will be expected to safeguard the skyline and preserve the iconic image and character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. · Individual buildings should be integrated into urban super blocks set in the public realm. · Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. However, the draft report of the Tower Hamlets Tall Building Study identifies several key consented developments within the neighbouring Canary Wharf cluster which exceed or are similar height to the 235 m AOD height set by 1 Canada Square. These include Landmark Pinnacle (formerly known as City Pride) at 239 m AOD, Spire London (formerly Hertsmere House) at 240.5 m AOD and the existing consent referenced previously for the Riverside South scheme which totalled 241 m AOD at its tallest point. Other schemes often appear taller than 1 Canada Square in the context of perspective and, in our view, the iconic roof form of 1 Canada Square is sufficient to mark it out without it needing to be the tallest building in the vicinity. With these significant landmark schemes coming forward and shaping the borough's skyline, the requirement for building heights to step away from the central location of 1 Canada Square as stated on page 50 of the draft emerging Local Plan as part of policy D.DH6 appears both outdated and ineffectual. Indeed, the growth of these new skyscrapers will be seen to further expand the cluster of Canary Wharf as a whole, enhancing the already distinct iconic skyline and</p>				

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								making best and most efficient use of these sites. We therefore propose that the text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones should be amended to read the following: · Development within this location will be expected to safeguard the skyline and preserve the iconic image and INSERT<dynamic> character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should delete <drop away from the central location at 1 Canada Square > INSERT <be in keeping with the character of the immediate context of their surroundings, and should enhance and provide a positive contribution to the Canary Wharf skyline. · DELETE<Individual buildings should be integrated into urban super blocks set in the public realm. · Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. > We suggest that the term 'urban super block' is clearly defined, and suggest that this should not be the only urban form noted as appropriate. The changes proposed above are supportive with section 1 of Policy D.DH6 and therefore offer consistency when considering tall building proposals against emerging policy. We request the deletion of figure 9 (Principles of tall building clusters) as it oversimplifies the concept of tall building clusters which will typically be appreciated in three, not two, dimensions.				
1105881	Michael Atkins	Port of London Authority	LP316	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				9. Policy D.DH6: Tall buildings (page 51) The PLA notes that part 1 of the policy requires tall buildings to comply with civil aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks. Blackall Radar is a PLA owned radar station located at Northumberland Wharf. It will also be important that any tall buildings do not interfere with the operation of the PLAs river radar equipment and the PLA request for this policy to include reference to			Insert into policy D.DH6 (part I): ...television and radio transmission networks and river radar equipment.

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									this facility.			
1141834	Peter Marsden		LP638	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			The issue of tall buildings development in the wider setting of WHS has been of great concern in recent years because of the threat to strategic views to and from the WHS, in particular from the General Wolfe statue in Greenwich Park. The advance of development west of the Canary Wharf cluster and around Sir Christopher Wren's historic Grand Axis has the potential to undermine the significance of the Grand Axis as a key attribute of the Outstanding Universal Value of Maritime Greenwich, impair views to and from the WHS and destroy the visual integrity of London's skyline forever. We are therefore encouraged that Policy S.DH5 takes account of the heritage implications regarding the WHS and seeks to ensure that evolving tall buildings clusters do not have a harmful effect or negative impact on views and vista to and from the WHS. We believe that developers need to ensure that planning applications fully address the issue of visual layering and materiality and a stepping down in height and scale of development towards the WHS, ideally ensuring gaps and undulations in the skyline to avoid the unsightly appearance of 'table topping'. We would also encourage Tower Hamlets to take in the impact of building colour in development proposals. In recent months at least two buildings have been completed in bright red and yellow colours with a marked impact on the overall effect of the skyline when viewed from Greenwich Park. It would also be helpful if the policy defined the Grand Axis for the benefit of developers. Explanation The				Insert at end of paragraph 3.47: New developments are expected to make a positive contribution to the skyline, including in their use of palette and texture, in particular where these buildings will have an impact on long-distance views.

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								potential impact of tall development on World Heritage Sites should be strengthened in the explanatory text. We recommend that para. 3.60 (page 51) should be amended to read: Whilst tall buildings can positively contribute to the local environment and help to deliver growth in the local economy or much needed new homes, they can also cause harm to the character and identity of an area, either individually or cumulatively INSERT <, and on views and vistas to and from Maritime Greenwich and Tower of London World Heritage Sites with a potential to impact negatively on their outstanding universal value.>				
1143389	Sainsbury's Supermarket Limited		LP907	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Justified; Effective			Policy D.DH6: Tall Buildings The policy seeks to guide and manage the development of tall buildings within the borough and requires applicants to demonstrate compliance with several criteria. There is no supporting text for the criteria which would justify the rationale for each test. We believe the wording of some criteria to be unsound. The restrictive approach has not been tested in the evidence base and would cut across other aspects of the Plan and the London Plan in relation to achieving optimum densities. They are therefore neither justified nor effective: c) Development is required to enhance the character of an area without adversely affecting established 'valued' townscapes. There is no indication of what constitutes a valued townscape. It is recommended therefore that the criterion provides a more precise wording by stipulating 'designated' townscapes. This criterion is also inconsistent with the balanced approach to design and visual impact in NPPF paragraphs 64 and 65, for the purposes of NPPF paragraph 182. e) Development is required to 'not prejudice' future development potential of adjacent/neighbouring buildings. Again, there is no supporting justification to determine compliance with this criterion given that the interpretation of 'prejudice' is varied and open. j) Development is required to demonstrate that there will be no adverse impact on the microclimate and the amenity of the proposal site and surrounding area. The wording of the criterion would infer that any adverse impact on the site and surrounding area would form the basis for a refusal. The wording of the policy should be reviewed accordingly. On the basis of the above, the Policy is not sound as it is not positively prepared, not justified and would not be effective in achieving local and strategic plan outcomes, nor is it consistent with the NPPF. We support the inclusion of Part 3 which			Meeting the criteria in policy D.DH6 (parts 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. For clarity, insert: 1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must:

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								provides criteria for development of tall buildings outside of designated tall building zones. This is a more positive approach in comparison to the Regulation 18 Consultation (November 2016) which restricted tall buildings to the identified Tall Building Zones only.			
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP957	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No			<p>Policy D.DH6 (Tall Buildings) We broadly support policy D.DH6 (Tall buildings) but seek clarification with regards to the wording of paragraphs 1a, 1c,1e and 1i. London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume INSERT <that have regard to> DELETE < are proportionate to their role,function and importance of the location in> the local, borough-wide and London context; and DELETE <in keeping> INSERT < to> the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: a. enhance the character and distinctiveness of an area without INSERT <materially> adversely INSERT <affecting> DELETE < affected> established valued townscapes and landscapes (including building/rooflines) or INSERT <materially> detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings INSERT <except where any harm is outweighed by the benefits brought forward;> Plans for new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site</p>		<p>This policy aims to strike a balance between support for tall buildings and taking into account impact in relation to surrounding context and therefore proposed weakening of text in part 1 of policy is not supported.</p> <p>Accept change to part 1a: ..and in keeping with take account of the character of the immediate context and of their surroundings;</p> <p>No change proposed (representor supports the identification of Blackwall tall building cluster).</p> <p>The principles for Canary Wharf cluster are derived from Tall Buildings Study and principle of dropping down heights from One Canada Square is established. The principles for the Canary Wharf tall building zone were derived through the Tall Building Study evidence base.</p> <p>Figure 9 is taken from the Tall Building Study and is considered to provide a useful guide for understanding the principles of the tall building zones.</p>	

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									<p>may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part i of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which INSERT <where appropriate to the typology of building> local residents can use and that encourage social cohesion Blackwall Cluster We fully support the designation of the Blackwall cluster as a tall building zone, as stated in Policy D.DH6 (tall buildings) and consider that this designation is crucial to achieving the necessary growth across Blackwall and the wider area. The draft report of the Tower Hamlets Tall Building Study identifies outline consent for nine tall buildings at Blackwall Reach, up to 37 storeys in height. The inclusion of this cluster in policy is therefore consistent within the development context and reflects the schemes being brought forward in the area. Canary Wharf Cluster We fully support the designation of the Canary Wharf cluster as a tall building zone, as stated in Policy D.DH6 (Tall buildings). London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume that INSERT<have regard to> DELETE < are proportionate to their role, function and importance of the location in> the local, borough-wide and London context; and DELETE<in keeping> INSERT <to> the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: c. enhance the character and distinctiveness of an area without INSERT <materially> adversely INSERT <affecting> DELETE <affected> established valued townscapes and landscapes (including</p>			

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									<p>building/rooflines) or INSERT <materially> detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings INSERT <except where any harm is outweighed by the benefits brought forward;> Plans for new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part l of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which INSERT <where appropriate to the typology of building> local residents can use and that encourage social cohesion The text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones currently states: -- Development within this location will be expected to safeguard the skyline and preserve the iconic image and character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. . - Individual buildings should be integrated into urban super blocks set in the public realm. . - Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. However, the draft report of the Tower Hamlets Tall Building Study identifies several key consented developments within the neighbouring Canary Wharf cluster which exceed or are similar height to the 235 m AOD height set by 1 Canada Square. These include Landmark Pinnacle (formerly known as City Pride) at 239 m AOD, Spire London (formerly Hertsmere House) at 240.5 m AOD and the existing consent referenced previously for the Riverside South scheme which totalled 241 m AOD at its tallest point. Other schemes often appear taller than 1 Canada Square in the context of perspective and, in our view, the iconic roof form of 1 Canada Square is sufficient to mark it out</p>			

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									without it needing to be the tallest building in the vicinity. With these significant landmark schemes coming forward and shaping the borough's skyline, the requirement for building heights to step away from the central location of 1 Canada Square as stated on page 50 of the draft emerging Local Plan as part of policy D.DH6 appears both outdated and ineffectual. Indeed, the growth of these new skyscrapers will be seen to further expand the cluster of Canary Wharf as a whole, enhancing the already distinct iconic skyline and making best and most efficient use of these sites. We therefore propose that the text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones should be amended to read the following: -- Development within this location will be expected to safeguard the skyline and preserve the iconic image and INSERT <dynamic> character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should DELETE <drop away from the central location at 1 Canada Square> be in keeping with the character of the immediate context of their surroundings, and should enhance and provide a positive contribution to the Canary Wharf skyline. ·DELETE <- Individual buildings should be integrated into urban super blocks set in the public realm.> ·DELETE <- Building heights within the Canary Wharf cluster should drop away from the central location at 1Canada Square.> We suggest that the term 'urban super block' is clearly defined, and suggest that this should not be the only urban form noted as appropriate. We request the deletion of figure 9 (Principles of tall building clusters) as it oversimplifies the concept of tall building clusters which will typically be appreciated in three, not two, dimensions.			
1053788	Steve Craddock	The Canal & River Trust	LP352	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	Yes		We welcome the need for developments of tall buildings to demonstrate that they will not adversely impact on waterbodies and waterspaces (and biodiversity). We suggest that it would be helpful to applicants to make it clear that this includes navigation, consistent with policy 7.7 of the					Support for the policy is welcomed.

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							London Plan. However, we note that this point is covered by policy D.OSW4 and, therefore, we would not suggest that this is a soundness issue.					
1143450	Thomson Reuters		LP945	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			We fully support the designation of the Blackwall cluster as a tall building zone, as stated in Policy D.DH6 (tall buildings) and consider that this is designation is crucial to achieving the necessary growth across Blackwall and the wider area. The draft report of the Tower Hamlets Tall Building Study identifies outline consent for nine tall buildings at Blackwall Reach, up to 37 storeys in height. The inclusion of this cluster in policy is therefore consistent within the development context and reflects the schemes being brought forward in the area. The Relationship between the Canary Wharf and Blackwall Clusters It is essential when considering the future of the Blackwall cluster on London's skyline to consider the relationship moving forward with the neighbouring Canary Wharf cluster. We broadly support policy D.DH6 (Tall buildings) but seek clarification with regards to the wording of paragraphs 1a, 1c,1e and 1i. London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume			The policy aims to strike a balance between support for tall buildings and taking into account the impact in relation to surrounding context and therefore proposed weakening of the text in part 1 of the policy is not supported. Accept change to part 1a: ..and in keeping with take account of the character of the immediate context and of their surroundings;	

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								<p>that INSERT <have regard to> DELETE <are proportionate to their role, function and importance of the location in> the local, borough-wide and London context; and in keeping to the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: c. enhance the character and distinctiveness of an area without INSERT <materially> adversely INSERT <affecting> DELETE <affected> established valued townscapes and landscapes (including building/rooflines) or INSERT <materially> detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings INSERT <except where any harm is outweighed by the benefits brought forward>; Plans for new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for</p>				

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								shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part i of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which INSERT <where appropriate to the typology of building> local residents can use and that encourage social cohesion				
1142559	Tim Brennan	Historic England	LP434	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			We very much welcome the inclusion of policy D.DH6 on tall buildings and its contextual approach to such development, as well as the proposed inter-relationship with policies D.DH4 on shaping and managing views and S.DH5 on world heritage sites. We note the aspiration that new development involving tall buildings should achieve 'exceptional architectural quality'. To help ensure this, we would recommend that the policy is amended to make clear that applications must be considered to be successful against bullet points a – j inclusive in order to qualify as exceptional quality. We also welcome the text in para 3.68 as a potential mechanism to address existing tall buildings as part of any redevelopment.			Support for the policy is welcomed. Meeting the criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. Amend policy D.DH6 (part 1): 1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must:	
1142559	Tim Brennan	Historic England	LP445	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings				We welcome the portfolio of policies with relevance to the historic environment, which if properly applied should ensure new development (including tall buildings) will not have an adverse impact on the Tower of London and Maritime Greenwich world heritage sites. Nevertheless, given the sensitivity of these locations, we consider that it would be helpful if this could be stressed in the explanatory text. This could be achieved by adding at the end of para 3.60 'This is particularly true of any proposals for tall buildings that may have an impact on views of the Tower of London or Maritime Greenwich world heritage sites'. Policies S.DH1 delivering high quality design, S.DH3 heritage & the historic environment and D.DH5 world heritage sites should also be added to the policy links section.			Adequately covered under policy D.DH5 which specifically relates to world heritage sites and impacts of development. No change is necessary.	

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1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP885	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified; Effective			The adopted Development Management Document, Policy DM26, sets out 9 criteria for tall buildings proposals. Whereas, draft Policy D.DH6 sets out 12 criteria for development with tall buildings. Key changes from the adopted policy include, inter alia, the requirement for exceptional architectural quality; enhancement to the character and distinctiveness of an area without adversely affecting established valued townscape and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings; maintain adequate distance between buildings; and provide high quality private and communal open space and play areas (where residential uses are proposed) which local residents can use and that encourage social cohesion. Whilst further clarification as to how the policy will be applied by officers is welcomed, we consider that the policy is overly restrictive in a way that would impose disproportionate restrictions on optimising densities in appropriate location. To be justified and effective (and capable of being found in conformity with the London Plan), the following amendments are required:"a) be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and in keeping with the character of the immediate context and of their surroundings; b) achieve exceptional architectural quality and innovative and sustainable building design, using robust and durable materials integrated at all angles of the building; c) enhance the character and distinctiveness of an area without adversely affecting established valued designated townscapes and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings; d) provide a positive contribution to the skyline during both the day and night time; e) not prejudice future development potential of adjacent/neighbouring buildings or plots; f) maintain adequate distance between buildings to ensure a high quality ground floor experience and enhanced residential environment; g) demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes; h) present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level; i) provide high quality private and communal open space and play areas (where residential uses are proposed) which local residents can use and that encourage social cohesion, where feasible; j) demonstrate that the development does			The wording of policy D.DH6 (part 1) contains a number of established principles to ensure that the design of new tall buildings achieve exemplary standards, as required by the London Plan. The tall buildings zones in the Isle of Dogs covers those areas considered most suitable for the development of clusters of tall buildings. New tall buildings are not precluded outside these areas if they comply with the criteria in policy D.DH6 (parts 1 and 3). Further guidance relating to the assessment of the impact of a proposal on microclimate and mitigation measures is provided in paragraph 3.66.

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								<p>not significantly adversely impact on the microclimate and amenity of the proposal site and the surrounding area; k) demonstrate that the development does not adversely impact on biodiversity and open spaces, including watercourses and water bodies and their hydrology; and l) comply with Civil Aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks."In relation to 1(e), further detail is required within the supporting text as to how prejudice to development of adjacent sites would be assessed. Part 1(f) requires adequate separation distances between buildings. However, there is no prescriptive minimum distance set out. Therefore, the policy should be amended to provide a minimum separation distance. London Plan Policy 7.7 states that tall buildings should be located within the Central Activity Zone, opportunity areas, and areas of intensification or town centres that have good access to public transport. Draft Policy D.DH6 Part 2 sets out a list of suitable locations for tall buildings, which are reflected on Figure 8. We note that the Isle of Dogs and Poplar Opportunity Area is not identified as suitable for tall building, either within Policy D.DH6 Part 2 or within Figure 8. Given the London Plan identifies Opportunity Areas as suitable for tall buildings and there is no evidence-based reason for this blanket restriction; we consider that Figure 8 and D.DH6 Part 2 should be updated to reflect this in order to be justified, effective in meeting Opportunity Area needs and opportunities and be capable of being found to conform to the London Plan. In addition, Part 1 (j) of Policy D.DH6 requires clarification of the benchmark regarding what is considered to be a significant adverse impact. We note that it is standard practice for the Lawson Criteria to be used in the assessment of impact on microclimate and would welcome the inclusion of reference to this. The impact on amenity needs qualifying to refer to what the requirements are for amenity of the proposed site and the surrounding area.</p>			

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP920	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A			<p>The objectives of this policy are generally supported. This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings. We support the identification of the Westferry Printworks Site as part of a Tall Building Zone in Figure 8 of the Local Plan. Within Tall Building Zones, clusters of tall buildings may be developed. This positively prepared policy is supported in principle. However Part G) of this policy states that developments are required to demonstrate that they do not adversely impact on the microclimate and amenity of the proposal site and the surrounding area. The development of tall buildings will inevitably lead to impacts on microclimatic conditions and it is important for policy to take account of this. For the policy to be effective and deliverable it is suggested that Part G) of the policy should be amended as follows: "Development with tall buildings are required to: demonstrate that the development either does not adversely impact on or can suitably mitigate against any impacts on the microclimate and amenity of the proposal site and the surrounding area". The policy should also acknowledge that there are many competing factors when considering the acceptability of proposed building heights and developments can be capable of delivering significant public benefits which can justify additional height subject to detailed design and impact on townscape and heritage. In addition, the design principles within this policy for the Millwall Inner Dock (Isle of Dogs) Tall Building Zone, reproduced below, seek to protect the Canary Wharf cluster as the pinnacle of tall buildings. Whilst it is accepted that there is a cluster of tall buildings at Canary Wharf there is no strategic townscape rationale which would seek to retain the height of the cluster as the central emphasis on the island. Indeed, planning permission</p>			<p>The impact on microclimate is an important consideration to ensure that new tall buildings have an acceptable impact on the site and surrounding area. Further guidance on the assessment of microclimate is contained in paragraph 3.66.</p> <p>Design principles for Millwall Inner Dock are important for the preservation of skyline of strategic importance and LVMF views.</p> <p>Amend Millwall Inner Dock (Isle of Dogs) principles for clarity:</p> <p>Building heights should step down away from the centre of the cluster. Proposals must ensure that the integrity of the Canary Wharf cluster is retained on the skyline....</p>	

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								has been granted for a number of schemes that would conflict with this policy aspiration. The following design principle should therefore be deleted:"Building heights in the Millwall Inner Dock cluster should drop away from the Canary Wharf cluster to support its central emphasis. Building heights should step down away from the centre of the cluster and ensure that the integrity of the Canary Wharf cluster is retained on the skyline when seen.from places and bridges along the River Thames across Greater London, particularly in views identified in the London Views Management Framework. "				
1053510	Zeloof LLP and Truman Estates Limit		LP707	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				1. Draft Policy D. DH 6 'Tall buildings' 1.1. The draft policy introduces Tall Building Zones (TBZ). Importantly, TBZ's should include London's designated Opportunity Areas to ensure the strategic objectives of the City Fringe Opportunity Area Planning Framework including the delivery of new commercial floorspace can be achieved. We note in the adopted City Fringe Opportunity Area Planning Framework document, the sub-area 'Spitalfields' is identified as an appropriate location for tall buildings. Within the draft policy only the Aldgate area in the western part of the borough is designated as an appropriate location for tall buildings. The TBZs in the Draft Local Plan should however be consistent with this planning guidance to ensure parity with wider London objectives. 1.2. In addition, we note that the definition of 'tall building' refers to any building significantly taller than its surroundings or a building which is twice the height of surrounding buildings. This could be misconstrued and does not provide a sound definition upon which to base a planning policy. DP3370/JWP/HPM 13 November 2017 Local Plan Consultation D&R Strategic Planning London Borough of Tower Hamlets PO BOX 55739 London E14 1BY VIA EMAIL 1.3. There are numerous examples whereby buildings sit comfortably at different heights alongside each other. To apply planning policy considerations concerning tall buildings in a scenario where there is a juxtaposition of building heights is inappropriate. A more robust definition of a tall building should be included accordingly. 1.4. Paragraph 3.68 states that 'The presence of an existing tall building on the site will not in itself be regarded as justification for replacing it with another tall building or the commencement of a tall building cluster or zone'. Inclusion of such wording ignores the need to assess the established context of a site. Existing tall buildings demonstrate an existing	Yes		Tall buildings zones are considered to be the most appropriate parts of the borough for tall buildings and these are generally located in the opportunity areas. It was not appropriate to designate all of the opportunity areas as tall building zones due to their large size, and significant parts of the opportunity areas have limited connectivity and heritage sensitivities. The definition of tall buildings as those two times the height of the surrounding context is a clearer definition than the existing 'significantly higher' in the Core Strategy. The glossary definition will be modified to reflect this: Tall buildings: Any building that is significantly taller than their surroundings its local context and/or have has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building. Tall buildings are generally not considered to be appropriate in conservation areas, as further explained through the Conservation Area Character Appraisals and Management Guidelines.

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								condition and should therefore be considered when determining the acceptability of proposals. 1.5. Paragraph 3.73 states that 'tall buildings will generally not be supported in sensitive locations (e.g. conservation areas) and established low rise residential areas'. Proposals for tall buildings should be assessed by their own merits on a case by case basis. It would be inappropriate to rule out tall buildings in areas such as conservation areas whereby it can be demonstrated that proposals comply with other design policies. There are a number of modern and historic examples in Central London whereby tall buildings sit comfortably within the context of a conservation area. It is essential for areas to accommodate growth not to rule out the potential for large development. Note: no soundness test was undertaken.			
1142691		Alliance Property Asia	LP603	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No			POLICY D.DH6: TALL BUILDINGS This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings. The Proposals Map identifies the locations of Tall Building Zones which are denoted by a red dotted line. The clear delineation of these zones is not supported by our client as they are contrary to the design aspirations for tall buildings which is set out in the draft Local Plan. The current zones do not allow for a transitional build-up of heights to the tallest cluster point. We suggest that the annotation is reconsidered and the use of a colour which fades from the centre of the Tall Building Zone outwards is used. This demarcation will allow the tallest buildings to be located within the identified cluster and surrounding buildings to incrementally increase in height to the cluster. This is aligned with the cluster one principle in figure 9 of the draft Local Plan. Supporting text paragraph 3.73 notes that the Tall Building Study identifies other potentially suitable locations outside of the Tall Building Zones where tall buildings might be appropriate, depending on the nature of the proposals and where sensitive receptors have been addressed. These areas should be denoted on the revised Proposal Map and clearly identified within Section 3 of the Policy. Such other areas should include strategic sites and Masterplan areas that require the delivery of additional housing / commercial floorspace by way of high density development. It is acknowledged that the 2-6 Commercial Street and 98-105 Whitechapel High Street site, located directly opposite Aldgate tube station, is not included within the current Tall Building Zone. It is unclear why this site has been excluded given its highly accessible location, partly cleared status as a car park and prominent location within the City Fringe Opportunity Area. This site provides a unique opportunity to deliver a significant quantum of commercial development which is a key corner site in	Yes	<p>Policy D.DH6 part 1 contains a number of established principles to ensure that the design of new tall buildings achieve exemplary standards, as required by the London Plan. Amendments are proposed as follows:</p> <p>Part 1a: and in keeping with take account of the character of the immediate context and of their surroundings;</p> <p>Part 1b: achieve exceptional architectural quality and using robust and durable materials integrated at all angles of throughout the building.</p> <p>Policy D.DH6 (part 2): Insertion of 'in general' would weaken policy and is therefore not acceptable.</p> <p>Policy D.DH6 (part 3): Retain 'significantly' as this is an important principle for the siting of new tall buildings outside the tall building zones.</p> <p>Agree with change to policy D.DH6 (part 3):</p> <p>c. unlock significant infrastructure constraints, and/or d. deliver significant additional publicly accessible open space.</p> <p>Paragraph 3.74 will be amended to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c:</p>	<p>Policy D.DH6 part 1 contains a number of established principles to ensure that the design of new tall buildings achieve exemplary standards, as required by the London Plan. Amendments are proposed as follows:</p> <p>Part 1a: and in keeping with take account of the character of the immediate context and of their surroundings;</p> <p>Part 1b: achieve exceptional architectural quality and using robust and durable materials integrated at all angles of throughout the building.</p> <p>Policy D.DH6 (part 2): Insertion of 'in general' would weaken policy and is therefore not acceptable.</p> <p>Policy D.DH6 (part 3): Retain 'significantly' as this is an important principle for the siting of new tall buildings outside the tall building zones.</p> <p>Agree with change to policy D.DH6 (part 3):</p> <p>c. unlock significant infrastructure constraints, and/or d. deliver significant additional publicly accessible open space.</p> <p>Paragraph 3.74 will be amended to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c:</p>

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									<p>the heart of Aldgate. It is noted and encouraged that Section 3 confirms that development of tall buildings outside of the designated Tall Building Zones are not precluded provided they meet the requirements to: strengthen the legibility of a town centre or mark the location of significant within the area; provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape; unlock significant infrastructure constraints; and/or deliver significant additional publicly accessible open space. We have outlined amendments below to the current wording of the Tall Building policy. 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and [delete <in keeping with the character of the immediate context and of their surroundings>] The highlighted struck through text part can only operate where a site is surrounded on all sides by tall buildings already. That is not practicable, and would effectively make other parts of the policy inoperable. Suggested change: insert <'reflecting their context and its character'> b. achieve exceptional architectural quality and innovative and sustainable building design, using robust and durable materials [delete <integrated at all angles of the building;>] The phrase 'all angles of the building' is not clear or precise. It is not necessary and should be removed. The concept of exceptional architectural quality, articulated earlier in 1 b is sufficient and comprehends the phrase to be struck. c. enhance the character and distinctiveness of an area without adversely affecting established [delete <valued townscapes>] and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings; The term 'valued townscapes and landscapes' is not clear or precise and is subject to interpretation, based on judgment. The phrasing introduces a lack of clarity and imports into urban design policies the concept of valued landscapes from paragraph 109 of the Framework. This has led to considerable disputes, including in the courts. It should be avoided here, and hence removed, in order to ensure precision and clarity of policy, in the interest of avoiding ambiguity. delete <f. maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced residential environment;> This part is not necessary, since other policy areas deal with residential amenity. Its insertion here suggests another test in policy. A cross reference to amenity policies would be more efficient, clear and precise. delete <g. demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes;></p>			<p>In such locations, tall buildings will be expected to serve as landmarks and unlock significant strategic infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities, new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area) to address existing deficiencies within the area and future needs (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies)</p> <p>The extent of the Aldgate tall building zone is based on the analysis undertaken through the Tall Building Study and the boundary is considered to be appropriate in the context of local heritage sensitivities, including the adjacent conservation area.</p>

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									<p>This part is not necessary since it reproduces other regulatory regimes (for example health and safety and fire). i. provide [insert <'where appropriate'>] high quality private and communal open space and play areas (where residential uses are proposed) which local residents can use and that encourage social cohesion; The proposed change, an insertion, introduces flexibility in the application of policy. 2. Development of tall buildings will be directed [insert <'in general'>] towards designated Tall Building Zones (as shown on the Policies Map and figure 8) and must apply the following design principles. The suggested alteration, insertion, is intended to avoid conflict with the following policy limb, which allows for exceptions. 3. Development of tall buildings proposed outside of these zones must: a. [delete <significantly>] strengthen the legibility of a town centre or mark the location of transport interchange or other location of civic or visual significance within the area; The struck through word, 'significantly', should be removed because it introduces lack of clarity into the policy. What is the difference, practically, between 'strengthen' and 'significantly strengthen'. The degree of planning judgment involved in ascertaining this distinction is too wide practically to be workable and in the interest of precision the qualifying word should be struck. c. unlock significant infrastructure constraints [insert <', including additional public open space or its improvement',>] or enable the delivery of particular public benefits not otherwise achievable. [delete <and/or>] There may be other cases where it is desirable There may be other cases where it is desirable to vary from policy, in the interest of achieving otherwise unfundable public benefits. This justification needs to be restricted or undermine the intent of the policy. The drafting inclusion of 'and/or' here is unclear. How are the parts of the policy to be read. If it is as alternatives, then 'or' should be included. It is plain that exceptions cannot rely on the cumulative reasons, so 'and' is inappropriate. delete <d. deliver significant additional publicly accessible open space.> It is better to combine 3 and 4 in the interest of clarity. The baseline study supporting the policy and its locational objectives is welcome. However, it is not clear to us why the 'Aldgate' zone is so tightly drawn, albeit we presume that is to exclude conservation areas. In that part of the City Fringe which is also CAZ, we consider the narrow definition of a tall buildings zone is excessively restrictive, particularly bearing in mind that the baseline study does not rule out conservation areas as inappropriate for tall buildings as a matter of principle. Likewise the Historic England document, GPA4, on tall buildings, does not rule out tall buildings from conservation areas or other similarly sensitive land (e.g., settings of</p>			

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									listed buildings). All that best practice guide does is refer to the balancing provisions of the Framework at 133 and 134, as providing one justification for tall buildings. Additionally, we wonder at the relevance at such a narrow boundary when the policy itself in effect states that there are no real sites available left. If so, this questions the need and purpose of adopting such a policy area in the first place. It is our view that it is far more sensible, given the strategic importance of Aldgate (and its positive identification as an economic cluster at a key gateway), for the locational guidance to be less precise, adopting a broad locational approach, for instance a circle with porous edges. This would be preferable in other zones too, and is desirable because it allows for flexibility of application. The range of other policies relating to design and form of development would provide sufficient safeguards in any event. Note: No soundness test undertaken.			
1049487		Ashbourne Beech Property	LP104	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Effective			Policy D.DH6. Dealing with tall buildings. Part 1 of the policy sets out design criteria. Reference at part 1 b to “exceptional architectural quality” should be deleted. Also, what is “innovative and sustainable building design”? Part 2 of the policy states that development of tall buildings will be directed to designated Tall Building Zones. These include the Millwall Inner Dock (Isle of Dogs). In this area, building heights are to drop away from the Canary Wharf cluster to support its central emphasis and are to step down away from the centre of the cluster and ensure that the integrity of the Canary Wharf cluster is retained on the skyline when seen from places and bridges along the Thames etc. Part 3 of the policy states that the development of tall buildings outside these zones must, amongst others, significantly strengthen the legibility of a town centre or mark a transport interchange; provide sufficient distance from other landmark buildings to create a landmark in the townscape. The Millwall Inner Dock cluster includes Crossharbour as an area to where tall buildings should be directed. The district centre is an appropriate location for tall buildings. The current wording of the policy that heights step down to its boundaries is counter this position. How is the centre of the cluster defined? The way the “skyline of strategic importance” (Figure 7) relates to the Tall Building Zones (Figure 8) needs to be clarified. The evidence base includes a 2017 Tall Buildings Study. Regrettably it has proved difficult to access this document which has delayed a consideration of the material that is set out. Initial comments on this are as follows: • P7 provides the context to the Study, noting that the existing policy framework has provide “inadequate as a means to resist applications...” It is unfortunate that this forms the context to the study that should be about identifying a suitable framework	Yes		Meeting the policy criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. The following amendment to policy D.DH6 (part 1) seeks to clarify this: 1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must: This site was assessed as part of the Tall Buildings Study which provides the basis as to why the buildings should step down from north to south and towards the edges of the zone to protect the skyline of strategic importance. The Views and Landmarks Topic Paper (SED15) provides further information about the skyline of strategic importance designation to support the examination in public.

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								to promote sustainable development, including tall buildings; • The notation at figure 3.7 of the Crossharbour centre reflects yet another boundary of the district centre. A consistent boundary is essential for the purposes of plan making; • The plan at figure 3.12 identifies broad PTAL ranges. It is noted that those for Crossharbour do not appear below PTAL 2 (small portion of the western edge of the centre), whereas the site allocation in the draft Plan sets out a PTAL range from 1b. The PTAL range should be clarified and a consistent level identified; • P59, figure 4.5 includes reference to approved tall buildings. That for Asda (2014) was for 23 storeys (not 21); • The characterisation of place: Cubitt Town, pp160 – 165, identifies, amongst others, townscape features as including “views to Canary Wharf from Parks”. As per the Tall Building Study, this should be amended to refer to “views to Canary Wharf cluster from Parks” • The Tall Building Zones are discussed at pp196 – 199. Figure 7.2 is a diagram depicting “Relationship between Canary Wharf and adjacent clusters”. This diagram needs further explanation alongside the text at paragraph 3 which notes, amongst others that development should as a principle “be no higher than two thirds of the height of the Canary Wharf cluster (i.e. maximum 155M AOD)...” Owing to the difficulties experienced accessing this document we reserve the right to submit further comments regarding this matter once the document has been able to be reviewed.			
1142493		Berkeley Group	LP400	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No			D.DH6: Tall buildings Density should be design led and each proposal assessed on its own merits. Cumulative impacts of development should in large part be mitigated by CIL, this is not an appropriate test for 'density' Soundness test: Revise to make deliverable and therefore effective. Consistency with London Plan policy 7.7	Yes		<p>The location of the tall building zones was considered through the Tall Building Study. A number of tall building zones were identified within the opportunity areas where accessibility levels were high. Not all of the opportunity areas and/or site allocations were considered appropriate for inclusion within a tall building zone due to heritage sensitivities and accessibility constraints.</p> <p>For clarity, additional text will be added to paragraph 3.75 stating that we will work with developers to guide the location of tall buildings in site allocations:</p> <p>This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant policies.</p>

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1142590		British Airways plc	LP480	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	N/A		<p>Policy D.DH6 (Tall Buildings) We broadly support policy D.DH6 (Tall buildings) but seek clarification with regards to the wording of paragraphs 1a, 1c,1e and 1i. London is a changing place, and as the roles and the fabric of places evolve, so do building typologies. This is a natural process in city change. To 'fix' London would be to severely constrain its ability to accommodate growth and policies should therefore be designed to encourage and manage this growth whilst recognising that places can and will change. The flexibility should therefore be given to redefine not only Tower Hamlet's 24 places, but also to deliver development which contributes to the future of London as a global city. As such, we suggest text amendments to part 1a as follows: 1. Development with tall buildings are required to: a. be of a height and scale, mass and volume INSERT <that have regard to> DELETE <are proportionate to their role, function and importance of the location in> the local, borough-wide and London context; and DELETE <in keeping> INSERT <to> the character of the immediate context and of their surroundings; New development will almost certainly have an impact on existing townscape and rooflines. Flexibility should be provided so that where change occurs any impacts arising from that change form part of the planning balance which considers the wider benefits of a proposal, whether in townscape or broader terms. Therefore, we suggest text amendments to part 1c as follows: a. enhance the character and distinctiveness of an area without INSERT <materially> adversely INSERT <affecting> DELETE <affected> established valued townscapes and landscapes (including building/rooflines) or INSERT <materially> detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings INSERT <except where any harm is outweighed by the benefits brought forward>; Plans for</p>			<p>Meeting the criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. The following amendments are proposed:</p> <p>Part 1: Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must:</p> <p>a.....and in keeping with take account of the character of the immediate context and of their surroundings; Part 1b: b. achieve exceptional architectural quality and using robust and durable materials integrated at all angles of throughout the building.</p> <p>Insert into the glossary: Urban super block: An urban block created by one large building surrounded by streets.</p> <p>Figure 9 is considered to give a useful illustration of the cluster principles in the Tall Building Study.</p>	

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								<p>new development are constantly being brought forward in London, and whilst the wider context of a site is a consideration in the assessment of any proposals, in a climate of great demand for housing, employment and commercial space the principle of assessing developments on their potential future impact on neighbouring plots (unless these plots are allocated as development sites in planning policy or there is a live or extant permission) is not considered to be a material planning consideration. Preventing a development coming forward based on the possibility that an adjacent site may come forward may create delays in planning decisions and ultimately stifle delivery. As such, we suggest that part e is deleted. In terms of private and communal amenity space in some instances, the design approach may not allow for shared access (for example roof top amenity areas). Therefore, we suggest that the wording of part i of the condition is updated to read: i. provide high quality private and communal open space and play areas (where residential uses are proposed) which INSERT <where appropriate to the typology of building> local residents can use and that encourage social cohesion We fully support the designation of the Canary Wharf cluster as a tall building zone, as stated in Policy D.DH6 (Tall buildings). The text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones currently states: · Development within this location will be expected to safeguard the skyline and preserve the iconic image and character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. · Individual buildings should be integrated into urban super blocks set in the public realm. · Building</p>				

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								<p>heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square. However, the draft report of the Tower Hamlets Tall Building Study identifies several key consented developments within the neighbouring Canary Wharf cluster which exceed or are similar height to the 235 m AOD height set by 1 Canada Square. These include Landmark Pinnacle (formerly known as City Pride) at 239 m AOD, Spire London (formerly Hertsmere House) at 240.5 m AOD and the existing consent referenced previously for the Riverside South scheme which totalled 241 m AOD at its tallest point. Other schemes often appear taller than 1 Canada Square in the context of perspective and, in our view, the iconic roof form of 1 Canada Square is sufficient to mark it out without it needing to be the tallest building in the vicinity. With these significant landmark schemes coming forward and shaping the borough's skyline, the requirement for building heights to step away from the central location of 1 Canada Square as stated on page 50 of the draft emerging Local Plan as part of policy D.DH6 appears both outdated and ineffectual. Indeed, the growth of these new skyscrapers will be seen to further expand the cluster of Canary Wharf as a whole, enhancing the already distinct iconic skyline and making best and most efficient use of these sites. We therefore propose that the text in the table of section 2 of Policy D.DH6 for the Canary Wharf (Isle of Dogs) Tall buildings zones should be amended to read the following: · Development within this location will be expected to safeguard the skyline and preserve the iconic image and INSET <dynamic> character of Canary Wharf as a world financial and business centre. Individual buildings should be integrated into urban super blocks set in the public realm. Building heights within the Canary Wharf cluster should DELETE <drop away</p>				

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							<p>from the central location at 1 Canada Square> INSERT < be in keeping with the character of the immediate context of their surroundings, and should enhance and provide a positive contribution to the Canary Wharf skyline.> ·DELETE < Individual buildings should be integrated into urban super blocks set in the public realm.> · DELETE <Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square.> We suggest that the term 'urban super block' is clearly defined, and suggest that this should not be the only urban form noted as appropriate. The changes proposed above are supportive with section 1 of Policy D.DH6 and therefore offer consistency when considering tall building proposals against emerging policy. We request the deletion of figure 9 (Principles of tall building clusters) as it oversimplifies the concept of tall building clusters which will typically be appreciated in three, not two, dimensions.</p>				

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1142548	Grafton Group PLC	Grafton Group PLC	LP428	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				NOTE THAT SAME COMMENTS REPEATED UNDER DEVELOPMENT PARTNER Policy D.DH6 Tall Buildings The overarching principles of the policy are supported. However, we object to the following wording that specifically relates to the Leamouth Tall Building Zone. The policy as currently drafted requires that: 'Tall buildings in this cluster should step down towards the River Thames and ensure glimpses and views across the cluster'. We object to this wording and do not consider that the policy is sound in this form. Rather than setting out an arbitrary requirement for tall buildings to 'step down' towards the river, it would be more appropriate for the policy to make reference to the fact that tall building proposals in this cluster need to be contextual having regard to the relationship between the existing townscape and emerging development proposals. In this regard, a tall building does not necessarily need to step down towards the river as a means of avoiding harmful impacts. Indeed, some of the tallest buildings in London are located adjacent to the river without giving rise to such impacts. In addition, we have reviewed the Tower Hamlets Tall Building Study (2017). It notes on p. 177 that 'Development of tall buildings is considered appropriate in Leamouth however this needs to be co-ordinated as part of a wider vision for the riverside extending from Canary to Leamouth and to avoid creating a wall of buildings along the river.' The Tall Building Study is a comprehensive background analysis to support the Local Plan's approach to the location of tall buildings, however, it does not specifically reach the conclusion that buildings in the Leamouth Cluster need to step down towards the river. As such there is no evidence base to support this policy wording. Instead, it advocates avoiding a wall of buildings along the river and this can appropriately be managed through the layout / placement of taller buildings, as opposed to an arbitrary position on their overall height. To make the policy wording sound we recommend that this section of the policy should be redrafted as follows: 'Tall buildings in this cluster need to be well considered having regard to the surrounding context, including building heights, to ensure glimpses and views are maintained across the cluster.'			No change to the principles for tall building zone considered necessary. Retain existing wording as it reflects the layout of approved schemes and the location of Metropolitan Open Land.

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1142035		Hermes Property Unit Trust	LP154	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	Yes			<p>Policy D.DH6: Tall buildings We note the definition of 'Tall buildings' provided in paragraph 3.64. we do not however consider that a building twice the height of its surroundings should constitute a tall building. For example, a development may propose a 4 storey building, which sits alongside a site that contains an existing 2 storey building. By definition the proposed 4 storey building would then constitute a tall building. We do not consider this reasonable or appropriate. We would suggest that the 30m height standard, as advocated by the London Plan should form the definition of a tall building. We consider that Criteria a) of the policy should also allow for consideration of on-site context, as larger sites are capable of accommodating taller buildings that do not necessarily impact on adjoining character and context. The policy should also take into account site constraints and viability considerations and how higher density development, including tall buildings assists in the ability of the site in delivering the wide ranging policy requirements (including CIL and other financial contributions). Criteria b) should define the word 'exceptional', to avoid subjective interpretations of policy. The Plan should, throughout, provide applicants with clarity, which in turn will assist the Borough in delivering its Vision and Objectives both in terms of housing and employment growth. Part 2 of the policy sets out the locations where tall buildings should be directed. As stated above, we consider a definition of what constitutes a 'tall building' would be helpful. Moreover, tall buildings should be considered on their merits, as provided by the majority of the Part 1 of the policy. Local Plans should not be prescriptive in terms of development, within this context, it is considered that the policy, generally, is overly prescriptive and subjective in terms of superlatives and the quality of</p>		Yes	<p>The definition of tall buildings as those greater than twice the height of surrounding buildings in policy does not preclude tall buildings coming forward but rather enables officers to carefully consider and manage their impact.</p> <p>Whilst taller buildings may be able to come forward on larger sites this will be considered on a site-by-site basis and will be assessed against the principles contained in the site allocations.</p> <p>Meeting the criteria in policy D.DH6 (part 1) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. The following amendment to policy D.DH6 (part 1) seeks to clarify this:</p> <p>1. Developments with tall buildings are required to must be of exceptional architectural quality. To achieve this, proposals must:</p> <p>The viability of schemes will be considered at the planning application stage, although commercial viability will not over-ride design considerations.</p>

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								development expected, without much, if any consideration of how such development can be delivered viability or commercially. In terms of Part 3, we consider that criteria a) is too prescriptive in defining other acceptable areas or locations for tall buildings. Significant development of tall buildings has taken place within the Borough in locations outside of those locations listed in the policy. Part 3 a) as it currently stands, would contradict the criteria listed in Part 1 of the policy, which are the considerations of the acceptability of tall buildings throughout the Borough.				
1143412		J P Morgan Chase	LP912	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified; Consistent with national policy			Summary 1. We are concerned that this policy does not recognise that Riverside South benefits from an extant planning permission for tall buildings, including one of a greater height than 1 Canada Square. It is therefore considered that the tall buildings policy as currently drafted is unsound. We consider the particular relevant material considerations below. Assessment 2. Part 2 of the policy identifies Tall Building Zones and sets out design principles which apply to the Tall Building Zone. 3. In respect of the "Canary Wharf (Isle of Dogs)" zone, the policy states that inter alia "Building heights within the Canary Wharf cluster should drop away from the central location at 1 Canada Square". This tall buildings cluster principle is also set out at supporting paragraph 3.72 and in Figure 9. 4. Page 152 of the Tall Buildings Study (forming part of the Evidence Base) states "Canary Wharf is of exceptional height and provides a cluster of tall buildings that step up to the 50 storey {235m AOD} office at 1 Canada Square in the centre". 5. It is important to note however, that the 2009 planning permission for Riverside South approved two towers of 241.1metres AOD and 191.34m AOD. These heights are identified in the Tall Building Study (July 2017) (p.58 & p.153). A material operation under the 2009 planning permission was carried out within the specified time limit and therefore the permission remains alive and would be a material consideration for any future planning application. 6. It is also to be noted that in the Committee Report for the Newfoundland scheme (adjacent to the Riverside South site) (ref: PA/13/1455 and PA/13/1456), the height of a previously consented hotel proposal (of 150m, compared to the 226m tower being proposed) was referred to. Therefore, the Council has previously accepted that the height of a previously consented scheme (even if it was for a different use) is relevant to whether a height is appropriate for an area, and	Yes		The Tall Building Study acknowledges that there are a number of consented schemes in the Canary Wharf cluster that are of a similar height to One Canada Square. The policy responds to the recommendation that the identity of the cluster is not lost through intensification should the cluster expand further. Policy D.DH6 seeks to more carefully manage heights coming forward in the Canary Wharf cluster and future proposals for Riverside South will need to take into account the new policy, principles contained in the site allocation and the consented scheme.

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									<p>also that much higher towers than what was previously consented may be appropriate. The analysis used in the Newfoundland report also assumed the 241m tower on Riverside South would be built out, and considered that the 226m tower consented at Newfoundland would "be in keeping with the surrounding scale of development". 7. The tallest building on the Riverside South site is permitted some 6 metres taller than 1 Canada Square. 8. A Summary in respect of Canary Wharf is set out at p.153 of the Tall Building Study and states inter alia "1 Canada Square remains at the centre of the tall building cluster but the cluster is expanding and a number buildings under construction are of a similar height. It is a clear representation of the major centre and the tallest buildings should represent the heart of the financial district where the offices, station and shopping centre are located.... The supporting residential areas should be secondary and therefore of a lower scale that steps away from the taller centre Stepping down too slowly will result in the centre of the cluster becoming invisible from medium range views."9. The draft policy and Tall Buildings Study does not appear to consider the specific locational and site circumstances that allow for a very tall building on the Riverside South site. Details of these locational and site circumstances are set out in the Committee Report for the 2005, 2008 and 2009 schemes. We note that in respect of the 2009 scheme (ref: PA/08/2249) the Committee Report states inter alia "The scheme has demonstrated consideration of the appearance of the building as viewed from all angles and is considered to provide a positive contribution to the skyline". 10. The quotation from p.153 of the Tall Building Study noted above acknowledges that the cluster is expanding i.e. to include buildings under construction and consented. Many of these are of a similar height to 1 Canada Square and this is judged acceptable. However, this acceptance is not acknowledged in draft Policy D.DH6. As a result the draft Policy is not justified. 11. With the above in mind, it is important that the tall buildings policy and Canary Wharf tall building zone recognise that Riverside South benefits from an extant planning permission with a building proposed to be taller than 1 Canada Square. The design principle set out in draft policy D.DH6 (Part 2), which states that building heights should drop away from the central location at 1 Canada Square is a misnomer, and therefore as currently drafted the policy is unsound and unjustified. 12. It is to be expected that any future proposals for the Riverside South site would be at least as tall as the extant scheme. Accordingly, the tall building zone principle at Part 2 of the draft policy should acknowledge the opportunity presented by Riverside South. Proposed</p>			

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									Changes: 13. The design principles for the Canary Wharf cluster should be amended to confirm that "Building heights within the Canary Wharf cluster should INSERT <generally> drop away from the central location at 1 Canada Square". In addition, we strongly advocate a fourth principle be added to Part 2 "Proposals for very tall buildings will be considered on their individual merits". 14. These changes to the policy will ensure the policy is sound.			
762218		Lanark Square Ltd	LP569	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified			The designation of tall building zones is supported, particularly in relation to the Isle of Dogs. These comments relate specifically to the Millwall Inner Dock (Isle of Dogs) Tall Building Zone which states building heights in this cluster should drop away from the Canary Wharf cluster in order to preserve its iconic skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in the London Views Management Framework. This transition in height of buildings from Canary Wharf is recognised, however, it is suggested that more flexibility is built into the policy to encourage the heights of tall buildings to respond to transport interchanges, areas with high levels of accessibility and site specific townscape characteristics. This position is supported in the London Plan and the strategic direction of the Mayor of London.	Yes		The supporting text (paragraph 3.72) states that the Tall Building Study should be read alongside the policy. It also recognises that there may be variations in heights within the zones, and that there is a step down towards the edge of the zone. No change is required.
1142353		New City College	LP936	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Tall Building Zones Tall building zones have been laid out on the Policies Map and described as part of Policy D.DH6 in the draft local plan. Whilst we recognise that the policy does not preclude tall buildings outside of the zones as drawn on the policies map, it is our view that site allocation 4.1 Aspen Way should be within a tall building zone. The site is located close to the A1261 (Aspen Way), which the borough acknowledges causes "severance between the neighbourhoods to either side" The borough states that the site allocation for Aspen Way should enhance connections between neighbouring site allocations and ensure the streetscape, wider character and character are addressed. The site allocation also requires any development to improve north-south links. The character of the area is of a mix of uses, with tall buildings located very close by with Canary Wharf located just to the south. The Borough's policy is clearly to deliver growth here, as well as much needed new homes. The Urban Structure and Characterisation Study Addendum notes in Chapter 1 that the spatial barriers around Canary Wharf have stopped activity 'spilling over' and benefiting surrounding areas. There are two tall building zones locally, Canary Wharf to the south and Blackwall to the east as seen on the Policies Map and in Figure 8 of the Draft Local Plan. The Aspen Way site allocation is included in the 'place' Blackwall as laid out in Figure 4 of the proposed Local Plan. This			The Tall Building Study considered the place of Blackwall and did not consider the Aspen Way site allocation area as appropriate as a tall building zone due to its limited connectivity and adjacent conservation areas and lower height buildings.

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									<p>area of the borough along with Canary Wharf and Leamouth is designated in Fig 10 of the draft local plan (p64) as an area of “high growth” for housing with 56% of the borough’s housing pipeline to be delivered in this area. Tall buildings will be needed to meet this target. Given its key transport links, and the requirement to develop better linkages from Canary Wharf to the north it is our view allowing tall buildings on the Aspen Way site will also unlock significant infrastructure constraints. Looking further into the evidence base which the borough has used to develop the Local Plan, The Tall Buildings Study was published in September 2017. The study carefully assesses the issue of tall buildings in the borough, and characterises the borough according to the suitability of each area for tall buildings, based on London Plan Policy 7.7 which states that tall buildings ‘should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building’. The New City College site is located in Blackwall one of the borough’s 24 ‘places’. This designation of our site as part of this particular area seems to have been governed by the location of the A1261 road (Aspen Way) which is located directly to the south of New City College. However, the New City College site is adjacent to Canary Wharf, albeit severed by the road. The Blackwall area is described in the Tall Buildings Study in paragraph 6.15. It notes that the area is characterised by roads and that the connections to Canary Wharf are poor. There have been a number of tall buildings built to the east of this area in recent years. The tall building study states that parts of Blackwall are suitable for tall buildings, but given that “connectivity is compromised” this should be coordinated in order to “enhance the sense of place and deliver an improved pedestrian environment”. The study also notes that “there is a lack of a coordinated language between the disparate parts”. Given the requirement for improved north-south links and the suggestion that Canary Wharf’s activity should spread into surrounding areas, it is our view that the Aspen Way site should be incorporated into either the Canary Wharf or the Blackwall Tall Building Zone. Based on the diagrams in the Tall Building Study (2017) it seems that either the Tall Building Zone of Canary Wharf could be extended northwards, or the Blackwall Tall Building Zone could be extended westwards to take in the southern part of the Aspen Way site allocation. This would also allow for there to be a landmark building adjacent to the Poplar DLR station, coordinating better with the wider area and improving connectivity. It would also enable the activity in Canary Wharf to ‘spill over’ the road into the Aspen Way site allocation thereby improving connectivity and reducing the division caused by the</p>			

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									<p>A1261. The introduction of bridges across the A1261 as proposed in the site allocation would facilitate this. Although either of the zones nearby could be extended to cover the site, if the site were incorporated into the Canary Wharf tall building zone, this could address the current issue that has arisen with a number of tall buildings on the north side of Canary Wharf, but no transition or stepping down on that side. The current arrangement of buildings at Canary Wharf does not fit with the principles laid out in the Tall Building Study. Figure 7.5 taken from this document shows Cluster Principle One which states that height should vary but should drop down towards the edges of the cluster. The Study considered the Canary Wharf area and stated that the “surrounding residential areas should be secondary and of a lower scale that steps away from the taller centre”. The explanation in the text states “the height of tall buildings at the perimeter of a cluster should drop down and help mediate with the surrounding lower height”. Currently, 1 Canada Square is the tallest building and on this side of the cluster (unlike the other sides) there is no transition to the lower rise areas of South Poplar. In fact, there are a number of consented towers of a similar height which will be built around that building, in particular on North Quay, so it will already no longer stand out as the tallest building, which suggests that Policy D.DH6 should be reworded to take this into account. Once built, the towers on North Quay will give an even greater juxtaposition to the lower rise buildings to the north, with no scope for stepping down. On the other sides of the cluster, this stepping down of height is already emerging. This lack of step-down on the north side is not in line with the Cluster Principle One, nor is it in line with the policy set out in Chapter 5, Sub Area 4, Isle of Dogs and South Poplar, which states under “creating attractive and distinctive places”; massing should be delivered “in a varied but coherent manner that provides defined and engaging streets and spaces, while maximising levels of natural light and a transition in scale from surrounding areas.” Therefore, it is our view that in order to be compliant not only with proposed draft policies within the emerging plan but also as a clear response to the evidence base, Aspen Way site allocation should be included as part of a tall building zone.</p>			

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1142353		New City College	LP938	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Tall Building Zones Tall building zones have been laid out on the Policies Map and described as part of Policy D.DH6 in the draft local plan. Whilst we recognise that the policy does not preclude tall buildings outside of the zones as drawn on the policies map, it is our view that site allocation 4.1 Aspen Way should be within a tall building zone. The site is located close to the A1261 (Aspen Way), which the borough acknowledges causes "severance between the neighbourhoods to either side" The borough states that the site allocation for Aspen Way should enhance connections between neighbouring site allocations and ensure the streetscape, wider character and character are addressed. The site allocation also requires any development to improve north-south links. The character of the area is of a mix of uses, with tall buildings located very close by with Canary Wharf located just to the south. The Borough's policy is clearly to deliver growth here, as well as much needed new homes. The Urban Structure and Characterisation Study Addendum notes in Chapter 1 that the spatial barriers around Canary Wharf have stopped activity 'spilling over' and benefiting surrounding areas. There are two tall building zones locally, Canary Wharf to the south and Blackwall to the east as seen on the Policies Map and in Figure 8 of the Draft Local Plan. The Aspen Way site allocation is included in the 'place' Blackwall as laid out in Figure 4 of the proposed Local Plan. This area of the borough along with Canary Wharf and Leamouth is designated in Fig 10 of the draft local plan (p64) as an area of "high growth" for housing with 56% of the borough's housing pipeline to be delivered in this area. Tall buildings will be needed to meet this target. Given its key transport links, and the requirement to develop better linkages from Canary Wharf to the north it is our view allowing tall buildings on the Aspen Way site will also unlock significant infrastructure constraints. Looking further into the evidence base which the borough has used to develop the Local Plan, The Tall Buildings Study was published in September 2017. The study carefully assesses the issue of tall buildings in the borough, and characterises the borough according to the suitability of each area for tall buildings, based on London Plan Policy 7.7 which states that tall buildings 'should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building'. The New City College site is located in Blackwall one of the borough's 24 'places'. This designation of our site as part of this particular area seems to have been governed by the location of the A1261 road (Aspen Way) which is located directly to the south of New City College. However, the New City College site is adjacent to Canary Wharf, albeit severed by the road. The Blackwall area is described in			Repeated comment - see response to LP936

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									<p>the Tall Buildings Study in paragraph 6.15. It notes that the area is characterised by roads and that the connections to Canary Wharf are poor. There have been a number of tall buildings built to the east of this area in recent years. The tall building study states that parts of Blackwall are suitable for tall buildings, but given that “connectivity is compromised” this should be coordinated in order to “enhance the sense of place and deliver an improved pedestrian environment”. The study also notes that “there is a lack of a coordinated language between the disparate parts”. Given the requirement for improved north-south links and the suggestion that Canary Wharf’s activity should spread into surrounding areas, it is our view that the Aspen Way site should be incorporated into either the Canary Wharf or the Blackwall Tall Building Zone. Based on the diagrams in the Tall Building Study (2017) it seems that either the Tall Building Zone of Canary Wharf could be extended northwards, or the Blackwall Tall Building Zone could be extended westwards to take in the southern part of the Aspen Way site allocation. This would also allow for there to be a landmark building adjacent to the Poplar DLR station, coordinating better with the wider area and improving connectivity. It would also enable the activity in Canary Wharf to ‘spill over’ the road into the Aspen Way site allocation thereby improving connectivity and reducing the division caused by the A1261. The introduction of bridges across the A1261 as proposed in the site allocation would facilitate this. Although either of the zones nearby could be extended to cover the site, if the site were incorporated into the Canary Wharf tall building zone, this could address the current issue that has arisen with a number of tall buildings on the north side of Canary Wharf, but no transition or stepping down on that side. The current arrangement of buildings at Canary Wharf does not fit with the principles laid out in the Tall Building Study. Figure 7.5 taken from this document shows Cluster Principle One which states that height should vary but should drop down towards the edges of the cluster. The Study considered the Canary Wharf area and stated that the “surrounding residential areas should be secondary and of a lower scale that steps away from the taller centre”. The explanation in the text states “the height of tall buildings at the perimeter of a cluster should drop down and help mediate with the surrounding lower height”. Currently, 1 Canada Square is the tallest building and on this side of the cluster (unlike the other sides) there is no transition to the lower rise areas of South Poplar. In fact, there are a number of consented towers of a similar height which will be built around that building, in particular on North Quay, so it will already no longer stand out as the tallest</p>			

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									building, which suggests that Policy D.DH6 should be reworded to take this into account. Once built, the towers on North Quay will give an even greater juxtaposition to the lower rise buildings to the north, with no scope for stepping down. On the other sides of the cluster, this stepping down of height is already emerging. This lack of step-down on the north side is not in line with the Cluster Principle One, nor is it in line with the policy set out in Chapter 5, Sub Area 4, Isle of Dogs and South Poplar, which states under "creating attractive and distinctive places"; massing should be delivered "in a varied but coherent manner that provides defined and engaging streets and spaces, while maximising levels of natural light and a transition in scale from surrounding areas." Therefore, it is our view that in order to be compliant not only with proposed draft policies within the emerging plan but also as a clear response to the evidence base, Aspen Way site allocation should be included as part of a tall building zone.			
1142365		Newport Holdings Ltd	LP219	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Draft Policy D.DH6: Tall Buildings Draft Policy D.DH6 is supported, particularly the reference to Aldgate as a 'tall building zone'. However, it is not reasonable to require that in every case 'tall buildings should actively increase the quality and extent of the public realm in this area'. This should be required where appropriate and where feasible. We	Yes		It is likely that tall buildings coming forward would increase the densities in the area and therefore it is not unreasonable that the development should incorporate improvements to the public realm locally. No change is required in response to this representation.

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									therefore suggest that the wording is amended to state 'tall buildings should actively increase the quality and extent of the public realm in this area where appropriate and feasible'. In order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.			
1033284	Unknown	One Housing Group	LP397	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified; Effective			The proposed amendment to Policy D.DH6 (formerly Policy DH5 in the Regulation 18 Local Plan) now seeks to direct the development of tall buildings "toward" Tall Building Zones rather wholly "within" them, which is welcomed as it recognises the potential role of other new individual tall buildings across the Borough, in accordance with the "Tall Buildings Study" (September, 2017) evidence base. However, it is considered that Policy D.DH6 is neither justified nor effective for the reasons set out below. The draft Tall Buildings Study (July 2017) included a Tall Building Zone for the Millwall Inner Dock Cluster, which was generally bounded by Westferry Road and Manchester Road. The extent of the zone was consistent with the analysis and the principles of the study, which recognised that the height of tall buildings within a cluster should drop away from the centre to the periphery to avoid creating a wall of development at the perimeter. The final version of the Tall Buildings Study contains a singular substantive change compared with the draft version, which is to reduce the extent of this Tall Building Zone to exclude estates managed by One Housing and some surrounding properties, with no amended explanation or justification. Policy D.DH6 is not therefore considered to be justified. The effect of this change is that Tall Building Zones now adjoin the Barkantine and St John's estates on three sides, creating a disjointed approach to building heights rather than the gradual transition down from One Canada Square to the River Thames (north of Greenwich) sought by the draft study. The area removed already contains a number of tall buildings with, for example, the four point blocks on Barkantine Estate being 64 metres high. Policy D.DH6 is not considered to be effective because it is not in general conformity with the London Plan, which states in the supporting text to Policy 7.7 that "ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area." Policy 7.7 states that tall buildings should be part of a plan-led approach that	Yes		The Millwall Inner Dock tall building zone incorporates the four site allocations in the area as these contain those sites most appropriate for the development of new tall buildings. Whilst there may be scope for further tall buildings in this part of the Isle of Dogs, it was not considered appropriate to designate the site as part of the Millwall Inner Dock tall building zone. We consider that a more detailed level of consultation is required with residents of the estate should development come forward, in accordance with the Mayor of London's draft Good Practice Guide to Estate Regeneration to ensure that regeneration of London's housing estates happens with resident support and engagement.

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									identifies appropriate locations. The Tall Buildings Study provides no justification why the original cluster is no longer considered to be an appropriate location. Reinstating the full extent of the Tall Building Zone would be consistent with the analysis within the evidence base and consistent with other Tall Building Zones, which also include land that is neither allocated for development nor an approved, under-construction or completed tall building. It would also positively respond to the scale of the housing shortfall identified below and provide additional flexibility to improve living conditions on One Housing's estates if future studies and consultation conclude this is appropriate. Reinstating the full extent of the Tall Building Zone would also potentially allow for an increased number of homes within walking and cycling distance of the global financial and business hub at Canary Wharf. This would help to realise Canary Wharf's future economic potential without adding unnecessary pressure to the capacity of the public transport network, which is recognised in the Local Plan as one of the Borough's biggest challenges. Improvements to the Docklands Light Railway will also provide additional transport capacity for this part of the Isle of Dogs, thereby increasing the development potential and making the area further suitable for tall buildings.			
1033284	Unknown	One Housing Group	LP399	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Effective			One Housing supports the emphasis Policy S.H1 places on meeting housing need by securing at least the housing target within the London Plan (at least 3,931 new homes per year). However, it is noted that a shortfall of 4,510 dwellings remains towards the end of the Plan period. LB Tower Hamlets commit at Paragraph 4.8 to working with partners, including the Greater London Authority, to maximise housing supply within the parameters of sustainable development and address this unmet need. Whilst One Housing supports the recognition in Policy S.H1 that housing estate regeneration schemes on unallocated sites will be one way that housing needs would be met, the Local Plan fails to allocate sufficient land to meet the minimum housing target set out in the London Plan. It is recognised that the Local Plan exceeds the objectively assessed need identified in the Tower Hamlets SHMA (2017), however London's two tier planning system and extended Development Plan means that the Local Plan is not considered to be effective nor positively prepared if there is a reasonable prospect that it will fail to deliver the minimum housing target set out in the London Plan, which is based in part on the London SHMA (2013). Relying on measures including "higher-than-average density levels" are not considered to be justified when the Local Plan seeks to restrict the locations of Tall Building Zones. The NPPF places significant emphasis on deliverability and reinstating the full extent of the	Yes		Comments addressed under policy D.H2. Response in relation to policy D.DH6 above.

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									Tall Building Zone in Policy D.DH6 would provide additional flexibility and the greatest opportunity to ensure that the minimum housing target set out in the London Plan is met in the event that more ambitious regeneration plans are deemed appropriate on estates within the Isle of Dogs. Further to the above justification, London Plan Policy 3.11 is clear that there is a pressing need for more homes in London and that Boroughs should seek to "achieve and exceed" the minimum annual average housing target noted above. When the pressing need is viewed in the light of the proposed standard method for assessing housing need (Planning for the Right Homes in the Right Places, DCLG, September 2017), housing need is significantly increased for Tower Hamlets at 4,873 homes per year, which is 24% greater than the current minimum target set out in the London Plan. Whilst the transitional arrangements mean that the Local Plan is able to continue with its current approach to housing delivery if LB Tower Hamlets submit for examination by 31st March 2018, it is considered that the Council must show a higher likelihood of delivering the current minimum housing target and suggest that this is done through the Tall Building Zone measure set out above. One Housing supports Paragraph 4.10, which states that Tower Hamlets will undertake a review of the Local Plan to explore ways of addressing unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase housing supply, if the housing target is not being met. However, the Local Plan should do all it can to positively address the identified shortfall.			
1053884		Queen Mary University of London	LP471	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Positively prepared; Effective			Location of Tall Buildings In our previous representations, we acknowledged the wider pressures faced by the Council in relation to the delivery of housing in the Borough and the increasing requirement for housing to be provided in tall buildings. QMUL sought further clarity on Policy DH5 (Building Heights) Part 1a which set out that development of tall buildings is only acceptable in the identified 'Tall Buildings Zones'. QMUL recommended that the policy be amended to include reference to locations where tall buildings already exist, such as Whitechapel. QMUL are supportive of new Policy D.DH6 (Tall Buildings) which has been developed further in this iteration of the Local Plan. Whilst Part 2 provides detailed guidance on the design principles that should be applied within each of the Tall Building Zones, QMUL consider that the policy wording in Part 3 of the Policy could be strengthened to allow for the provision of tall buildings in locations where the precedent for tall buildings has been established. As noted in our previous representations the building height context at Whitechapel is set by the presence of the Royal London Hospital which reaches 85m at its			Whitechapel was not considered appropriate as a tall building zone due to its heritage constraints. Tall buildings are not precluded outside the tall buildings zone as long as they comply with the criteria in parts 1 and 3 of policy D.DH6.

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									<p>highest point. This is reinforced by other recent planning consents including approval for Whitechapel Central (Safestore) which will, on completion, provide three buildings ranging from 4 to 25 storeys. Given this context, we consider the area would be suitable for the provision of tall buildings, subject to the necessary considerations set out in Part 1 of the policy. Therefore, the principles outlined within Policy D.DH6 should apply to the Whitechapel area which would also be in line with the aspirations of the adopted Whitechapel Masterplan (2013). This sets out that, "In some areas, where redevelopment can provide significant regeneration benefits for Whitechapel, a new landmark building may be expressed as a high quality taller building". In addition, the LBTH 'Tall Buildings Study' evidence base document published in 2017 (Page 129) identifies that there are "further opportunities for change on vacant and under used sites around the Royal London Hospital to the south of Whitechapel Road. Some of these sites may be suitable for taller buildings but only if they provide significant community benefits particularly in respect of improved connectivity, enhanced legibility and in respect the heritage assets in the centre". QMUL would therefore welcome the recognition of Whitechapel as a location suitable for tall buildings, given the outcomes of the characterisation study and their intended use of these vacant sites to the south of the Royal London Hospital, which would provide community benefits. In principle, QMUL welcomes and supports the approach to the development of tall buildings as set out in Policy D.DH6 (Tall Buildings) Part 1 a to l. However, we would suggest within Part 3, that an additional point be made to allow for the development of tall buildings in areas where they are demonstrably appropriate in the context. Furthermore, Part 3a should be expanded to strengthen the legibility of a town or district centre, as Whitechapel is a designated district centre. Whilst paragraph 6.13 acknowledges that with the opening of the Elizabeth line and the emergence of a nationally important high-tech and bio-science cluster may allow it to be re-designated as a Major Centre, the current policies should encourage this growth and therefore should acknowledge it as a location for tall buildings. This would ensure that the plan has been positively prepared to accommodate the planned growth.</p> <p>SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption.</p> <p>Location of Tall Buildings – Reference to Whitechapel as an acceptable location for tall buildings given the</p>			

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									aspirations of the Whitechapel Masterplan.			
1142556	Regal London	Regal London	LP429	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				<p>Policy D.DH6 Tall Buildings The overarching principles of the policy are supported. However, we object to the following wording that specifically relates to the Leamouth Tall Building Zone. The policy as currently drafted requires that: 'Tall buildings in this cluster should step down towards the River Thames and ensure glimpses and views across the cluster'. We object to this wording and do not consider that the policy is sound in this form. Rather than setting out an arbitrary requirement for tall buildings to 'step down' towards the river, it would be more appropriate for the policy to make reference to the fact that tall building proposals in this cluster need to be contextual having regard to the relationship between the existing townscape and emerging development proposals. In this regard, a tall building does not necessarily need to step down towards the river as a means of avoiding harmful impacts. Indeed, some of the tallest buildings in London are located adjacent to the river without giving rise to such impacts. In addition, we have reviewed the Tower Hamlets Tall Building Study (2017). It notes on p. 177 that 'Development of tall buildings is considered appropriate in Leamouth however this needs to be co-ordinated as part of a wider vision for the riverside extending from Canary to Leamouth and to avoid creating a wall of buildings along the river.' The Tall Building Study is a comprehensive background analysis to support the Local Plan's approach to the location of tall buildings, however, it does not specifically reach the conclusion that buildings in the Leamouth Cluster need to step down towards the river. As such there is no evidence base to support this policy wording. Instead, it advocates avoiding a wall of buildings along the river and this can appropriately be managed through the layout / placement of taller buildings, as opposed to an arbitrary position on their overall height. To make the policy wording sound we recommend that this section of the policy should be redrafted as follows: 'Tall buildings in this cluster need to be well considered having regard to the surrounding context, including building heights, to ensure glimpses and views are maintained across the cluster.'</p>			No change to the principles for tall building zone considered necessary. Retain existing wording as it reflects the layout of approved schemes and the location of Metropolitan Open Land.

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624910	Sir or Madam	Telford Homes PLC	LP265	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Telford Homes are aware of the development context along the DLR corridor, from All Saints Station to the Limehouse Cut, which is dominated with proposals for tall buildings. As such, this seems to contradict the policy requirement of D.DH6 to locate tall buildings within 'Tall Building Zones', which does not include this corridor of permitted towers. As such, it is recommended that this policy is redefined to allow the development of tall buildings in areas other than the aforementioned zones, such as in town centres. Telford Homes notes that part 3a of the policy mentions 'town centres', albeit in an unclear fashion. The policy wording should be amended to read "significantly strengthen the legibility of, or be included within, a town centre." This would provide clarity on the subject of tall buildings, and provide support for the development of sites with densities appropriate to the recommendations set out in London Plan.			Tall buildings are not precluded outside the tall building zones if they meet criteria in parts 1 and 3 of policy D.DH6. Town centres have not been identified as tall building zones and proposals for tall buildings in these areas will therefore have to comply with criteria in policy D.DH6 (parts 1 and 3).
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP895	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Policy D.DH6: Tall Buildings This policy provides the opportunity for the development of tall buildings that will positively contribute to the immediate surroundings within the identified tall building zones. There is no specific allowance within the policy for taller buildings in the Opportunity areas. Given the need to deliver significant development in these areas, it is considered that taller buildings should be considered acceptable and directed to these locations where they can be shown as appropriate through supporting Townscape and Visual Impact Assessments. It is noted and encouraged that tall buildings outside of the designated Tall Building Zones are not precluded provided they meet the requirements to: strengthen the legibility of a town centre or mark the location of significance within the area; provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape; unlock significance infrastructure constraints; and/or deliver significant additional publicly accessible open space. The objectives of this are supported. It is noted in the supporting text at para. 3.64 that tall buildings are defined for the purpose of the policy as any building that is significantly taller than its local context and/or any building which has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building. It is considered that tall buildings should be assessed on their surrounding context as per the currently adopted Local Plan rather than based on a prescribed height. The English Heritage/CABE "Guidance on Tall Buildings" (2007) state that "it is not considered useful of necessary to define rigorously what is and what is not a tall			The approach in policy D.DH6 is to direct tall buildings to those areas appropriate to buildings of additional height, to reverse the trend that has seen the proliferation of new tall buildings across the borough in inappropriate locations as developments with tall buildings proposed outside the tall building zones will need to have better regard of their surroundings. The new definition of tall buildings as those greater than twice the height of surrounding buildings is considered to assist officers by giving greater scope for managing the development of new tall buildings in the borough. The definition in the glossary is inconsistent and will be amended to reflect that in paragraph 3.64: Tall buildings: Any building that is significantly taller than their surroundings its local context and/or have has a significant impact on the skyline. Within the borough, buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building.

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									building.” Whilst guidance has moved on since this time, the principle remains relevant. The previous definition of Tall buildings set out in the Core Strategy (2010) states that “any building that is significantly taller than their surroundings and/or have a significant impact on the skyline” and this is considered to be more appropriate.			
635451	National Grid Property Holdings		LP179	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No	Justified; Effective			If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. If needed please continue on a separate sheet of paper. Restricting tall buildings (as defined in the text of the policy) to specific areas within the Borough is unduly prescriptive. The criteria within the text for Part 1 of the policy is sufficient to safeguard against inappropriate use of tall buildings within the Borough without need to safeguard specific areas for this type of development. It is noted that Part 3 of the policy provides specific additional criteria for tall buildings outside of the specific Tall Buildings Zones. However, it is unclear whether it is a requirement to meet all of these tests to secure planning permission for a tall building outside of the zones or whether one of these criteria (a-d) is sufficient. If all of them, then this policy is too prescriptive and will make it very difficult for the Council to meet its housing targets over the Plan period. The London Plan confirms that Opportunity Areas and Areas for Intensification are appropriate for Tall Buildings subject to other criteria. Therefore, as a minimum these areas should be included within the areas seen to be appropriate for tall buildings. Remove reference to the specific Tall Buildings Zones and rely on the criteria within the policy to ensure that all buildings are located in appropriate areas. Or, state in the introduction to Part 3 that, “Development of tall buildings outside of these zones must meet at least one of the following criteria”. If the Tall Building Zones are to be retained, the policy should also confirm that Opportunity Areas and Site Allocations (within the Plan) are areas that have the potential for accommodating Tall Buildings as this will improve the prospects of the Plan being able to deliver its housing requirements over the Plan period.	Yes		Tall buildings are not precluded outside the tall building zones if they meet criteria in parts 1 and 3 of policy D.DH6. It was not appropriate to designate all opportunity areas/site allocations as tall building zones due to extent of these areas, and not all parts being suitable for very tall buildings due to limited connectivity and heritage constraints. This does not mean tall buildings will be precluded outside these areas, but they will need to address additional criteria in part 3 relating to design and infrastructure provision. Agree with change to policy D.DH6 (part 3): c. unlock significant infrastructure constraints; and/or d. deliver significant additional publicly accessible open space. Paragraph 3.74 will be amended to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c: In such locations, tall buildings will be expected to serve as landmarks and unlock significant strategic infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities , new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area) to address existing deficiencies within the area and future needs (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies)
635773	Al Mubarakia Ltd		LP205	PART 3: POLICIES, 3.59 Paragraph Policy D.DH6: Tall buildings	No				Policy D.DH6 (Tall Buildings) Policy D.DH6 sets out key zones where tall buildings would be acceptable, these locations are clearly defined. The policy goes on to state that development of tall buildings proposed outside of these zones must: • Significantly strengthen the legibility of a town centre or mark the location of transport interchange or other location of civic or visual significance within the area; • Provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape; • Unlock	Yes		Tall buildings are not precluded outside the tall building zones as long as they comply with the criteria in policy D.DH6 (parts 1 and 3). The policy seeks to strike an appropriate balance between flexibility and prescription in responding to proposals for new tall buildings. Agree with change to policy D.DH6 (part 3):

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								<p>significant infrastructure constraints; • Deliver significant additional publicly accessible open space.’ The Site is not located in an area identified as being suitable for the development of tall buildings. Notwithstanding this it is considered that the site and the surroundings are located in an area where there is a important emerging cluster of tall buildings, and thus any tall building within this area will contribute to and significantly strengthen the area’s ‘visual significance’. For example, we would highlight the recently permitted London Dock scheme located immediately west of the site which will include a 22 storey residential tower and Ballymore’s 21 Wapping Lane development to the south-east which, together, will signal the emergence of a tall buildings cluster in this location It is considered that the appropriateness of a tall building is dependent on a number of factors such as site specific and context factors. Therefore, whilst town centre and key zone locations are appropriate locations, there should be flexibility for the consideration of appropriate tall buildings in other locations, as Policy D.DH6 allows for. It is noted that although there are other contextual factors considered by LBTH as being suitable for the development of Tall Buildings, other locations such as the identified Activity Areas would be appropriate locations for the development of Tall Buildings which could also meet the contextual factors listed. The identified Activity Areas are locations bordering the Central Activities Zone (‘CAZ’) where development of a different intensity to the CAZ which also contributes to the strategic priorities is considered acceptable, as such it is considered that the THAA would be a suitable location for an increased density of development and thus appropriately designed tall buildings. Therefore, whilst the policy incorporates some flexibility, we would respectfully request that the policy wording is reflected to identify other locations which would be appropriate including THAA’s. The policy states that tall buildings must provide sufficient distance from other landmark buildings or clusters. However, it is considered that this policy should make the necessary provisions to ensure that future clusters can be developed in appropriate locations and given the site context this is considered to be an appropriate location for the future development of a tall building cluster.</p>			<p>c. unlock significant infrastructure constraints.; and/or d. deliver significant additional publicly accessible open space.</p> <p>Paragraph 3.74 will be amended to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c:</p> <p>In such locations, tall buildings will be expected to serve as landmarks and unlock significant strategic infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities, new transport interchanges, river crossings and educational and health facilities serving more than the immediate local area) to address existing existing deficiencies within the area and future needs (as identified in the Infrastructure Delivery Plan, the Regulation 123 List and other relevant strategies)</p>

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624580	Jason Larkin	Canary Wharf Group Plc	LP510	PART 3: POLICIES, 3.61 Paragraph	No	Positively prepared; Justified; Effective			It is unclear why para. 3.61 attributes blank facades and a poor street interface to tall buildings, this could apply to any poorly designed building. It is also not appropriate to make reference to the value of adjacent developments being undermined by tall buildings, property value is not a material planning consideration. These references should therefore be removed from para. 3.61. Further comments on the Tall Buildings Study (September 2017) and Conservation Strategy (September 2017) prepared by our heritage advisor Peter Stewart Consultancy are contained at Attachment 3	Yes		Blank facades can be a particular issue in developments of tall buildings due to the need to accommodate access to servicing etc within a limited footprint.
1143389	Sainsbury's Supermarket Limited		LP909	PART 3: POLICIES, 3.70 Paragraph	No	Positively prepared; Justified			A number of policies have been informed by the Tall Buildings Study (July 2017). Public consultation has not been undertaken on this document which is heavily relied on to inform the emerging Plan. As such, it is untested and there is no justification for the character areas assessed as capable of accommodating a tall building and the subsequent conclusions. It is considered that the tone of the document is negative in that it seeks to resist tall buildings in the first instance. Given the emerging clusters of tall buildings within the borough, the existing policy framework is considered 'inadequate as a means to resist applications that are too large or in inappropriate locations'. It is from this starting point that the emerging Local Plan policies have been prepared and consequently, we believe these policies (D.DH4 – Shaping and Managing Views; D.DH6 – Tall Buildings) cannot be described as positively prepared, nor is it justified as required by NPPF paragraph 182. Section 6 seeks to identify parts of LBTH which are appropriate for tall buildings. The Study analyses locations which could accommodate tall buildings which is limited to the London Plan Opportunity Areas. Those locations which are considered appropriate are largely located in the Isle of Dogs and South Poplar where tall buildings are already in existence (i.e. Canary Wharf and Blackwall). In the City Fringe however, the sites assessed are either considered inappropriate for tall buildings or where appropriate, it is heavily caveated that any tall building should respond to heritage sensitivities and avoid impact on LMVF strategic views. The only exception to this is Aldgate which is already a focus for tall buildings. The message within the Study is therefore that tall buildings are unlikely to be acceptable outside of areas in which tall buildings are already located. As such, the Study is inconsistent with the London Plan, which seeks to focus future growth in opportunity areas, for the purposes of the NPPF paragraph 182 requirement for effectiveness and Section 20(5) (a) Planning & Compulsory Purchase Act 2004 (conformity with the London Plan). The characterisation study of Whitechapel identifies the prevailing character of 4-6 storeys. The arrival of			Comments are noted. The Tall Buildings Study was informed by a spatial analysis of the borough and a review and assessment of the current development pressure/development pipeline for tall buildings across the borough. The identification of appropriate, inappropriate and sensitive areas for tall buildings was in response to London Plan and Historic England recommendations and supported by a detailed characterisation study.

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									Crossrail is considered to make Whitechapel a target for tall buildings. Tall buildings in Whitechapel Centre should however be located where they can aid legibility and deliver other enhancements to pedestrian connectivity in the centre. "Equally a tall building at the Sainsbury site could be considered but only if it brings with it improvement to the public realm and pedestrian experience in that part of the centre enhancing access to the station, school and the sports centre and is in itself of a high design quality". The concluding comments are seemingly contradictory in that Whitechapel is not an appropriate location for tall buildings but instead a sensitive location that could accommodate tall buildings if appropriately sited to respond to heritage sensitivities. It is considered therefore that the Tall Buildings Study does not provide an appropriate and robust evidence base to inform the relevant emerging Local Plan policies.			
1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP188	PART 3: POLICIES, Figure 8 : Tall building zones	No	Positively prepared; Justified; Effective			The Aberfeldy New Village lies within the Lower Lee Valley Opportunity Area an Intensification Area (Policy 2.13, London Plan) and an Area for Regeneration (Policy 2.14, London Plan) Policy 7.7 of the London Plan 'Location and Design of Tall and Large Buildings' states that tall buildings should be located within opportunity areas, areas of intensification, or town centres that have access to public transport. The Aberfeldy New Village Masterplan already has planning permission for a series of tall buildings (using the London Plan definition) of ten storeys and parameter plans approved for taller buildings (up to 41 metres AOD) and has, as such, been erroneously omitted from the Council's Tall Building Study. In this respect, the Local Plan is not proposing the most appropriate strategy based on sound evidence base. The Council's Tall Buildings Study, together with the wording of Policy D.DH6: Tall Buildings and the Proposals Map is not effective as it fails to properly consider the changing nature of the Aberfeldy Estate and the development already taking place here. As such, the Local Plan is not properly justified and is not proposing the most appropriate strategy based on a sound evidence base. Part 3 of the policy states that tall buildings proposed outside of Tall Building Zones should achieve 'significant' benefits. While the word 'significant' is repeatedly used it is not qualified and it is, therefore, not clear what is intended or required. As such, this part of the policy is not effective and fails the soundness test by not being able to be objectively assessed. To make Policy D.H6 Sound, • the Masterplan area (see Appendix A to the supporting letter) should be included within the Blackwall Tall Buildings Zone (Figure 8: Tall Building Zones, Page 53) and as shown on the Proposals Map: Tall Buildings Zone. • The boundary of this proposed Tall Building			The Aberfeldy Estate was assessed as part of Poplar Riverside in Tall Building Study and was not considered appropriate for inclusion in tall building zone due to its relatively low levels of accessibility.

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									Zone should be extended beyond the north side of the A 13 and along the eastern side of the A 12 to incorporate the Aberfeldy New Village Masterplan area.			
1142692	Cubitt Property Holdings Ltd		LP592	PART 3: POLICIES, Figure 8 : Tall building zones	N/A			Our client supports the designation of the Marsh Wall East area as a site which holds significant potential for new large scale mixed use development. In particular, the identification of the Marsh Wall East area as a suitable location for the development of tall buildings which contribute to achieving a suitable transition in building heights moving away from the tall buildings cluster in the Canary Wharf Major Centre, to the southern half of the Isle of Dogs. In particular, the designation of the site within the Canary Wharf tall building zone is supported, with the acknowledgement for new development to achieve a transition in height and form to maintain the significance and prominence of the Canary Wharf Cluster. In addition, it is noted that Policy DH6 of the LBTH Local Plan requires that proposals for tall buildings to be of a "height and scale, mass and volume that are proportionate to their role, function and context and in keeping with the character of the immediate context and of their surroundings". The site falls within the Isle of Dogs Opportunity Area and are covered by the South Quay Masterplan framework, which outlines the principles which provide prescriptive guidance on the form and composition of new development within this location. The site is identified in the South Quay Masterplan as a suitable location, for the development of a tall building (10+ storeys). Our client supports the classification of the site as a position which holds potential for the development of a tall building. It is considered that given the sites context within an opportunity area and the character of the immediate vicinity of the site there is an opportunity for the introduction of a tall building of exceptional architectural quality, which will		Yes		Noted. Comments provided in response to the representation on the site allocation.

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								provide a suitable transition in building scale and form from the Canary Wharf cluster to the north of the site. The site is in an area characterised by tall buildings, with The Madison development (54 storeys) immediately to the west and Dollar Bay (31 storeys) further to the east. As such it is considered that there is significant potential for the introduction of a tall building in the region of 50 storeys. This would fall within the transitional plane of building heights moving east from One Canada Square to Dollar Bay on the eastern boundary of the Isle of Dogs.				
624580	Jason Larkin	Canary Wharf Group Plc	LP511	PART 3: POLICIES, Figure 8 : Tall building zones	No	Positively prepared; Justified; Effective			Figure 9 – comments have been made on this above, and on similar diagrams contained within the separate Tall Buildings Study (2017) (see Attachment 3). To summarise: · Cluster principle 1 – we agree that modulation of height is desirable, but not necessarily within an overall ‘stepping-down’ strategy. · Cluster principle 2 is in conflict with section 3 of Policy D.DH6. · Cluster principle 4 - it should be clarified that the riverfront means the far side of the river; if it were near side of the river, riverside development could be limited to around 2-3 storeys. However, even such a general principle applied to the far side of the river is unrealistic and already superseded by consented and under-construction schemes in respect of Canary Wharf – for example, development at Wood Wharf will have a considerably greater apparent height than the central Canary Wharf towers in views from the riverside along Greenwich Peninsula. Where exactly on the riverfront would this be enforced from? Further comments on the Tall Buildings Study (September 2017) and Conservation Strategy (September 2017) prepared by our heritage advisor Peter Stewart Consultancy are contained at Attachment 3			Amend labelling in figure 9 for clarity: CLUSTER PRINCIPLE TWO: Tall buildings outside but within the vicinity of the cluster are not desirable CLUSTER PRINCIPLE FOUR: Tall buildings in the foreground of the clusters should not break the silhouette of this cluster when seen from the southern bank of the Thames riverfront

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1142184		East End Community Foundation	LP170	PART 3: POLICIES, Figure 8 : Tall building zones	No	Justified			With regards to the tall building zones identified in Figure 8, it is considered that the zones should be extended to include the land to the north of Aspen Way, incorporating the Aspen Way site allocation. This could be facilitated through the extension of the Canary Wharf tall building zone to the north to align with the Blackwall tall building zone; or through either the extension of the Blackwall tall building zone to the west. We would refer to the page 198 of the LBTH Tall Buildings Study, published July 2017, which states that 'the Blackwall cluster will broadly extend between Blackwall and East India DLR stations located to either side of Aspen Way and helping to bridge the severance that this causes.' It is considered that the provision of tall buildings at either side of Aspen Way towards Poplar DLR Station would further alleviate the fragmentation of the built form at either side of Aspen Way, whilst providing an opportunity to 'step-down' building heights from Canary Wharf to Poplar High Street.	Yes		Aspen Way was not considered appropriate to be included in a tall building zone in the Tall Building Study due to its site constraints included limited connectivity, surrounding low heights and adjacent conservation areas.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP323	PART 3: POLICIES, 3.73 Paragraph	N/A			Supporting text paragraph 3.73 notes that the Tall Building Study identifies other potentially suitable locations outside of the Tall Building Zones where tall buildings might be appropriate, depending on the nature of the proposals and where sensitive receptors have been addressed. These areas should be denoted on the revised Proposals Map and clearly identified within Section 3 of the Policy. As a minimum, such other areas should include strategic sites and Masterplan areas that require the delivery of additional housing / commercial floorspace by way of high density development.				For clarity, additional text will be added to paragraph 3.75 stating that we will work with developers to guide the location of tall buildings in site allocations: Additional text at the end of paragraph 3.75: This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant policies.

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1142186	Andrew Wood	Isle of Dogs NP Forum	LP129	PART 3: POLICIES, 3.75 Paragraph	No	Justified			We do not believe that this policy provides enough guidance given the exceptional densities currently being achieved in the area. Both the Spire and Landmark Pinnacle are achieving densities in excess of 5,000 habitable rooms per hectare versus a London Plan maximum recommendation of 1,100. The average of the last fourteen planning applications on the IoD indicates an average density of 900 homes per hectare versus 405 being recommended as a maximum in the London Plan. In addition, the evidence base for the South Quay Masterplan contains a series of reports that show the unsustainability of high density development (which are common on the IoD) without mitigation. The reports look at different ranges of density and the issues that density causes. The Local Plan does not indicate what mitigation should be when it comes to high density developments. For example, the 'Strategic Environmental Assessment for the South Quay Masterplan: Technical Appendices' produced by LUC in November 2014, on page 174, is Figure 4.1: Summary of SEA of Different Amounts of Development Options (Pre-mitigation). We do not believe that this policy, or others provides sufficient guidance as to what levels of density are acceptable and that more guidance should be provided based on the recommendations for mitigation and enhancement.	Yes		The plan should be read as a whole in relation to how the impacts of development can be mitigated through planned improvements to existing infrastructure. Minor modifications are proposed to policy D.DH7 (part 1a) and paragraph 3.79 in relation to clarifying how cumulative impacts will be assessed: Where the London Plan density ranges guidelines are exceeded, schemes must be of exemplary design quality and must address the issues cumulative impacts that can be associated with high density development, such as noise, disturbance, highways implications, loss of outlook and overlooking. In addition, developers should consider the capacity of infrastructure and services to accommodate the development including potential mitigation measures to provide additional capacity and unlock any identified constraints.
1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP463	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	No	Effective; Consistent with national policy			The current draft policy is not effective as it does not respond to changing requirements and it is not consistent with national policy. It is not positively prepared as the policy should be amended to support higher density in appropriate locations. The policy refers to 'Density Guidelines set out in the London Plan'. However, these are not planning policy and it is clearly stated in paragraph 3.28 of the London Plan that 'it is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential - local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).' The NPPF recognises at paragraph 59 that 'design policies should avoid the unnecessary prescription or detail on guidingdensity . . . of new development in relation to neighbouring buildings and the local area more generally'. There is a need to ensure that there is flexibility in determining appropriate densities to enable these to be responsive to context and location. In any event, the new draft London Plan is out for consultation on the 29 November 2017 and it is understood that the density matrix will be removed from the Plan. In addition, the Housing White Paper (paragraph 1.53) in particular states: To help ensure that effective use is made of land, and building on its			Comments are noted. Policy D.DH7 is consistent with the current London Plan and seeks to ensure that the cumulative impacts of high density developments are considered as part of the planning process. The supporting text to policy D.DH7 makes a number of references to the density matrix contained in the current London Plan. For clarity, and to allow for possible changes to the London Plan, amendments are proposed to the following paragraphs: 3.77: In order to manage this, the policy requires that developments in excess of the London Plan density guidelines should consider the cumulative effects from development... 3.79: Where the London Plan density ranges guidelines are exceeded, schemes must be of exemplary design quality and must address the issues cumulative impacts that can be associated with high density development, such as noise, disturbance, highways implications, loss of outlook and overlooking. In addition, developers should

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								<p>previous consultations, the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should:</p> <ul style="list-style-type: none"> • make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements; • address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations); that provide scope to replace or build over /ow-density uses (such as retail warehouses, lock-ups and car parks42); or where buildings can be extended upwards by using the 'airspace' above them; • ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs; and • take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances; for example, avoiding a rigid application of open space standards if there is adequate provision in the wider area. <p>Paragraph A.70 goes on to state ' While optimal densities need to reflect the nature of each site, the Government considers that indicative standards for particular types of location could be helpful in driving the right level of ambition in areas of high demand, and where it is reasonable to expect densities to be relatively high (such as in and around town centres and other locations that are well served by public transport).' In addition, part b to the policy is not relevant to density and is more associated to design. The reference to 'over-development' in the policy is not consistent with national policy as this term is not defined in the NPPF. To make policy D.DH7 Sound the following revisions are proposed and supporting paragraphs 3.76 and 3.79 be updated accordingly: Policy D.DH7: Density 1. Residential development should be consistent with the DELETE< guidelines set out in the> London Plan. DELETE <Where higher density development is proposed, it must demonstrate that:> INSERT: <Proposals should demonstrate how the density of new development has been informed by the character of the area. INSERT <Higher density development will be considered on a case by case basis and regard will be had to character, location, design and affordable housing provision> DELETE <a. the cumulative impacts of the proposed development have been considered and do not result in over-development or that suitable mitigation measures in relation to design and infrastructure have been identified; and> DELETE <b. the site does not compromise the development potential of neighbouring sites.></p> 			<p>consider the capacity of infrastructure and services to accommodate the development including potential mitigation measures to provide additional capacity and unlock any identified constraints.</p> <p>3.80: Developers are expected to include reference in their planning application the relevant London Plan density range guidance for their site and the actual net residential density proposed.</p> <p>An amendment is proposed to paragraph 3.78 to further explain what is meant by over-development and how it may need to be addressed by developers: For instance, this may be where a development necessitates a change in the management of existing infrastructure, or where it requires substantial capital investment to address additional demand created by the development.</p> <p>Other changes proposed to the policy are not supported as they would change the emphasis of the policy away from considering the cumulative impacts of development.</p>
1054270	BGYRL	Bishopsgate	LP325	PART 3: POLICIES,	Yes	The acknowledgement					Support for the policy is welcomed. Policy D.DH7 refers to guidelines set out in the

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		Goods Yard Regenera tion Limited		3.76 Paragraph Policy D.DH7: Density		that developments can exceed the density guidelines set in the London Plan, subject to demonstrating that the cumulative impacts of the development have been considered and do not result in over-development, or that suitable mitigation is provided through design, is supported. The London Plan seeks to optimise residential and non-residential outputs in Opportunity Areas. The Mayor's Housing SPG further states that Opportunity Areas should positively explore the potential for increased densities beyond those set in the London Plan. Therefore, the London Plan imposes no ceiling on density, instead, for Opportunity Areas it positively encourages exploration of whether its indicative ranges can be exceeded. Policy D.DH7 does not explicitly reference Opportunity Areas; to be consistent with regional policy this policy should refer to the acceptability of					London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.

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							sites within Opportunity Areas to exceed the density guidelines in the London Plan.					
1142692	Cubitt Property Holdings Ltd		LP604	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	N/A			The draft policy notes that where density exceeds the GLA recommendation the proposed development is required to exceed the minimum design standards of the Local Plan and London Plan. The design standards set out the minimum requirements for development and density should not be rigidly applied to an assessment of development proposals. The London Plan density matrix is a guidance of how density should be applied but this should not limit new development. The Local Plan should promote higher density development in appropriate locations such as Opportunity Areas and high PTAL areas where dense development can be accommodated to help meet the increasing housing demand				Comments are noted. The policy is consistent with the current London Plan and seeks to ensure the cumulative impacts of development that exceeds the London Plan guidelines are properly considered as part of the planning process. Policy D.DH7 refers to guidelines set out in the London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.
1143156	Hondo Enterprises	Hondo Enterprises	LP766	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	N/A			The acknowledgement that developments can exceed the density guidelines set in the London Plan, subject to demonstrating that the cumulative impacts of the development have been considered and do not result in over-development, or that suitable mitigation is provided through design, is supported. The London Plan seeks to optimise residential and non-residential outputs in Opportunity Areas. The Mayor's Housing SPG further states that Opportunity Areas should positively explore the potential for increased densities beyond those set in the London Plan. Therefore, the London Plan imposes no ceiling on density, indeed, for Opportunity Areas it positively encourages exploration of whether its indicative ranges can be exceeded. Policy D.DH7 does not explicitly reference Opportunity Areas; to be consistent with regional policy this policy should refer to the acceptability of sites within Opportunity Areas to exceed the density guidelines in the London Plan.				Comments are noted. The policy is consistent with the current London Plan.

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624580	Jason Larkin	Canary Wharf Group Plc	LP512	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	No	Justified			As per our comments on the Regulation 18 consultation, the London Plan and Mayor's 'Housing SPG' (2016) provide detailed guidance for considering the density of developments. A further Local Plan density policy is unnecessary repetition and it should therefore be deleted.			Comment is noted. However, policy D.DH7 provides guidance on where developments which are proposed that are in excess of the London Plan sustainable residential quality thresholds. This includes additional criteria on design and infrastructure provision that will be required to mitigate the impact of very dense developments.
1054252	Londone wcastle	Londone wcastle	LP620	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	No	Positively prepared			The acknowledgement that developments can exceed the density guidelines set in the London Plan, subject to demonstrating that the cumulative impacts of the development have been considered and do not result in over-development, or that suitable mitigation is provided through design, is supported. The London Plan seeks to optimise residential and non-residential outputs in Opportunity Areas. The Mayor's Housing SPG further states that Opportunity Areas should positively explore the potential for increased densities beyond those set in the London Plan. Therefore, the London Plan imposes no ceiling on density, instead, for Opportunity Areas it positively encourages exploration of whether its indicative ranges can be exceeded. Policy D.DH7 does not explicitly reference Opportunity Areas; to be consistent with regional policy this policy should refer to the acceptability of sites within Opportunity Areas to exceed the density guidelines in the London Plan. As a result, we do not believe the draft plan to be positively prepared.			Support for the policy is welcomed. Policy D.DH7 refers to guidelines set out in the London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.
1143389	Sainsbury's Supermarket Limited		LP908	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	No	Justified			Policy D.DH7: Density Policy D.DH7 seeks to manage higher density development. The supporting text at paragraphs 3.78 and 3.79 reflects the position within the London Plan and Housing SPG (2016) that where the upper range of the density matrix is exceeded, justification should be provided in terms of high accessibility levels and exemplary design. The policy itself does not reflect this and instead requires that development does not result in over-development and does not offer flexibility for providing justification for exceeding the top of the density range. The policy should be reviewed and amended accordingly.			Policy D.DH7 is consistent with the current London Plan and seeks to ensure that the cumulative impacts of high density developments are considered as part of the planning process, where they will exceed the London Plan density range. An amendment is proposed to paragraph 3.78 to further explain what is meant by over-development and how it may need to be addressed by developers: For instance, this may be where a development necessitates a change in the management of existing infrastructure, or where it requires substantial capital investment to address additional demand created by the development.

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1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP887	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	N/A			Policy D.DH7 requires that residential development is consistent with the guidelines set out in the London Plan. As you are aware, the London Plan is currently being reviewed and is likely to remove the Density Matrix and therefore prescriptive development quantum based on location. We consider that as presently drafted, Policy D.DH7 does not provide the flexibility for variance to quantum of development as described within the London Plan (2016) and Affordable Housing SPG (2016). The London Plan states that proposals within Opportunity Areas should optimise residential output and densities and thus contribute towards meeting and, where appropriate, exceeding the minimum guidelines for new housing (Policy 2.13). The Mayor of London's Housing SPG (2016) identifies that there is scope for higher density development beyond the matrix set out in the London Plan in particular circumstances. It is essential that such development is built to a high standard and enhances both the public and the private realm and is based on local circumstances. The Housing SPG also provides additional guidance on calculating residential density and in reference to the London Plan density matrix notes that this is '...only one part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes.' The Housing SPG states that for the purposes of the London Plan, 'optimisation' can be defined as 'developing land to the fullest amount consistent with all relevant planning objectives'. The SPG states further that 'It is essential, when coming to a view on the appropriate density for a development, that proper weight is given to the range of relevant qualitative concerns ...' (Paragraph 1.3.9) and that 'Conversely, greater weight should not be given to local context over location or public transport accessibility unless this can				<p>Policy D.DH7 is consistent with the current London Plan and seeks to ensure that the cumulative impacts of high density developments are considered as part of the planning process. The supporting text to D.DH7 makes a number of references to the density matrix contained in the current London Plan. For clarity, and to allow for possible changes to the London Plan, amendments are proposed to the following paragraphs:</p> <p>3.77: In order to manage this, the policy requires that developments in excess of the London Plan density guidelines should consider the cumulative effects from development...</p> <p>3.79: Where the London Plan density ranges guidelines are exceeded, schemes must be of exemplary design quality and must address the issues-cumulative impacts that can be associated with high density development, such as noise, disturbance, highways implications, loss of outlook and overlooking. In addition, developers should consider the capacity of infrastructure and services to accommodate the development including potential mitigation measures to provide additional capacity and unlock any identified constraints.</p> <p>3.80: Developers are expected to include reference in their planning application the relevant London Plan density range guidance for their site and the actual net residential density proposed.</p> <p>Policy S.TR1 expects development to be focused within areas with high levels of public transport accessibility and/or town centres. It is not considered necessary to repeat this in policy D.DH7</p>

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								<p>be clearly and robustly justified. It usually results in densities which do not reflect scope for more sustainable forms of development which take best advantage of good public transport accessibility in a particular location.' (Paragraph 1.3.10). Paragraph 1.3.50 of the Housing SPG states that 'meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with good public transport access. Consequently, the London Plan recognises the particular scope for higher density residential and mixed use development in town centres, opportunity areas and intensification areas, surplus industrial land and other large sites.'. With specific relevance to the Site, the Housing SPG states that 'Densities in opportunity areas and on other large sites may exceed the relevant density ranges in Table 3.2 of the London Plan'. Policy D.DH7 does set out the requirements for development which exceeds the guidelines of the London Plan. However, this list is not exhaustive and the first bullet point does not provide clarity as the how over-development is defined, nor gives a radius from the site for which cumulatives should be assessed. In addition, Policy D.DH7 should refer to increased densities adjacent to transport interchanges. The 'Consultation on proposed change to national planning policy' indicates that the Government is seeking to encourage high density developments around the commuter stations where feasible.</p>				

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP921	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density				<p>Policy D.DH7: Density. The acknowledgement that developments can exceed the density guidelines set in the London Plan, subject to demonstrating that the cumulative impacts of the development have been considered and do not result in over-development, or that suitable mitigation is provided through design, is supported.</p> <p>The London Plan seeks to optimise residential and non-residential outputs in Opportunity Areas. The Mayor's Housing SPG further states that Opportunity Areas should positively explore the potential for increased densities beyond those set in the London Plan. Therefore, the London Plan imposes no ceiling on density, indeed, for Opportunity Areas it positively encourages exploration of whether its indicative ranges can be exceeded.</p> <p>However, Policy D.DH7 does not explicitly reference Opportunity areas; to be consistent with regional policy this policy should refer to the acceptability of sites within Opportunity Areas to exceed the density guidelines in the London Plan. This policy should therefore be amended as below:</p> <p>"Residential development should have regard to be consistent with the guidelines set out in the London Plan. Higher density development that exceeds these guidelines may be appropriate, such as within sites in Opportunity Areas. Where higher density development is proposed, it must demonstrate that:</p> <ol style="list-style-type: none"> the cumulative impacts of the proposed development have been considered and do not result in over-development or that suitable mitigation measures in relation to design and infrastructure have been identified; and the site does not compromise the development potential of neighbouring sites. 			Support for the policy is welcomed. Policy D.DH7 refers to guidelines set out in the London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.	

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1142035		Hermes Property Unit Trust	LP155	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	Yes			Policy D.DH7: Density We generally support that densities should be in line with those in the London Plan. However, we understand that the new London Plan (to be published for consultation late November 2017) advocates a slightly different approach to density. Moreover, consideration of site constraints and viability should also form an important consideration, especially where some sites can accommodate higher densities whilst not overly impacting on adjacent character.		Yes		Viability considerations and site constraints will not over-ride the delivery of exceptional design in high density developments. The viability of developments will be considered on a case-by-case basis as part of the development management process and with regard to the Development Viability SPD.
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP896	PART 3: POLICIES, 3.76 Paragraph Policy D.DH7: Density	No				Policy D.DH7: Density The acknowledgement that developments can exceed the density guidelines set in the London Plan, subject to demonstrating that the cumulative impacts of the development have been considered and do not result in over-development, or that suitable mitigation is provided through design, is supported. The London Plan seeks to optimise residential and non-residential outputs in Opportunity Areas. The Mayor's Housing SPG further states that Opportunity Areas should positively explore the potential for increased densities beyond those set in the London Plan. Therefore, the London Plan imposes no ceiling on density. Indeed, for Opportunity Areas it positively encourages exploration of whether its indicative ranges can be exceeded. Policy D.DH7 does not explicitly reference Opportunity Areas; to be consistent with regional policy, policy.DH7 should refer to the acceptability of sites within Opportunity Areas to exceed the density guidelines in the London Plan.			Support for the policy is welcomed. Policy D.DH7 refers to guidelines set out in the London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.
719346	John Turner	Ballymore Group	LP272	PART 3: POLICIES, 3.79 Paragraph	No				Policy D.DH7 – Density We support policy D.DH7 within the context of delivering the needed new housing within LB Tower Hamlets and Greater London. As the Council acknowledge within supporting text paragraph 3.76 the GLA's density matrix is designed as a guidelines tool and therefore should not be interpreted as a stringent test for the acceptability of development. The acknowledgment that densities can exceed the GLA's recommended density range subject to exceptional design, plan making and impact on the surrounding area is therefore fully welcomed. Policy D.DH7 does not explicitly reference Opportunity Areas; to be consistent with regional policy this policy should refer to the acceptability of sites within Opportunity Areas to exceed the density guidelines in the London Plan. The Policy should also reference the desire at a London Wide Level to encourage the majority of new development within the Borough towards Opportunity Areas and highly accessible locations We also support the Councils decision to amend policy D.DH7 to remove reference to unit's	Yes		Support for the policy is welcomed. Policy D.DH7 refers to guidelines set out in the London Plan, which includes specific guidance relating to higher densities being appropriate in opportunity areas and highly accessible locations. It is not necessary to make an additional reference to opportunity areas as this policy seeks to ensure the cumulative impacts of any development are properly considered whenever densities are proposed that will exceed the London Plan guidelines.

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									sizes. This requirement while important was not directly applicable to D.DH7 and is more appropriately covered elsewhere within the Plan.			
1142493		Berkeley Group	LP401	PART 3: POLICIES, 3.79 Paragraph	No				D.DH7: Density Density should be design led and each proposal assessed on its own merits. Cumulative impacts of development should in large part be mitigated by CIL, this is not an appropriate test for 'density' Soundness test: Revise to make deliverable and therefore effective. Potentially inconsistent with Regulations 122 and 123 of the CIL Regulations (2010 as amended)	Yes		Policy D.DH7 is consistent with the current London Plan. The plan should be read as a whole in relation to how the cumulative impacts of high density developments can be mitigated through planned improvements to existing infrastructure, which includes CIL. The policy also makes reference to the importance of exemplary design quality in high density developments.
1143156	Hondo Enterprises	Hondo Enterprises	LP767	PART 3: POLICIES, 3.82 Paragraph Policy D.DH8: Amenity	N/A			The principle of Policy D.DH8, which seeks to ensure existing and future residents are able to enjoy good levels of amenity, is supported. It is requested that the wording of Part (b) and (c) of this policy are altered to acknowledge that new and existing habitable rooms should have an acceptable outlook and adequate levels of daylight and sunlight, wherever possible. At present there is no flexibility within this policy as required by the Housing Supplementary Planning Guidance issued by the Mayor of London in March 2016, which states that: "An appropriate degree of flexibility needs to be applied when using the BRE Guidelines to assess the daylight and sunlight impacts of a new development on surrounding properties. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets" For Policy D.DH8 to be consistent with the Mayor's guidance and deliverable, greater flexibility in the application of this policy is needed to acknowledge that consideration must be given to the local context.			The supporting text refers to a sunlight and daylight assessment to allow effects on daylight and sunlight levels to be considered as part of planning applications when they are submitted. The wording of the policy is considered to be loose enough to allow application of the guidance in the Housing SPG (GLA, 2016)	

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP922	PART 3: POLICIES, 3.82 Paragraph Policy D.DH8: Amenity	N/A			The principle of Policy D.DH8, which seeks to ensure existing and future residents are able to enjoy good levels of amenity, is supported. It is requested that the wording of Part (b), (c) and (d) of this policy are amended to acknowledge that new and existing habitable rooms should have an acceptable outlook and adequate levels of daylight and sunlight, wherever possible. At present there is no flexibility within this policy as required by the Housing Supplementary Planning Guidance issued by the Mayor of London in March 2016, which states that:"An appropriate degree of flexibility needs to be applied when using the ERE Guidelines to assess the daylight and sunlight impacts of a new development on surrounding properties. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where ERE advice suggests considering the use of alternative targets" For Policy D.DH8 to be consistent with regional policy and deliverable, greater flexibility in this policy is needed to acknowledge that consideration must be given to the local context. The policy should therefore be revised as set out below:"Development is required to protect and where possible enhance or increase the extent of the amenity of new and existing buildings and their occupants, as well as the amenity of the surrounding public realm. To achieve this, development must: a. maintain good levels of privacy and avoiding an unreasonable level of overlooking or unacceptable increase in the sense of enclosure; b. ensure new and existing habitable rooms have an acceptable outlook, wherever possible with regard to the local context; c. ensure adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development wherever possible with regard to the site context; d not				The supporting text refers to a sunlight and daylight assessment to allow effects on daylight and sunlight levels to be considered as part of planning applications when they are submitted. The wording of the policy is considered to be loose enough to allow application of the guidance in the Housing SPG (GLA, 2016).

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								result in an unacceptable material deterioration of the sunlight and daylight conditions of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space, where possible with regard to the local context; and e. not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development. "				
1142035		Hermes Property Unit Trust	LP156	PART 3: POLICIES, 3.82 Paragraph Policy D.DH8: Amenity	Yes			Policy D.DH8: Amenity The requirements of the policy reflect the standards and requirements as set out in the existing London Plan. However, as highlighted above, the new London Plan is to be released for public consultation in late November 2017. In addition, the policy should make reference to the requirement for supporting assessments to accompany applications in terms of sunlight, daylight, overlooking and overshadowing.		Yes		The supporting text makes reference to sunlight and daylight assessments to be submitted with planning applications where appropriate. Paragraphs 3.84-3.87 outline how overlooking and overshadowing will be assessed as part of the development management process.
1033284	Unknown	One Housing Group	LP395	PART 3: POLICIES, 3.82 Paragraph Policy D.DH8: Amenity	Yes		One Housing welcomes Policy D.DH8 and the requirement for development to protect and where possible enhance local amenity, including adequate levels of daylight and sunlight. One Housing also supports the requirement for estate regeneration development schemes to protect and enhance existing open space and community facilities (Policy D.H2, Part 5).			Yes		Support for the policy is welcomed.

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1142035		Hermes Property Unit Trust	LP157	PART 3: POLICIES, 3.93 Paragraph Policy D.DH9: Shopfronts	Yes			Policy D.DH9: Shopfronts We consider that this policy is overly prescriptive and unreasonable, especially in respect of criteria a. If such a policy is required, some guidance as to how a commercial enterprise should maintain active frontages at all times, including a definition of active frontage would be helpful.		Yes		Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated. For clarity the following amendment to paragraph 3.80 is proposed: Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated to maintain active frontages at all times.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP664	PART 3: POLICIES, Chapter 4: Meeting housing needs	No				articular observation on Density, Housing targets and the IoD: AGFA is particularly interested in the density and housing targets that will inevitably effect the AGFA area significantly: According to the Local Plan, The Isle of Dogs and South Poplar (IOD&SP) is the main priority area to deliver housing targets in Tower Hamlets. The boroughs' housing target in the current London Plan 2015-25 is 39,314 or an average of 3,931 per year, the highest in London, although targets in the draft new London Plan 2017 have recently been reduced slightly to 35,110, or 3,511 per year. In Tower Hamlets draft Local Plan on page 62 the minimum target for new units for the IOD&SP from 2016-31 is 30,601. The Borough total is 54,455. The Isle of Dogs and South Poplar areas' 30,601 target is broken down by planning status, including the following categories: 1. Completed: 1,645 2. Under development: 12,846 3. Prior approval: 119 4. Full planning permission: 4,831 5. Allocations without permission: 9,561 6. SHLAA without permission: 836 7. Borough-wide windfall allowance: 753 In the original draft of Tower Hamlets' Local Plan 2031, three out of four of One Housing Group's Island social housing estates were earmarked as 'regeneration opportunities' with no explanation. After objections this designation has been withdrawn in the revised Local Plan, but the same estates are included in Figure 10: Housing distribution across 24 places as an area of 'Very High growth.' (Page 48) and the numbers associated with the redevelopment of the same estates and the maps on page 65 include the estates. It states on page 65 that: The majority of the housing growth within the borough will be provided in the following locations in the Isle of Dogs and South Poplar sub-area: which includes, Canary Wharf, Blackwall, Leamouth and northern parts of Millwall and Cubitt Town. Three of the four estates are included in the northern parts of Millwall and Cubitt Town, given that they are no longer "regeneration areas", they should be excluded from the housing growth areas as it is not clear where it is assumed that any additional new units could be built. On this basis we believe that the plan is unsound. As part of this unsoundness there is no explanation in the plan on whether: • 'allocations without permission' only refers	No		The housing delivery figures provided in the plan do not assume or require the redevelopment of the 4 estates. The boundaries of growth areas in figure 10 are ward boundaries, as that the smallest spatial scale we can disaggregate future growth down to. The boundaries cannot be changed. Figure 10 is simply a visual and spatial representation of the existing housing trajectory. In order to clarify the role of figure 10, we propose inserting the following additional information footnote 18: Please note: figure 10 is a spatial representation of the Local Plan housing supply outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available the distribution of growth is based around ward boundaries and is therefore indicative. The assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation/heritage restrictions. In summary, the locations of growth represent our understanding of where growth is coming forward in the borough based on the supply of land. Each development scheme will still have to accord with the policies in the plan and be judged on its own merits. The high growth expectation for Canary Wharf and Blackwall wards are primarily as a result of existing schemes under development and site allocations identified in the plan. These are referred to as allocations (without permission) in appendix 7. For the whole of the Isle of Dogs and South Poplar sub-area over 15 years, only 850 homes are anticipated to come forward not in already permitted or allocated sites. Yes, to clarify, allocations without permission only refer to site

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									to the several site allocations in the plan • 'SHLAA without permission' and 'Borough-wide windfall allowance' assume any units from the demolition and redevelopment of the Barkantine, Kingsbridge, Samuda and St Johns Estates or detailing other vacant/non-residential sites that could deliver the target number of units. Further evidence that the Local Plan is unsound, is that the Local Plan targets should not assume new units/higher densities from estate demolitions before the required 'meaningful consultation' has been demonstrated - because it places undue pressure on future planning committees when at the time the Local Plan was published - now - it can't be known whether any proposals have met key criteria. Possible contradictions with 1985 Housing Act consultation duty; LBTH statement of community involvement, (thorough and inclusive consultations), and guidance on estate regeneration which recognizes the importance of resident support/engagement. The case could be made that Local Plans should not in any way prejudge the outcome of resident regeneration consultation, and expecting increased densities or new units from estate demolitions is an invalid 'material consideration' for planning committees unless and until other planning standards and guidance on regeneration has been met. This can also be seen as the "Local Plan" not "Legally Sound" either and therefore, besides omitting all references to "Regeneration" the maps on page 65 should be omitted against the councils own previous withdrawal in the revised Local Plan On Page 65 the sites of the Barkantine, St Johns and Samuda Estates should be excluded from the housing growth areas of North Millwall and North Cubitt Town by moving the boundary North West in Millwall to Byng Street and North East in the immediate North of St Johns Estate			allocations in the plan, which don't yet have planning permission.
1142493		Berkeley Group	LP334	PART 3: POLICIES, Chapter 4: Meeting housing needs	No	Justified; Effective; Consistent with national policy			Justified: No, SHMA evidence on Housing Mix is limited Effective: No, in relation to clarity of housing target and relationship to strategic policy. Lack of flexibility over private housing mix Consistent with national policy: No, in relation to S73 applications and 'related' developments Tower Hamlets has been successful in delivering large numbers of new homes in recent years and Berkeley Group welcomes the Council's intention to continue to seek to meet its London Plan targets. It notes that these targets may be extended further and that Plan policies need to anticipate the need to increase delivery on both allocated and non-allocated sites given the current deficit in the housing trajectory. The general policy thrust in Policy S.H1 (1) is supported. Berkeley Group request clarity on part (2) of the policy. This requires a target of 50% affordable housing overall (a) and a minimum provision of 35% affordable on sites, 'subject to viability'. The Policy as currently drafted is	Yes		Support for general approach in S.H1 is welcomed. Policy D.SG5 (one of the linked policies for S.H1) requires developments to fulfil developer contributions requirements in line with the Tower Hamlets Planning Obligations SPD and Development Viability SPD. The Development Viability SPD acknowledges that the borough will have regard to the threshold approach set up by the GLA. This is also described in section 4.18 of the supporting text, which makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified by through adding wording to this paragraph ...Applications that do not meet policy requirements will be subject to viability re-

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								<p>unclear as to whether the requirement for viability assessment in policy DSG.5 is engaged at the 35% or 50% target. As noted above the Mayor of London has adopted a 'Threshold' approach to viability. It is currently unclear how (if at all) Tower Hamlets' draft policies relate to this approach, which clearly raises significant concerns about the effectiveness of the Local Plan in combination with strategic London policies. Part four of that Guidance sets out the Mayor of London's support for Build to Rent. Although the supporting text (para 4.21) refers to part 2(d) as supporting 'Build to rent' this isn't referred to explicitly in the policy, which currently refers only to self-build. Policy D.H2 refers to affordable housing. Part 2(b) identifies the exceptional circumstances where off site affordable housing might be allowed. The Council could consider adding 'amendments to planning permissions' where off site contributions might be the most effective way of delivering additional affordable homes. Part 2 (D) of the policy refers to developments where an application is amended. This suggests that any affordable housing calculation will relate to the 'whole development'. Such an approach, whether applied to Section 73 applications or with applications on adjacent sites or 'drop in' applications for parts of sites is not consistent with the NPPF and Planning Practice Guidance (PPG) on viability. Any existing permission sets the basis for a 'Competitive Return' and 'Incentive for the Landowner' to bring a site forward for development, as required in paragraph 173 of the NPPF and elaborated on in para 24 of PPG on viability (10- 024-20140306). Part 3 of the policy covers 'Housing Mix'. This appears to be based on the proposed mix in the most recent Tower Hamlets Strategic Housing Market Assessment (2017). This SHMA adopts a very different approach to the previous two SHMAs undertaken by the Council in 2009 and in 2014 which informed the currently adopted plan (Managing Development DPD) and the previous Regulation 18 draft of the new Local Plan. NOTE: Please refer to letter for tables showing referenced SHMA figures. This shows that whilst the affordable rent mix has remained largely consistent, with some variation around one and two bed homes, there have been very significant changes to the market and intermediate mix. These changes are not due to underlying changes in housing need but almost entirely to the methodology adopted, with the 2015 SHMA being based on the GLA's 2013 London SHMA methodology and the new SHMA being based on what its authors describe as a 'National Methodology'. The section dealing with housing mix in the new SHMA is very short and does not make clear its assumptions and does not appear to deal with issues such as market demand or the deliverability of the market or</p>			<p>appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document. The SPD will be added to the evidence links for policy S.H1.</p> <p>Policy S.SG.1 provides the spatial direction for the plan and makes it clear we will support delivery of growth in highly accessible areas. We will insert a more explicit link to this in the supporting text (paragraph 4.14):</p> <p>Housing growth will be primarily delivered in the locations specified in part 1 (a) via a number of different mechanisms: the regeneration of previously developed land, intensification of the built form in opportunity areas, highly accessible locations along transport corridors, and the delivery of site allocations. A smaller proportion of housing will be delivered through town centre intensification, estate regeneration and infill development, bringing back long term vacant properties into residential use and windfall sites. Further details can be found in sections 4 and 5.</p> <p>There is a numbering error in the supporting text. This will be rectified:</p> <p>4.21 Part 2 (c d) seeks ... 4.22 Part 2 (d e) demonstrates ...</p> <p>It is not considered that this change is necessary. Supporting text (paragraph 4.35) makes it clear that the approach to amendments to planning permissions will depend on the number of units and will require section 73 developments to follow the same affordable housing and viability procedure as a new planning permission. In the certain circumstances and where the criteria outlined in policy D.H2 (2b) are met, off site contributions may be acceptable.</p> <p>It is not considered that this approach is contrary to the NPPF or NPPG or therefore that this change is necessary. Supporting text (paragraph 4.35) makes it clear that the approach to amendments to planning permissions will depend on the number of units and will require section 73 developments to follow the same AH and viability procedure as a new planning</p>

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									<p>intermediate mixes. However it has been translated directly into a plan requirement. In the past this may not have mattered as such issues were often negotiated for strategic sites based on site specific issues, but the 'Threshold Approach' of the London Mayor and the requirement to meet the tenure split and other obligations and requirements as well as the affordable housing target means that an application could be forced into the 'Viability Tested Route' on the basis of the policy on market or intermediate housing mix which does not appear to be properly evidenced or justified. Unnecessary restrictions on market housing mix can also mean that developers are unable to maximise the value of the private dwellings in their developments, making it more difficult to support the provision of affordable homes. The previous draft of the Plan did not include a mix for private dwellings and the Berkeley Group supported that approach, because such a mix should be determined by the developer responding to demand. If the plan is to include a mix it is the view of Berkeley Group that it should be expressed as a range and be subject to site specific circumstances and market conditions. For intermediate housing mix it is suggested that the Council may wish to consult registered providers to ensure that they regard it as deliverable. It is Berkeley's experience that in many cases they are unable to sell or let larger intermediate homes and prefer smaller ones. Policy (SH1.5) also includes reference to sales to Londoners, preferably owner occupiers. Berkeley Group has a commitment to market all new homes first in the UK, but is of the view that 'Sales to Londoners' as a policy is neither appropriate nor deliverable or enforceable.</p> <p>Modifications to make sound Clarify relationship with strategic policy and Mayor of London's Housing SPG, which is to be incorporated into future London Plan policy Refer explicitly to Build to Rent in Policy SH1(2) Remove reference to Sales to Londoners, 'preferably owner occupiers' in Policy S.H1(5) Add 'amending planning permissions' to circumstances where off site contributions might be considered in Policy 2.b Remove Policy DH2(d) Remove 'Market' mix in Policy D.H2(3) or allow flexibility between 1 and 2 bed dwellings Introduce flexibility in the wording relating to housing mix allowing it to be considered flexibly in the context of new SHMAs and housing market assessments during the plan period.</p>			<p>permission. This includes the ability to provide a viability assessment which can address any viability constraints.</p> <p>The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs. We will seek to explore further the relationship between the housing mix requirement and the viability threshold approach in the examination.</p> <p>This policy is considered appropriate and deliverable. Supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas.</p>

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1142365		Newport Holdings Ltd	LP222	PART 3: POLICIES, Chapter 4: Meeting housing needs	Yes			Chapter 4: Meeting Housing Needs The introduction to Chapter 4 sets out that the City Fringe is required to contribute a minimum of 9,330 new homes from 2016-2031, with specific reference to delivery in Aldgate. It is noted that even with the delivery of 54,455 homes borough-wide, there will be a shortfall towards the end of the Plan period with an unmet need (the requirement under draft Policy S.H1 is to deliver 58,965 new homes by 2031). A key part of the policy approach to achieving these figures is through the delivery of the majority of new housing in the opportunity areas and site allocations. Para. 4.14 notes that the mechanisms applied to achieve housing development in these locations include the regeneration of previously identified land, the intensification of built form in opportunity areas and the delivery of site allocations. This approach is supported, particularly the reference to the opportunities areas, including the City Fringe, and specifically the Aldgate area which has an important role to play in meeting the Borough's housing needs.		Yes		Support for approach welcomed

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635797	Greater London Authority		LP672	PART 3: POLICIES, Chapter 4: Meeting housing needs	Yes		The London Plan sets an annual average housing supply monitoring target for Tower Hamlets of 3,931 per annum. This is the largest for the London boroughs. Whilst the figure exceeds the local need identified by Tower Hamlets' SHMA, Tower Hamlets is expected to contribute to meeting strategic housing demand, in line with the London SHLAA 2013 and London Plan Policy 3.3. Tower Hamlets has committed to delivering at least 3,931 homes a year, 58,965 homes over the lifetime of the Local Plan. The borough has identified sufficient capacity to meet its London Plan housing target over the first 10 years of the Local Plan period. The borough has stated additional capacity is likely to come forward so that it can meet its housing target in the latter (11-15 years) period. It has identified that additional capacity is likely to come from the higher than average density levels and delivery rates achieved in Tower					The GLA's endorsement of the housing trajectory is welcomed. Chapter 6 commits LBTH to regular monitoring and review of the plan.

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							Hamlets, the emergence of new delivery mechanisms and other interventions such as the brownfield register. These assumptions are supported by the London and Tower Hamlets' AMRs which demonstrate that the borough has the highest housing delivery rate for all the London boroughs. In this regard, in addition to working on the Isle of Dogs and South Poplar OAPF mentioned above, Tower Hamlets has been in putting into the new London SHLAA. Tower Hamlets' revised housing supply target will be published in the new draft London Plan later this year, based on this process. Given these factors, in this instance, subject to a review of the Local Plan within 10 years of its adoption, the proposed housing trajectory is acceptable.					
1033272	James Stevens	Home Builders Federation Ltd	LP803	PART 3: POLICIES, 4.1 Paragraph	N/A			We are very concerned that no SHLAA is available to support the Regulation 19 consultation which details the sites that the Council will rely upon to deliver the housing requirement. We note that the Council appears to rely on the GLA SHLAA (paragraph 2.3 of the Housing Delivery Strategy). At the time of writing this has not yet published. I				It was not considered necessary for the Strategic Housing Land Availability Assessment (SHLAA) to be published alongside our consultation as the housing trajectory is primarily based on publically available sites (permitted sites and site allocations). This is outlined in the Five-Year Housing Land Supply and Housing Trajectory Statement: position at August 2017. The SHLAA sites used the GLA SHLAA

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								<p>checked with the GLA on the 6 November 2017. Without this information it is hard for third parties to judge whether the housing objectives in the Council's Local Plan are deliverable, meeting the requirements of paragraph 47 of the NPPF. At the moment, we have to take the Council's statement that it has a land supply for the first ten years at face value. Scrutiny of the land supply may prompt questions about this but this depends on the release of the GLA's SHLAA. An example of one of the problems we have is with the Mayor's new and more restrictive policy approach to the release of industrial land for residential development (such as Strategic Industrial Land - SIL). The Tower Hamlet's Local Plan signals such an approach in Policy D.EMP3. This could reduce the amount of land available to justify the current London Plan target of 3,931dpa because this target was predicated upon the release of some SIL and other industrial sites for residential development. Hence there is a conflict between current London Plan policy and the GLA's 2013 SHLAA and Housing Capacity Study which provided the basis for the borough housing targets, and the new more restrictive approach signalled by emerging policy. Nevertheless, as things stand, the Council is unable to demonstrate that it can deliver the housing requirement in full. Table 4 on page 12 of the Housing Delivery Strategy sets out the position. A solution would be to have a ten year plan. The Council is able to demonstrate a ten year land supply. The Council could then produce a new plan that reflects the new requirement in the new London Plan, once this is adopted. Or, the Council could express the local plan housing requirement as a land capacity constrained figure of 3,630dpa – i.e. housing land capacity for 54,455 homes divided by the 15 years of the plan. This would increase the undersupply against the London Plan</p>				<p>methodology (which is the same as in 2013) and uses the assessment of overall capacity on potential sites to provide an aggregate, probability based estimate of the future contribution from this source at a local planning authority level, not as an indication of the capacity of individual potential sites. Consequently, the release of detailed information on these sites could lead to this data being misunderstood and misapplied. Therefore, information on individual 'potential' sites is confidential and is not made publicly available. Therefore, the publication of the GLA SHLAA does not provide any further detail. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.</p>

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							target by an additional 355dpa a year (5,320 divided by 15).				
1033272	James Stevens	Home Builders Federation Ltd	LP802	PART 3: POLICIES, 4.1 Paragraph	N/A		<p>We have considered the Council's SHMA (report of May 2017). We are broadly supportive of the Council's assessment of need. We accept the use of the Mayor's Central Variant for the demographic projection. This reflects the London Plan (see for example paragraph 1.10C of the London Plan). This is the Mayor's alternative migration assumption. The HBF is unconvinced by the efficacy of this adjustment to the official projections as we argued at the London Plan examination. Migration needs to be treated consistently across the country and therefore the official demographic projections should not be adjusted. It is notable that the Government's proposed new standard method does not adjust the projections but establishes a new national benchmark based on a trend of ten years. The Central Variant makes a big difference to the OAN for London. The GLA's SHMA 2013 – the study that informed the London Plan – showed that the Central Variant results in a demographic starting point for the whole of London of 39,500 households per year (paragraph 3.60), compared to the 2011-interim household projections which suggested that 52,000 households per year might form (see paragraph 3.69). Clearly this is a very large disparity. It remains the HBF's view today that alternative migration trends should not be used by London, because to become true, it requires local authorities outside of London to compensate for this by planning for greater population and housing growth in their own areas. To put it simply, the Mayor's migration assumptions will only come to pass if local authorities outside of London plan for more homes. They are resolutely refusing to do this – i.e. to lift supply above their own demographic trend projections to compensate for more inward migration from London (as well as</p>			We welcome acknowledgement of soundness of the borough's Strategic Housing Market Assessment.	

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								<p>decreased out-migration) because they do not support the Mayor's alternative view on migration precisely because of the implications that has for the number of homes they have to plan for. Nor are they planning to accommodate the London shortfall, mainly because the GLA has not raised with them the issue of the shortfall – a problem with cross boundary strategic planning that relates back to our concern about the inadequacy of the current operation of the duty to cooperate in London. However, this is an issue for the Mayor and the authorities in the wider south east to resolve. So long as they ignore the implications of the Mayor's demographic assumptions then they will be confronted with much higher levels of inward migration and housing need in their own areas. The losers will be those in lower incomes priced out by relatively more affluent incomers. We support the adjustment of 20% for market signals, although this may be on the low side given the considerable affordability problems in the borough (the lower quartile measure is 11.1 according to figure 43 of the SHMA). The Government's proposed standard method indicates that Tower Hamlets would need to plan on the basis of 4,873dpa, although this figure does not reflect the Mayor of London's alternative migration assumptions that have a big effect on the demographic starting point. The SHMA considers that the annual OAN for Tower Hamlets, is 3,097 – rounded up to 3,100. This does not seem unreasonable albeit we have grave doubts about the efficacy of the Mayor's Central Variant.</p>				

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624580	Jason Larkin	Canary Wharf Group Plc	LP513	PART 3: POLICIES, 4.1 Paragraph	No	Positively prepared			We are encouraged that para. 4.1 states that the chapter sets out policies to maximise the supply of housing in the borough. We also note that the majority (56%) of the minimum number of new homes are identified for the Isle of Dogs & South Poplar sub area (Table 1). Reference is made in para. 4.8 to a shortfall towards the end of the plan period but that the Council is committed to maximising housing supply to address this unmet need. We would however note that the unnecessary height restrictions that the Council is seeking to introduce in the TBZs as described above would only help to constrain development capacity which would have an adverse impact on housing delivery.			Support for approach noted. We consider that Tall Building Zones will not limit the borough's ability to deliver required housing numbers; this approach simply provides better guidance and certainty to developers and ensures a design centred approach to the delivery of tall buildings. Response also provided to these comments in relation to policy D.DH6.
1033272	James Stevens	Home Builders Federation Ltd	LP801	PART 3: POLICIES, 4.2 Paragraph	No	Effective			If the new London Plan is found sound it is likely that Tower Hamlets will have a lower strategic housing target as some of the emphasis shifts to elsewhere in London. However, so long as the London Plan is part of the development plan for London, we have to proceed on the basis on what the current London Plan expects. This requires Tower Hamlets to plan for 3,931dpa, and to roll this target forwards where local plans extend beyond the current London Plan. Moreover, as discussed above, the London Plan sets out the need for 49,000dpa for the period 2015-2036 and a higher need for 62,000dpa for the period 2015-2026 if the backlog and need is that has accumulated from 2011 to 2015 is to be addressed. If the new London Plan is adopted, then Tower Hamlets can review its local plan to reflect the new lower target. In the meantime the plan may not be sound because it is unable to meet the full housing need over the plan period.			We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.

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1142097	Michael Tyrrell	4 Estates Forum	LP38	PART 3: POLICIES, 4.5 Paragraph	No	Justified			<p>The Isle of Dogs and South Poplar (IOD&SP) is the main priority area to deliver housing targets in Tower Hamlets. The boroughs' housing target in the current London Plan 2015-25 is 39,314 or an average of 3,931 per year, the highest in London, although targets in the draft new London Plan 2017 have recently been reduced slightly to 35,110, or 3,511 per year. In Tower Hamlets draft Local Plan on page 62 the minimum target for new units for the IOD&SP from 2016-31 is 30,601, out of a Borough total of 54,455. In appendix 7: Housing Trajectory, the Isle of Dogs and South Poplar areas' target is broken down by planning status, including the following categories: 1. Completed: 1,645 2. Under development: 12,846 3. Prior approval: 119 4. Full planning permission: 4,831 5. Allocations without permission: 9,561 6. SHLAA without permission: 836 7. Borough-wide windfall allowance: 753 In the original draft of Tower Hamlets' Local Plan 2031, three out of four of One Housing Group's Island social housing estates were earmarked as 'regeneration opportunities' with no explanation. After objections this designation has been withdrawn in the revised Local Plan, but the same estates are included in Figure 10: Housing distribution across 24 places as an area of 'Very High growth.' (Page 48) and the numbers associated with the redevelopment of the same estates and the maps on page 65 include the estates. It states on page 65 that: The majority of the housing growth within the borough will be provided in the following locations in the Isle of Dogs and South Poplar sub-area: which includes, Canary Wharf, Blackwall, Leamouth and northern parts of Millwall and Cubitt Town. Three of the four estates are included in the northern parts of Millwall and Cubitt Town, given that they are no longer "regeneration areas", they should be excluded from the housing growth areas as it is not clear where it is assumed that any additional new units could be built. On this basis we believe that the plan is unsound. As part of this unsoundness there is no explanation in the plan on whether: ' allocations without permission' only refers to the several site allocations in the plan ' SHLAA without permission' and 'Borough-wide windfall allowance' assume any units from the demolition and redevelopment of the Barkantine, Kingsbridge, Samuda and St Johns Estates. Given the lack of un-allocated vacant or 'non-residential' land, the final Local Plan needs more information about where these additional units could be built without involving the demolition of our estates in whole or part. If delivering any of these units depends on redevelopment of any part of our estates, we believe the plan is unsound, on the grounds that Local Plan targets should not assume new units/higher densities from estate demolitions before the required 'meaningful consultation' has</p>	Yes		<p>The housing delivery figures provided in the plan do not assume or require the redevelopment of the four estates.</p> <p>The boundaries of growth areas in figure 10 are ward boundaries, as that the smallest spatial scale we can disaggregate future growth down to. The boundaries cannot be changed.</p> <p>Figure 10 is simply a visual and spatial representation of the existing housing trajectory. In order to clarify the role of figure 10, we propose inserting the following additional information footnote 18:</p> <p>Please note: figure 10 is a spatial representation of the Local Plan housing supply outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available the distribution of growth is based around ward boundaries and is therefore indicative.</p> <p>The assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation /heritage restrictions. In summary, the locations of growth represent our understanding of where growth is coming forward in the borough based on the supply of land. Each development scheme will still have to accord with the policies in the plan and be judged on its own merits.</p> <p>The high growth expectation for Canary Wharf and Blackwall wards are primarily as a result of existing schemes under development and site allocations identified in the plan. These are referred to as allocations (without permission) in appendix 7. For the whole of the Isle of Dogs and South Poplar sub-area over 15 years, only 850 homes are anticipated to come forward not in already permitted or allocated sites.</p> <p>Yes, to clarify, allocations without permission only refer to site allocations in the plan, which don't yet have planning permission.</p>

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								<p>been demonstrated. Such assumptions would place undue pressure on a future planning committee considering any final redevelopment proposal, because at the time the Local Plan was published – (autumn 2017) - it can't be known whether any proposals have met key criteria such as 'meaningful consultation.' At the time of writing we are still waiting for the publication of a stock condition survey, so an option appraisal process hasn't even started. As a result there are possible contradictions with 1985 Housing Act consultation duty; LBTH statement of community involvement, (thorough and inclusive consultations), and guidance on estate regeneration which recognises the importance of resident support/engagement. The case could be made that Local Plans should not in any way prejudge the outcome of resident regeneration consultation, and expecting increased densities or new units from estate demolitions is an invalid 'material consideration' for planning committees unless and until other planning standards and guidance on regeneration have been met, which they clearly can't have been yet in the case of our estates. On Page 65 the sites of the Barkantine, St Johns and Samuda Estates should be excluded from the 'very high housing growth' areas of North Millwall and North Cubitt Town by moving the boundary North West in Millwall to Byng Street and North East in the immediate North of St Johns Estate. In appendix 7: Housing Trajectory, where the housing target for the Isle of Dogs and South Poplar is broken down by planning status, it should be clarified that it is not necessary to demolish any part of any social housing estates to reach the overall target, preferably by providing some details of possible vacant/unallocated/non-residential land where the required numbers listed in 'SHLAA without permission' (836) and 'borough-wide windfall allowance' (753) could be delivered.</p>			

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1142661	Abdul Basit		LP560	PART 3: POLICIES, Table 1 Minimum number of additional homes across sub-areas (2016 - 2031)	No	Positively prepared; Justified; Consistent with national policy			Particular observation on Density, Housing targets and the IoD: CWCO is particularly interested in the density and housing targets that will inevitably effect the CWCO area significantly: According to the Local Plan, The Isle of Dogs and South Poplar (IOD&SP) is the main priority area to deliver housing targets in Tower Hamlets. The boroughs' housing target in the current London Plan 2015-25 is 39,314 or an average of 3,931 per year, the highest in London, although targets in the draft new London Plan 2017 have recently been reduced slightly to 35,110, or 3,511 per year. In Tower Hamlets draft Local Plan on page 62 the minimum target for new units for the IOD&SP from 2016-31 is 30,601. The Borough total is 54,455. The Isle of Dogs and South Poplar areas' 30,601 target is broken down by planning status, including the following categories: 1. Completed: 1,645 2. Under development: 12,846 3. Prior approval: 119 4. Full planning permission: 4,831 5. Allocations without permission: 9,561 6. SHLAA without permission: 836 7. Borough-wide windfall allowance: 753 In the original draft of Tower Hamlets' Local Plan 2031, three out of four of One Housing Group's Island social housing estates were earmarked as 'regeneration opportunities' with no explanation. After objections this designation has been withdrawn in the revised Local Plan, but the same estates are included in Figure 10: Housing distribution across 24 places as an area of 'Very High growth.' (Page 48) and the numbers associated with the redevelopment of the same estates and the maps on page 65 include the estates. It states on page 65 that: The majority of the housing growth within the borough will be provided in the following locations in the Isle of Dogs and South Poplar sub-area: which includes, Canary Wharf, Blackwall, Leamouth and northern parts of Millwall and Cubitt Town. Three of the four estates are included in the northern parts of Millwall and Cubitt Town, given that they are no longer "regeneration areas", they should be excluded from the housing growth areas as it is not clear where it is assumed that any additional new units could be built. On this basis we believe that the plan is unsound. As part of this unsoundness there is no explanation in the plan on whether: • 'allocations without permission' only refers to the several site allocations in the plan • 'SHLAA without permission' and 'Borough-wide windfall allowance' assume any units from the demolition and redevelopment of the Barkantine, Kingsbridge, Samuda and St Johns Estates or detailing other vacant/non-residential sites that could deliver the target number of units. Further evidence that the Local Plan is unsound, is that the Local Plan targets should not assume new units/higher densities from estate demolitions before the required 'meaningful consultation' has been demonstrated - because it	No	This can also be seen as the "Local Plan" not "Legally Sound" either and therefore, besides omitting all references to "Regeneration" the maps on page 65 should be omitted against the councils own previous withdrawal in the revised Local Plan	The housing delivery figures provided in the plan do not assume or require the redevelopment of the four estates. The boundaries of growth areas in figure 10 are ward boundaries, as that the smallest spatial scale we can disaggregate future growth down to. The boundaries cannot be changed. Figure 10 is simply a visual and spatial representation of the existing housing trajectory. In order to clarify the role of figure 10, we propose inserting the following additional information footnote 18: Please note: figure 10 is a spatial representation of the Local Plan housing supply outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available the distribution of growth is based around ward boundaries and is therefore indicative. The assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation/heritage restrictions. In summary, the locations of growth represent our understanding of where growth is coming forward in the borough based on the supply of land. Each development scheme will still have to accord with the policies in the plan and be judged on its own merits. The high growth expectation for Canary Wharf and Blackwall wards are primarily as a result of existing schemes under development and site allocations identified in the plan. These are referred to as allocations (without permission) in appendix 7. For the whole of the Isle of Dogs and South Poplar sub-area over 15 years, only 850 homes are anticipated to come forward not in already permitted or allocated sites. Yes, to clarify, allocations without permission only refer to site allocations in the plan, which don't yet have planning permission.

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								places undue pressure on future planning committees when at the time the Local Plan was published - now - it can't be known whether any proposals have met key criteria. Possible contradictions with 1985 Housing Act consultation duty; LBTH statement of community involvement, (thorough and inclusive consultations), and guidance on estate regeneration which recognizes the importance of resident support/engagement. The case could be made that Local Plans should not in any way prejudice the outcome of resident regeneration consultation, and expecting increased densities or new units from estate demolitions is an invalid 'material consideration' for planning committees unless and until other planning standards and guidance on regeneration has been met. This can also be seen as the "Local Plan" not "Legally Sound" either and therefore, besides omitting all references to "Regeneration" the maps on page 65 should be omitted against the councils own previous withdrawal in the revised Local Plan On Page 65 the sites of the Barkantine, St Johns and Samuda Estates should be excluded from the housing growth areas of North Millwall and North Cubitt Town by moving the boundary North West in Millwall to Byng Street and North East in the immediate North of St Johns Estate			

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1033272	James Stevens	Home Builders Federati on Ltd	LP791	PART 3: POLICIES, Table 1 Minimum number of additional homes across sub- areas (2016 - 2031)	N/A			<p>The Local Plan proposes to provide 3,931 dwellings per annum (dpa) over the period 2016 to 2031, or 58,965 homes in total. The annualised figure of 3,931 corresponds to the strategic benchmark target in the London Plan. In this respect the housing requirement complies with Policy 3.3D of the London Plan by achieving the minimum borough annual average housing target in table 3.1. The London Plan encourages each London Borough to exceed these targets in order to close the gap between London's OAN of 49,000dpa and the identified capacity at the time of the London Plan examination of 42,000dpa. Tower Hamlets has stated that it is unable to exceed its minimum benchmark London Plan target. The HBF does not consider this to be unreasonable. Tower Hamlet's has performed a key role for many years in accommodating a very large share of London's overall housing needs. It is unlikely that it can sustain such levels of delivery in future years and therefore unlikely it will be given as high a housing requirements as in past editions of the London Plans. We are aware that the new London Plan may give Tower Hamlets a lower requirement of 3,511dpa. The table below lists all those London Boroughs that have brought forward new Local Plan following the adoption of the London Plan. The table shows that the London Boroughs are failing to close the gap, indeed, there is a small shortfall against the capacity constrained figure of 42,000dpa, let alone the OAN of 49,000dpa. Local Plan London Plan Increase/shortfall</p> <p>Bromley 641 641 0 Camden 1120 889 231 Croydon 1644 1435 209 Enfield 798 798 0 Hackney 1599 1599 0 Ham & Fulh 1100 1031 69 Haringey 1502 1502 0 Havering 1170 1170 0 Hounslow 822 822 0 Lambeth 1195 1559 -364 Redbridge 1149 1123 23 Rich' Upon Thames 315 315 0 RBKC 733 733 0 Southwark 2000 2736 -736 Sutton 427 363 64 Tower Hamlets 3931 3931 0 Wandsworth 1812 1812</p>			We welcome HBF's acknowledgement of our role in delivering London's housing growth over the last few years and acknowledgement that this will be difficult to sustain.	

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								0 Westminster 1068 1068 0 23026 23527 -504 To what extent it is possible for Tower Hamlets to provide for more than its 3,931dpa minimum benchmark target to help close the gap, and to sustain delivery at this level for the full 15 years of the plan is difficult to judge without a SHLAA. It does strike us as curious that the Mayor can identify additional land supply to consider that Tower Hamlets could provide for 3,511dpa for the next London Plan period, and indeed capacity for 65,000dpa for London overall. These new targets suggest that there is more untapped capacity within Tower Hamlets to accommodate the shortfall of 5,320 dwellings. Even so, on the basis of the current London Plan target, the Council would need to provide 58,965 homes in total over the 15 years of the plan. The Council, however, accepts that it is faced with a shortfall towards the end of the plan period (see paragraph 4.8). Table 4 of the Tower Hamlets Housing Delivery Strategy (September 2017) illustrates this. The Council has a projected housing land supply able to accommodate 54,455 dwellings, compared to the need for 58,965, resulting in a shortfall of 5,320 (more or less equivalent to 1.5 years of overall need). The Council's defence as to why it does not need to demonstrate a housing land supply for the full 15 years consists of two points: a) that its OAN is lower than the London Plan strategic benchmark target; and b) that the new London Plan will establish a lower requirement, thereby removing this problem. We will consider each argument in turn.				
1141974	Janice Boswell		LP27	PART 3: POLICIES, 4.7 Paragraph	No				This is an unfair distribution of new build and population growth within one area. Isle of Dogs and South Poplar			The London Plan establishes opportunity areas in London where high growth is to be encouraged, as they have good access to services, transport and employment opportunity, as well as available developable land. The Isle of Dogs and South Poplar is one such area. In addition, the assumed distribution of growth is based on the best available data

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												in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation restrictions.
1033272	James Stevens	Home Builders Federation Ltd	LP792	PART 3: POLICIES, 4.8 Paragraph	N/A			We accept that the OAN is lower the London Plan minimum benchmark target for London, but for the purposes of the London Plan, the GLA treats London as a single HMA. It therefore assesses the need for housing on a pan-London wide basis. It then apportions the resulting overall figure among the 35 London planning authorities on the basis of their deliverable capacity. The constituent London planning authorities, are however, still required to undertake their own NPPF compliant assessments of need, in order to fulfil the requirements of the NPPF to ensure that local plans to identify the full need for market and affordable housing taking into account issues such as market signals and employment needs. It is important, therefore, to bear in mind that the London Plan OAN is essentially just a demographic projection with an adjustment for backlog. This reflects the date of the GLA's 2013 SHMA which just predated the publication of the NPPG. The GLA's OAN would not meet with the requirements of the NPPF for local plan making (because the London Plan is not, by definition, a development plan document). We refer the Council to paragraph 3.18 of the London Plan. Nevertheless, the targets in the London Plan provide very important starting point benchmarks, and moreover, are based on a strategic approach to housing supply across the capital, where certain boroughs are earmarked to play a more important role in planning for housing needs than others. Tower Hamlets performs an important strategic role in relation to the whole of London. It shoulders a much larger share of meeting London's overall strategic housing need than others, and it does so in order to compensate for much lower			We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.	

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								levels of capacity in other London boroughs (such as Sutton, Bromley, Richmond Upon Thames). As such it would need to continue to provide for 3,931dpa for each of the 15 years of its plan period, to reflect the fact that London needs to provide at least 49,000dpa for the period 2015 to 2036 (see paragraph 3.16b of the London Plan) and London as a whole would need to provide 62,000dpa for the period 2015-2026 if the current backlog and under-delivery between 2011 and 2015 is to be addressed (see paragraph 3.16b of the London Plan). Therefore, we do not accept the argument that because the local OAN using the NPPF method is lower, one need not be so concerned about the under-supply towards the back-end of the plan.				
1142186	Andrew Wood	Isle of Dogs NP Forum	LP125	PART 3: POLICIES, Figure 10 : Housing distribution across 24 places	No	Justified			1. We will secure the delivery of at least 58,965 new homes across the borough (equating to at least 3,931 new homes per year). Revised London Plan targets have been issued by Mayor Sadiq Khan to LBTH in October 2017. The target is now 3,510 new homes a year for TH. We no longer must deliver 58,965 homes. Much of our housing target is strategic to deliver homes or the whole of London but as the Mayor has reduced his expectations, we can also adjust ours.	Yes		The new draft London Plan and the Local Plan use the same assessment of housing supply in the borough (the London SHLAA). The lower draft London Plan target reflects the draft Local Plan's position that we do not have capacity to meet the current housing target. This has been accepted by the GLA. However, the new London Plan has not yet been examined and has not yet been found sound. Therefore, the Local Plan has to demonstrate that we are addressing the existing London Plan target.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP126	PART 3: POLICIES, Figure 10 : Housing distribution across 24 places	No	Justified			1. We will secure the delivery of at least 58,965 new homes across the borough (equating to at least 3,931 new homes per year). Revised London Plan targets have been issued by Mayor Sadiq Khan to LBTH in October 2017. The target is now 3,510 new homes a year for TH. We no longer must deliver 58,965 homes. Much of our housing target is strategic to deliver homes or the whole of London but as the Mayor has reduced his expectations, we can also adjust ours.	Yes		The new draft London Plan and the Local Plan use the same assessment of housing supply in the borough (the London SHLAA). The lower new draft London Plan target reflects the draft Local Plan's position that we do not have capacity to meet the current housing target. This has been accepted by the GLA. However, the new London Plan has not yet been examined and has not yet been found sound. Therefore, the Local Plan has to demonstrate that we are addressing the existing London Plan target.

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829908	Andrew Wood		LP112	PART 3: POLICIES, Figure 10 : Housing distribution across 24 places	No	Consistent with national policy			If you overlay this map with the PTAL map 2021 forecast version and the Flood Zone map the allocation of new housing makes little sense. Areas with excellent transport have no targets, site allocations, tall building zones etc Areas with average PTAL on a flood plain have very high targets Many of the site allocations on the IoD are occupied by businesses, so by pushing residential in, you force out other viable businesses (we know there is an office shortage in London)	Yes		The London Plan establishes opportunity areas in London where high growth is to be encouraged, as they have good access to services, transport and employment opportunity, as well as available developable land. The Isle of Dogs and South Poplar is one such area. In addition, the assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation restrictions. The majority of site allocations have high PTAL ratings. Those site allocations with low PTAL ratings recognise the need to unlock transport improvements as delivery considerations. PTAL ratings were factored into the density assumptions in the London SHLAA and the housing trajectory. Flood risk assessment fed into site selection and the borough has undertaken an in-depth Strategic Flood Risk Assessment including of each site allocation, as well as sequential and exception tests to ensure development is directed to the most sustainable locations. The borough has also undertaken an Employment Land Review and takes a firm position in relation to protecting employment land. All site allocations on existing employment sites will have to at least re-provide the existing employment floorspace and many have employment as a key land use alongside housing, as part of a mixed use development.
1142656	Rabina Khan		LP525	PART 3: POLICIES, Figure 10 : Housing distribution across 24 places	No	Positively prepared; Justified; Effective			Further, the identified areas for development (Isle of Dogs, City Fringe, and Lower Lea Valley) were classified by the GLA, which then introduces the question: It appears the plan is focused on the strategic vision, implying the GLA strategic vision and makes very little reference to the Whitechapel Vision.			The Local Plan must be in conformity with the London Plan. This includes conforming with the spatial strategy for London's growth which is contained within the opportunity areas. There are three of these in the borough. The Whitechapel Vision Masterplan provides local guidance for an area which is mostly within the City Fringe opportunity area. The Whitechapel Vision Masterplan has been referenced in the vision section of the Local Plan as well as in the vision for the City Fringe Area.
1142661	Abdul Basit		LP551	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			Not enough info on life time homes and disable homes with gardens for better life for disable residents Community Land Trust Despite having the London Community Land Trust based in Tower Hamlets a large scale development in Bow, this term is not mentioned at all in the Local Plan and				Standards around outside space and wheelchair accessible housing is set out in policy D.H3: housing standards. Policy S.H1 (2c) supports a variety of housing products which meet local need; this could include a community land trust.

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							therefore there is no guidance on this issue which we think is a material omission.				
1130948	Adam Price	Transport for London	LP290	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No			Meeting housing needs We broadly welcome the objectives of this policy, and in particular the inclusion of the term 'at least' regarding the supply of housing on a borough wide and strategic site basis. We also support the reference to providing the majority of housing growth within the Isle of Dogs and other opportunity areas and allocated sites. However, in line with the London Plan Policy 2.8 (i) and the draft MTS, we suggest that the following criterion is also added: "Promoting and encouraging high-density mixed-use developments around rail and tube stations and other transport hubs". In addition, it should be acknowledged that the above should not preclude the delivery of development on windfall sites which are not allocated or do not fall within a designated growth area. Housing Mix The commitment to provide a mix of dwelling types, sizes and tenures is welcomed, and in line with London Plan Policy 3.8 which sets out that Londoners should have a genuine choice of homes which meet their requirements. However, we note that the policy makes little reference to the increasingly important role that Build to Rent can play in addressing housing needs. The Mayor's Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance was published in August 2017. This document makes clear the Mayor's commitment to the long-term strategic aim of half of all new homes in London being affordable but also his support for the provision of more high quality private rented homes across London. TfL CD will play an important role in its delivery across the TfL portfolio, as public landholder. As such, we would support stronger policy commitment to encouraging 'build to rent' (BtR) where appropriate within the borough			<p>We welcome support for objectives of the policy.</p> <p>Policy S.SG.1 provides the spatial direction for the plan and makes it clear we will support delivery of growth in highly accessible areas. We will insert a more explicit link to this in the supporting text of paragraph 4.14:</p> <p>Housing growth will be primarily delivered in the locations specified in part 1 (a) via a number of different mechanisms: the regeneration of previously developed land, intensification of the built form in opportunity areas, highly accessible locations along transport corridors, and the delivery of site allocations. A smaller proportion of housing will be delivered through town centre intensification, estate regeneration and infill development, bringing back long term vacant properties into residential use and windfall sites. Further details can be found in sections 4 and 5 .</p> <p>There is a numbering error in the supporting text. This will be rectified:</p> <p>4.21 Part 2 (c e) seeks ... 4.22 Part 2 (d e) demonstrates ...</p> <p>Paragraph 4.21 in the supporting text makes it clear that the borough is supportive of innovative housing products such as 'build to rent' where they meet needs in each tenure. The borough does not consider build to rent products sufficiently address housing need in the borough to justify a reduced affordable housing requirement. This is especially given the high affordable housing need in the borough. Given the high density development in the borough it is also considered important for residential development to meet sufficient standards.</p>

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1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP650	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		Policy S.H1: Meeting housing needs We especially support the sections about family sized homes and that all homes should be built to Home Quality Mark standards. We do not have enough family sized homes to create a sustainable community and some are not of good enough quality. The plan lacks to support family sized houses with gardens; this is something that the council and district inspector can look into improving to ensure that all future built have a balance of family sized homes with gardens or at least save the current houses with garden from being demolished & rebuilt			Yes		We welcome support for policies which seek to protect and promote family housing and homes with gardens. It is considered that the plan seeks to protect these as strongly as possible, in the context of local evidence and housing need.

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1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP465	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			The policy is not effective as it does not allow for sites to be delivered and bring forward affordable housing. Part 2 (a.iii) requires a 'minimum of 35% of affordable housing on sites of 11 or more new residential units (subject to viability)'. Paragraph 4.18 goes on to explain that it is part of the policy. However, it is unclear from the wording of the policy and supporting text, whether the Council are requesting for a viability assessment to be submitted on a scheme providing less than 35% affordable housing and/or between 35% and 50% Affordable housing. For example the Mayors SPG on Affordable Housing and Viability SPG does not require a viability assessment to be undertaken on sites which deliver 35% or more of affordable housing. In order to make policy S.H1 Sound, the following changes are proposed. "Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. setting an overall target for 50% of all new homes to be affordable, to be achieved through: i. securing affordable homes from a range of council-led initiatives; ii. requiring the provision of affordable housing contributions on sites providing 2 to 10 new residential units against a sliding-scale target (subject to viability); iii. requiring the provision of a minimum of 35% affordable housing on sites providing 11 or more new residential units (subject to viability INSERT <if less than 35% Affordable Housing>)			Policy D.SG5 (one of the linked policies to S.H1) requires developments to fulfil developer contributions requirements in line with the Tower Hamlets Planning Obligations SPD and Development Viability SPD. The Development Viability SPD acknowledges that the borough will have regard to the threshold approach set up by the GLA. This is also described in paragraph 4.18 of the supporting text, which makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified as follows: ...Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document. The SPD will be added to the Evidence links for policy S.H1.
1054270	BGYRL	Bishopgate Goods Yard Regeneration Limited	LP328	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		The target to secure at least 58,965 new homes over the plan period (2016-2031) is supported. It is also considered appropriate for the majority of housing growth within the borough to be focused in the Opportunity Areas and site allocations. London Plan Housing targets released on 27th October 2017 seeks to deliver 35,110 new homes within LBTH in the ten-year period equating to 3,511 new homes per year. Correlation between LBTH set					The new draft London Plan and the Local Plan use the same assessment of housing supply in the borough (the London SHLAA). The lower draft London Plan target reflects the draft Local Plan's position that we do not have capacity to meet the current housing target. This has been accepted by the GLA. However, the new London Plan has not yet been examined and has not yet been found sound. Therefore, the Local Plan has to demonstrate that we are addressing the existing London Plan target.

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							figures and the London Plan figures would be beneficial.					
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP329	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			The policy notes that the Council will have an overall strategic affordable housing target of 35-50% subject to viability. This target should be reduced to reflect a more realistic percentage of what has been achieved, on average, in LBTH over the last plan period.				The affordable housing target has been assessed in the Local Plan viability assessment and found to be viable.
1142677	Crest Nicholson		LP584	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			Policy S.H1: Meeting Housing Needs identifies a housing target of 58,965 dwellings to be delivered over a 15 year period between 2016 to 2031. The London Plan does not set out specific housing targets beyond 2025, but boroughs are expected to 'roll forward' their annual target. This therefore equates to the delivery of at least 3,931 dwellings per annum (dpa). This is a considerable target and if Tower Hamlets are to meet and exceed this target, as required by the NPPF, it is essential that all appropriate, developable and suitable sites are brought forward through the Emerging Local Plan. At present, Tower Hamlets has a projected housing land supply of 54,455 dwellings. Table 4.6 identifies sub-areas within which a minimum number of additional homes will be located within. The sub-areas and their housing targets are provided in the table below: Figure 1: Minimum number of additional homes across sub-areas (2016-2031) The site is located within the 'Central Area' sub-area which allocates a minimum of 6,671 dwellings over a 15 year period. The allocation of the former London Chest Hospital site for a residential-led mixed use development of circa 350 units would make a significant contribution towards this 15 year housing target. In addition to the above, Figure 10 'Housing distribution across 24 places' within Chapter 4 identifies the site as being located within Globe Town which is part of an area which can expect 'low growth'. Low growth				Proposal is not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated. The capacity of the London Chest Hospital site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan) The sensitivity of the site being within a statutory listed building and also the character of the surrounding area, which includes a conservation area, this limits the amount of development on site to meet the threshold. While the recent planning applications for the site have proposed some form of community facility (e.g. D1 use), it is not considered that any other form of significant infrastructure could be provided to warrant it being a site allocation.

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								<p>in the context of the draft Local Plan is between 1,001 to 2,000 units. It is considered that the levels of growth identified within the sub area boundary of Globe Town should be increased significantly if the London Borough of Tower Hamlets is to meet the identified emerging housing target of 54,455 dwellings over the life of the Plan. Furthermore, the broad locations for growth within the borough remain unclear due to the lack of consistency between the level of growth expected within different areas of the borough, as illustrated in Figure 10, and the need to deliver a significant number of new dwellings over the Plan period. Based on the upper limits within the key of Figure 10, a total provision of only 21,000 units is expected to come forward. This is clearly insufficient as a means of meeting the borough's required needs over the life of the Plan. It is clear that the required growth can be accommodated within areas currently identified for low growth such as Globe Town. These areas are well positioned with respect to local public transport and, in some instances, already accommodate high levels of development. These areas should therefore be identified as being capable of accommodating higher levels of growth, and Figure 10 should be amended accordingly. Affordable Housing Policy S.H1 also provides commentary on the need for a contribution towards new affordable homes. The policy sets an overall target for 50% of all new homes to be affordable and requires the provision of a minimum of 35% affordable housing on sites providing 11 or more new residential units (subject to viability). It is acknowledged that the provision of affordable housing is one of the key issues facing the borough. The Mayor of London seeks to maximise affordable housing output and expects developers to make the most effective use of available affordable housing resources to achieve this objective. We would expect any</p>				

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							proposed site allocation for the former London Chest Hospital to meet this objective and make a contribution towards the borough's need for affordable housing, subject to viability. The contribution to be made, however, would need to be balanced against the costs of restoring the listed building on site and the existing development constraints. It is envisaged that the submission of a viability report setting out the build costs and sale values will therefore need to accompany any application. Regardless, it is expected that the allocation of the site would still provide an opportunity to deliver a large number of affordable units on site, which would make a significant contribution towards the overall supply of affordable homes in the borough in accordance with the aspirations of the Crest Nicholson.				
1142677	Crest Nicholson		LP589	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A		Future Five Year Housing Land Supply The emerging Tower Hamlets Local Plan (2016-2031) proposes to deliver a minimum of 58,965 dwellings over a 15 year period, equating to an annualised target of 3,931 dwellings per annum. This is a considerable target and one that will require a significant number of sites to come forward over the plan period if the Council is to meet their targets. At the time of writing, Tower Hamlets is of the view that it can demonstrate a narrow five year housing land supply of 5.2 years (consisting of a deficit of 481 units). This is somewhat reinforced by a lack of commentary from the Planning Inspectorate within recent appeal decisions. Given the significant housing target proposed within the emerging Plan, this does not present a healthy projection for housing delivery and further sites will be required following the increase in the housing target. In addition, the NPPF requires local planning authorities to meet the full, objectively assessed needs for market and affordable housing by identifying key sites which are critical to the				Proposal is not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated. The capacity of the London Chest Hospital site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan). The sensitivity of the site being within a statutory listed building and also the character of the surrounding area, which includes a conservation area, this limits the amount of development on site to meet the threshold. While the recent planning applications for the site have proposed some form of community facility (e.g. D1 use), it is not considered that any other form of significant infrastructure could be provided to warrant it being a site allocation.

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								<p>delivery of the housing strategy over the plan period. This includes an additional 5% buffer to ensure choice and competition in the market for land. The London Plan (2016) included revised housing targets to cover the Plan period 2015-2025. This reflected the Mayor's intention to seek to address the existing backlog in housing need and takes account of the range of factors which bear on this2. The uplift of the housing requirement incorporates different levels of population change over the 10 year period, the time required to address the current need and the under delivery from 2011 to 2015. It is therefore not necessary to incorporate the housing backlog from 2011 to the current date into the five year housing land supply analysis, as to do so would result in double counting, thus inaccurately reporting the current five year housing land supply position. It is, however, necessary to consider any deficit accrued from 2015 as under delivery from this point will not have been factored into the revised housing targets. The performance against targets over the last five years is displayed below: SEE TABLE The Five Year Supply Requirement position has been calculated below: SEE TABLE Whilst this demonstrates that Tower Hamlets can, at present, demonstrate a five year housing land supply, the high housing target means that this is very marginal and is unlikely to be sufficient over the 10 year target period. This also shows that in the past, the London Borough of Tower Hamlets has struggled to meet its housing needs and it would therefore be prudent and in the interests of proper planning to include the former London Chest Hospital as an allocation for residential development in the Tower Hamlets Local Plan 2031 to boost future supply. It has been difficult to establish the projected five year housing land supply scenario moving forward due to the absence of an up-to-date SHLAA, notably the Greater</p>				

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								<p>London Authority SHLAA 2017. Tower Hamlets has stated that it has a land supply for the first 10 years, however, no published evidence has been supplied to qualify this statement. This should be published in the interests of a consultation that is transparent and open to cross examination. DCLG proposed approach to calculating the local housing need ('the Standard Methodology') The Government is currently consulting on a standardised approach to calculating local housing need. This approach differs from typical assessments of objectively assessed need as it considers the affordability of homes, relative to income. As not to disrupt local authorities that are currently taking emerging Plans through examination, only those Plans that have not been submitted for examination prior to 31 March 2018 will be required to utilise the Standard Methodology. This is also unlikely to impact upon the London Borough of Tower Hamlets as housing targets are determined centrally by the Greater London Authority. Notwithstanding the above, the DCLG published an indicative assessment of housing need for all local authorities to complement the consultation. This showed a disparity between the London Plan housing target and the current objectively assessed housing needs of 942dpa to 4,873dpa. This figure is unlikely to be applied, however, is revealing in terms of the true objective housing need within the London Borough of Tower Hamlets. An issue which will continue unless the Council can appropriately plan for the delivery of housing and affordable within Borough. Summary These representations seek to promote the former London Chest Hospital for future residential (Use Class C3) and non-residential institution floorspace (Use Class D1) development. The site is no longer used as a hospital and is currently underutilised and vacant. It is both suitable and deliverable and available</p>				

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								<p>for immediate development. The site is 1.61ha within a highly accessible location. It is anticipated that circa 350 homes, including a significant number of affordable homes, could be delivered on site alongside the retention of the key listed buildings and structures, such as the main hospital building and the sanitation tower. In addition, the site would also provide a D1 use for both new and existing residents within the locality. Tower Hamlets has a minimum housing target of 58,965 dwellings to be delivered over a 15 year period between 2016 to 2031. This equates to the annual delivery of at least 3,391 dwellings. This is a significant target which will require the allocation of additional sites if the Council is to meet this. The 'Central' sub area, within which the former London Chest Hospital is located, identifies a need for a minimum of 7,624 new homes over a 15 year period. At present, the draft Local Plan only allocates two sites comprising 1,146 units within the Central sub area. There is therefore a need to allocate further sites within the Central sub area to overcome a deficit of 6,478 units. The additional allocation of sites in this location would be in the interests of proper planning to ensure that housing targets can be met over the life of the emerging Plan. This is especially the case given that Tower Hamlets in the past has consistently failed to meet housing targets. We would be grateful for confirmation of receipt of these representations, and look forward to notification of other opportunities to engage. Yours sincerely,</p>				

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1142692	Cubitt Property Holdings Ltd		LP595	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			Our client supports the direction taken by the London Plan (2016) in relation to the promotion of an increased supply of housing within LBTH, with the aspiration for the delivery of 54,455 additional dwellings across the plan period. In particular, we support the identification of the Isle of Dogs as a key growth area for the delivery of housing, with the aspiration for the delivery of 29,848 additional dwellings across the Local Plan period. The Council has raised concerns in relation to the pressure additional housing creates on the existing infrastructure within the Borough. Although we recognise these concerns, housing policy should actively encourage the delivery of new housing and should not be restrictive. We believe the housing targets set out in the London Plan (2016) are achievable and policy should be adopted to promote housing delivery through higher density development, particularly in area with high PTAL ratings and sufficient infrastructure. Emerging policy should also take into account and respond to Government initiatives and changes in national policy. A diverse range of housing provision is required in order to meet the needs of the Borough's residents and workers, and to support a strong local and regional economy. Further clarity is sought on the Councils position on intermediate housing and alternative housing products.				<p>We welcome support for approach in policy S.H1</p> <p>The housing trajectory has been based on capacity assumption used in the GLA's SHLAA - including on density in relation to PTAL. The Housing Delivery Strategy outlines that in some future developments, where sustainable, and on a case by case basis, density may be higher than assumed.</p> <p>The approach to a range of housing products is outlined in policy S.H1 (part 2c) and supporting text (paragraph 4.21).</p>

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1143353	Greenland Hertsmer e (London) Ltd		LP861	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			Policy S.H1: Meeting housing needs We support Tower Hamlets' ambition to secure the delivery of much needed residential accommodation across the Borough. However we suggest the following amendments to the policy wording to ensure that an appropriate balance can be achieved between competing policy objectives that can each have a significant impact on scheme viability, and to enable a broad range of residential products to meet the aspirations of the Borough and to respond to the demands of the market, while allowing sufficient flexibility to enable the earliest delivery of viable schemes. 2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. Setting an overall target for 50% of all new homes to be affordable, to be achieved through: iii. DELETE <requiring> INSERT< seeking> the provision INSERT <(subject to viability)> of a minimum of 35% affordable housing on sites providing 11 or more new residential units DELETE<(subject to viability)> iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs INSERT<(subject to viability)> b. Requiring a mix of unit sizes and tenures INSERT<appropriate to the proposed typology, and with regard to the site location and surrounding context> to meet local need on all sites providing new housing INSERT<(subject to viability)>.				It is considered that the policy already allows sufficient flexibility. The affordable housing policies have been viability tested and found viable. As the policies are worded, the policies are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary. The housing mix is based on an up-to-date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
1143156	Hondo Enterprises	Hondo Enterprises	LP768	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		The target to secure at least 58,965 new homes over the plan period (2016-2031) is supported. It is also considered appropriate for the majority of housing growth within the borough to be focused in the					The new draft London Plan and the Local Plan use the same assessment of housing supply in the borough (the London SHLAA). The lower draft London Plan target reflects the draft Local Plan's position that we do not have capacity to meet the current housing target. This has been accepted by the GLA. However, the new London Plan has not yet been examined and has not yet been found sound. Therefore, the Local Plan has to

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							<p>Opportunity Areas and site allocations. The Isle of Dogs and South Poplar sub-area and the Crossharbour Town Centre in particular has capacity to deliver a high number of homes in order to assist in meeting the housing targets. The minimum target of 29,848 additional homes for the Isle of Dogs and South Poplar area over the plan period is welcomed as it demonstrates this element of the Local Plan has been positively prepared, encouraging the development potential of allocated sites and those within the opportunity area to be maximised in planning applications. London Plan Housing targets released on 27th October 2017 seeks to deliver 35,110 new homes within LBTH in the ten-year period equating to 3,511 new homes per year. Correlation between LBTH set figures and the London Plan figures would be beneficial.</p>					demonstrate that we are addressing the existing London Plan target.

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1033272	James Stevens	Home Builders Federation Ltd	LP790	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			The plan is unsound because it will be ineffective because it is unable to deliver its full housing need over the plan period.			We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.
624580	Jason Larkin	Canary Wharf Group Plc	LP514	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Positively prepared; Justified; Consistent with national policy			Draft policy S.H1 states that the total homes target is for at least 58,965 homes across the plan period (2016 – 2031) and the annualised target remains as previously at 3,931 per annum as in the current London Plan. We note however that the Draft Local Plan does not seem to make any reference to Central Government's September 2017 consultation – 'Planning for the right homes in the right places' which sets a figure of 4,873 dwellings per annum as an Indicative assessment of housing need (2016 to 2026) in Tower Hamlets. This is over 900 dwellings per annum above the London Plan minimum target for Tower Hamlets. The Council needs to consider this target in the formulation of their Local Plan. Whilst we also note that the emerging GLA SHMA proposes a target of 3,511 homes per annum within Tower Hamlets, this is the minimum target and Councils are required to seek to exceed this target. The GLA SHMA is subject to formal review once issued as part of the London Plan consultation expected to take place later this year. The Housing Trajectory as issued as Appendix 7 to the Local Plan notes projected housing supply of 54,455 units including windfall sites across the plan period, this equates to a 5,320 unit shortfall when compared to the housing target of 58,965 homes. Furthermore the housing supply includes 3,010 homes as part of the windfall allowance which is 5.5% of the total housing allowance on sites that are not allocated or identified within the SHLAA. Therefore even with the emerging GLA reduced housing target taking account of the windfall shortfall the minimum number of homes is not reached. Para. 8.21 of the LBTH Housing Delivery Strategy (September 2017) acknowledges that the GLA are drafting an Opportunity Area Planning Framework for the Isle of Dogs and South Poplar and that the GLA's would could result in higher housing delivery rates on the Isle of Dogs and South Poplar than currently anticipated in the trajectory. This work should also be acknowledged in the Draft Local Plan itself. The overall affordable housing target remains at 50%, however there is no regard to the GLA Affordable Housing and Viability SPG (2017) which includes the Fast Track			The 'Planning for the right homes in the right places' consultation is explicit that plans which will be submitted to the examiner before March 2018, as this plan will, do not have to address these indicative assessments in their draft Local Plans. Therefore, we will not be. We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years for the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound. As outlined in the Five-Year Housing Land Supply and Housing Trajectory Statement: position at August 2017, the windfall sites assumptions are conservative and based on past delivery rates. It is noted that the new London Plan sets a small sites target for Tower Hamlets of 566 units which is higher than our current presumed rate of small sites delivery. The Isle of Dogs and South Poplar OAPF has yet to be published even for consultation. It would be premature for the council to reference it in the Local Plan, when it is unclear whether the council considers the approach to be deliverable or sustainable. Policy D.SG5 (one of the linked policies for S.H1) requires developments to fulfil developer contributions requirements in line with the Tower Hamlets Planning Obligations SPD and Development Viability

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								<p>Route if proposing 35%. The recently adopted Council's Development Viability SPD confirms that the Council is now targeting affordable housing in line with the GLA SPG and therefore in order to be effective the policy should be updated to reflect this. Supporting para. 4.21 makes reference to Part 2 (d) of the policy supporting innovative housing products such as 'built-to-rent'. We think that this cross-reference should refer to Part 2 (c). Notwithstanding this, there is no recognition of how this is considered in viability terms given the distinct economics when compared to sale products. Paragraph 4.21 states that all residential developments must meet the requirements outlined in D.H2 and D.H3 including unit size mix, affordable housing and space standards. This is not consistent with the GLA SPG which supports flexible tenure and tenure mix when considering residential proposals including build to rent and therefore to be justified and effective the text should be amended to reflect this. The adopted London Housing SPG (2016) paragraph 3.6.2 states that "the local housing requirements should not be the single determinant of housing mix sought on individual developments. LP Policies 3.8, 3.11 and 3.12 expect boroughs to have regard to housing needs beyond their own boundaries when setting their affordable housing policies. Furthermore student accommodation should not be restricted to meet the requirements of D.H2 and D.H3 given the tenure mix and unit mix are significant different to residential C3 accommodation. The approach to student accommodation and affordable housing requirements should be consistent with the London Plan and requirements set out in the London Plan AMR. It is not appropriate to dictate the market housing mix within D.H2 given this should be based on current market conditions and not prescribed by an affordable housing policy. Paragraph 4.31 seeks a variance of 5% on floor area as a maximum between affordable and private tenures per apartment. It is important that this requirement is not restricted and individual site circumstances, market conditions and site viability and considered as part a proposed development. We note that part 5 of the policy now refers to residential development encouraging increased housing sales to Londoners, preferably for owner occupation (at Regulation 18 stage the reference was to UK citizens. As per our Regulation 18 Representations, we do not see this as a planning policy matter and reference should be removed from the Draft Local Plan</p>			<p>SPD. The Development Viability SPD acknowledges that the borough will have regard to the threshold approach set up by the GLA. This is also described in paragraph 4.18 of the supporting text, which makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified by through adding wording to this paragraph:</p> <p>Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document.</p> <p>The SPD will be added to the evidence links for policy S.H1.</p> <p>There is a numbering error in the supporting text. This will be rectified:</p> <p>4.21: Part 2 (c d) seeks ... 4.22: Part 2 (d e) demonstrates ...</p> <p>Paragraph 4.21 in the supporting text makes it clear that the borough is supportive of innovative housing products such as 'build to rent' where they meet needs in each tenure. The borough does not consider build to rent products sufficiently address housing need in the borough to justify a reduced affordable housing requirement. This is especially given the high affordable housing need in the borough. Given the high density development in the borough, it is also considered important for residential development to meet sufficient standards.</p> <p>The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.</p> <p>It is considered that the supporting text regarding student housing and affordable housing and standards could be clarified:</p> <p>4.21 ... All residential developments,</p>

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											<p>excluding student and specialist housing (which are addressed in policies D.H6 and D.H4 respectively), must meet the requirements outlined in policies D.H2 and D.H3, including unit size mix, affordable housing and space standards. In addressing these requirements, consideration will be given to the size of the development. We also support the delivery of residential moorings in suitable locations (further guidance is provided in policy D.OWS2).</p> <p>As outlined in paragraph 4.31, the 5% size variation is to prevent the delivery of oversized market units artificially reducing the delivery of affordable housing.</p> <p>This policy is considered appropriate and deliverable. Supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas.</p>
719346	John Turner	Ballymore Group	LP266	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No			<p>Policy S.SH1 – Meeting housing needs We strongly support the provision of new housing within the Borough. The Councils intent to meet the ambitious target of approximately 3,931 homes per annum as set by the GLA within the London Plan (2015) is fully welcomed. The identification of key regeneration areas for the delivery of housing is also beneficial in bringing clarity to the development process. London Plan Housing targets released on 27th October 2017 seek to deliver 35,110 new homes within LBTH in the ten-year period equating to 3,511 new homes per year. Correlation between LBTH set figures and the London Plan figures would be beneficial. The policy notes that the Council will have an overall strategic affordable housing target of 35-50% subject to viability. This target should be reduced to reflect a more realistic percentage of what has been achieved, on average, in LBTH over the last plan period. Further information is required for part 5 of the policy which states the Council will seek to encourage developers to sign up to the Mayor of London's Mayoral Concordat on Housing Development. It should be confirmed that this document is the 2013 version currently available and published by the previous Mayor of London. It should be noted that Ballymore are signatory of this document and a strong supporter of its intent. Note: Stated that Plan is broadly sound,</p>	Yes		<p>We welcome support for the provision of new housing.</p> <p>The new draft London Plan and the Local Plan use the same assessment of housing supply in the borough (the London SHLAA). The lower draft London Plan target reflects the draft Local Plan's position that we do not have capacity to meet the current housing target. This has been accepted by the GLA. However the new London Plan has not yet been examined and has not yet been found sound. Therefore, the Local Plan has to demonstrate that we are addressing the existing London Plan target. This commitment is outlined in the Housing Delivery Strategy.</p> <p>The affordable housing target has been assessed in the Local Plan viability assessment and found to be viable.</p> <p>Support for part 5 is welcomed. The Mayoral Concordat referenced is the 2013 concordat. It is not considered necessary to reference this, as the policy is designed to be flexible enough to include any future</p>

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									only minor modifications proposed			replacement scheme - the development of which has been committed to in the Mayor of London's Housing Strategy.
1131148	LB Hackney	LB Hackney	LP572	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			Tower Hamlets' policy SH1 sets a target to deliver at least 58,965 homes over the plan period to 2031, equating to 3,931 new homes per year. We understand that Tower Hamlets is seeking to play a key role in meeting strategic housing need for London and this housing target is therefore higher than the objectively assessed need for 2016-31 of 46,458 set out in the SHMA (May 2017). As you are aware, Hackney is preparing a new borough-wide Local Plan - Local Plan 2033 (LP33) to explore ways to meet our objectively assessed housing need of 26,370 new homes over our Plan period from 2018 to 2033. Although we have consistently met our capacity-based London Plan target, housing need is currently higher than our emerging London Plan target. You will also be aware that Hackney and Tower Hamlets have a shared housing market area. In these circumstances, since Tower Hamlets' capacity based housing target is higher than the housing need for the borough, a sound approach could be for any of unmet housing need in Hackney to be accommodated within Tower Hamlets.				We understand LBTH's position with regards to the borough's shared housing market and housing surplus relative to its OAN but we consider that our housing surplus to contributes to London's wider strategic housing need, rather than contributing to housing need for any one specific borough.
1054252	Londone wcastle	Londone wcastle	LP621	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Consistent with national policy			The target to secure at least 58,965 new homes over the plan period (2016-2031) is supported in principle, although it is important to emphasise these should be considered minimum targets. It is also considered appropriate for the majority of housing growth within the borough to be focused in the Opportunity Areas and site allocations, although as above the opportunity to deliver new homes elsewhere in the borough should also be set out in the Local Plan. London Plan Housing targets released on 27th October 2017 seeks to deliver 35,110 new homes within LBTH in the ten-year period equating to 3,511 new homes per year. However, the evidence which underpins this figure, and which underpins the draft Local Plan, have yet to be tested. On the evidence available, we do not consider the LBTH is able to demonstrate a five -year housing land supply, and consider the 5% buffer used is inadequate to address previous under delivery. In advance of examination of these and other issues, in accordance with the London Plan, the current figure of			We welcome support for approach to meet housing target. The evidence base which underpins the 5-year supply isn't the SHLAA, it is the Five Year Housing Land Supply and Housing Trajectory Statement (2017), which is available to scrutiny and evidences why the 5% buffer is adequate. The boundaries of growth areas in figure 10 are ward boundaries, as that the smallest spatial scale we can disaggregate future growth down to. The boundaries cannot be changed. In order to clarify the role of figure 10, we propose inserting the following additional information (footnote 18): Please note: figure 10 is a spatial

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								<p>3,931 should be retained. Figure 10 identifies where and the level of residential unit growth will occur within the Borough. Although this is a helpful aid, the Whitechapel Masterplan area is split between low (1,001 – 2,000 units) and medium (2,001 – 3,000 units) growth. This does not reflect the housing target of 3,500 units within the Whitechapel Vision Masterplan document. We request that the figure be updated to reflect a high growth (3,001 – 4,000 unit) area. It is also unclear how the image should be read. Further clarity on this should be provided. The policy notes that the Council will have an overall strategic affordable housing target of 35-50% subject to viability. We can confirm that our client supports this aspiration in principle. However, it is critical that the Local Plan adopts a pragmatic approach to achieving these targets within the context of viability. Such an approach is crucial to achieving the overall housing delivery targets set out in the draft Local Plan. The NPPG states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014 and should be taken into account. These circumstances are that; - Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area) Part 2 of the policy introduces the provision of affordable housing contributions on sites providing 2 to 10 new residential units against a sliding-scale target. This approach to the provision of affordable housing is not aligned with the NPPF and should be removed from the draft Local Plan. As a result, we do not believe the draft plan to be consistent with national policy.</p>			<p>representation of the housing trajectory outlined in table 1 and provided in greater detail in appendix 7. Due to how the data is available the distribution of growth is based around ward boundaries and is therefore indicative.</p> <p>The assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints, such as existing land uses or conservation/heritage restrictions. In summary, the locations of growth represent our understanding of where growth is coming forward in the borough based on the supply of land. Each development scheme will still have to accord with the policies in the plan and be judged on its own merits.</p> <p>The affordable housing policies have been viability tested and found viable. As the policies are worded, the policies are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary.</p> <p>Affordable housing contributions from small sites is considered necessary due to the role smaller sites plays in delivering housing (which is due to grow following new London Plan approach to small sites) and the affordable housing need in the borough. It has also been tested and found viable in the Local Plan Viability Assessment. The ability for boroughs to establish small sites affordable housing policies following the written ministerial statement has been established in a number of Local Plan examinations. Further details on the policy and approach taken are available here: Small Sites Affordable Housing Contributions Paper (2017)</p>

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1142716	Lyca Group		LP644	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A		We support Tower Hamlets' ambition to secure the delivery of much needed residential accommodation across the Borough. However we suggest the following textual amendments to the policy wording to ensure that an appropriate balance can be achieved between competing policy objectives that can each have a significant impact on scheme viability, and to enable a broad range of residential products to meet the aspirations of the Borough and to respond to the demands of the market, while allowing sufficient flexibility to enable the earliest delivery of viable schemes. 2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. Setting an overall target for 50% of all new homes to be affordable, to be achieved through: iii. DELETE <requiring> insert < seeking> the provision INSERT <(subject to viability)> of a minimum of 35% affordable housing on sites providing 11 or more new residential units INSERT<(subject to viability)> iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs (subject to viability) b. Requiring a mix of unit sizes and tenures INSERT <appropriate to the proposed typology, and with regard to the site location and surrounding context> to meet local need on all sites providing new housing insert <(subject to viability).>				It is considered that the policy already allows sufficient flexibility. The affordable housing policies have been viability tested and found viable. As the policies are worded, the policies are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary. The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.

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1142656	Rabina Khan		LP527	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Positively prepared; Justified; Effective			The deprivation of TH is high and the inequality of wealth is huge. The plan states that 50% of the rented element should be London affordable rents (an average of the entire City of London rather than TH specific) from the precious negotiated affordable delivery via S106. The rent levels would therefore be unaffordable for many due to the annual household income (excluding CW wage). Tower Hamlets has one of the most drastic levels of wealth inequality nationwide: 48.7% of households have an annual income of less than £30,000, 17% have an annual income exceeding £60,000 and another 17% have an annual income of less than £15,000. Although the affordable rent split has remained the more or less the same (2013 local plan - 30% 1 bed, 25% 2 beds, 30% 3 beds, 15% 4 beds), intermediate tenure has seen a significant increase (2013 local plan – 25% 1 bed, 50% 2 beds, 25% 3 beds, 0% 4 beds). The local plan of 2013 recommended far less intermediate rent and more social/affordable rent. According to the Homes for Londoners (Draft Affordable Housing and Viability Supplementary Planning Guidance 2016), it provides a definition of intermediate dwellings, giving an indication of the salary that meets the specification. (Homes for Londoners), P21, 2.38: "...the Mayor intends to limit eligibility for London Living Rent and other intermediate rent products to households on incomes of £60,000 a year or less in the forthcoming (2017) report." This suggests that there is clear disparity in terms of the tenure of housing envisioned for Tower Hamlets. Based on a salary of £15,000, it would be unaffordable for individuals to live in intermediate housing. Therefore, the need for social/affordable rent is far greater and more social/affordable rent should be developed. This means an individual must live on £6,000 (net) after paying rent, which is £750/month. This excludes other living costs (utilities, food, travelling to/from work). This could mean residents may be forced to seek alternative accommodation out of the borough due to the limited stock of social/affordable rented homes.			London Affordable Rent reflects the formula rent cap figures for social rents and are the equivalent of target rents, the lowest rents we currently require under the Managing Development Document (2013). The policy still requires a split between rented affordable houses and intermediate houses of 70% and 30% (D.H2.1). This is the same as the Managing Development Document (2013). Within the 30% intermediate requirement, the requirement for family unit provision has increased from the Managing Development Document (2013) requirement. This reflects the new Mayor of London intermediate tenure (London Living Rent) which is more affordable to local residents. This split therefore seeks a greater delivery of affordable family homes than the Managing Development Document (2013).
1053881	Sally Styles	C M A Planning Ltd	LP94	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Justified			S.H1 – Meeting Housing Needs Comment: Part 2a)i) of this policy introduces financial contributions towards affordable housing for smaller schemes from 2 units and upwards using a sliding scale. This is an onerous requirement for smaller schemes and whilst the policy does allow for such contributions to be subject to viability, requiring the submission of such reports with smaller schemes is an onerous requirement for developers and may prevent the delivery of many smaller sites. Suggested Amendment: Delete Part 2a)i) of Policy S.H1	Yes		It is not considered that this change is necessary. The Affordable Housing Contributions for Small Sites Topic Paper (2017) outlines the justification and approach for this policy, including evidencing how the proposed approach is the least burdensome for small developments and is therefore proportionate. It is noted that the new London Plan sets a small sites target for Tower Hamlets of 566 units which is higher than our current presumed rate of small sites delivery. The importance of small sites in housing delivery will therefore increase;

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												increasing the need for this policy in ensuring housing delivery meets the borough's affordable housing need.
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP953	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			Policy S.H1 (Meeting housing needs) We support Tower Hamlets' ambition to secure the delivery of much needed residential accommodation across the Borough. However we suggest the following textual amendments to the policy wording to ensure that an appropriate balance can be achieved between competing policy objectives that can each have a significant impact on scheme viability, and to enable a broad range of residential products to meet the aspirations of the Borough and to respond to the demands of the market, while allowing sufficient flexibility to enable the earliest delivery of viable schemes. 2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. Setting an overall target for 50% of all new homes to be affordable, to be achieved through: iii. DELETE <requiring> INSERT <seeking> the provision INSERT <(subject to viability)> of a minimum of 35% affordable housing on sites providing 11 or more new residential units DELETE <(subject to viability)> iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs INSERT <(subject to viability)> b. Requiring a mix of unit sizes and tenures INSERT < appropriate to the proposed typology, and with regard to the site location and surrounding context> to meet local need on all sites providing new housing INSERT <(subject to viability)>.			It is considered that the policy already allows sufficient flexibility. The affordable housing policies have been viability tested and found viable. As the policies are worded, the policies are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary. The housing mix is based on an up-to-date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.

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1053788	Steve Craddock	The Canal & River Trust	LP354	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Consistent with national policy			The Trust's waterways in London are increasingly playing a role in meeting London's development needs. Over the past 7 years the number of boats on London's waterways has increased significantly, from 2164 in 2010 to 4786 in 2017 (121% growth). Over this period, the number of boats without a home mooring, i.e. those that should be continuously cruising the network, has more than quadrupled (417 in 2010 to 1906 in 2017). Sections of the waterways in Tower Hamlets, including around Victoria Park, are very popular with boaters. As you are aware, we are developing a London Mooring Strategy to respond to this growth but we need to work with other organisations, in particular the public sector, to achieve its aims. The Trust would be keen to discuss any assessment that the council proposes to take to meet the requirements of section 124 of the Housing & Planning Act (i.e. requirement for housing authorities to "consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored"). We believe that the Council should consider the comments that we have made on the soundness of policies S.OSW2 and D.OSW4 in this context. The lack of consideration of this issue in the Draft Tower Hamlets Water Space Strategy is, we suggest, a significant weakness of this document.			The SHMA (2017) assessed the 'needs of people residing in houseboats' and concludes that the majority of those residing in houseboats are doing so due to affordability constraints in accessing bricks and mortar housing. The SHMA has therefore considered their needs in relation to housing need in the borough. This is the primary way the Local Plan has sought to address their needs. However, the plan also seeks to support the delivery of permanent residential moorings in suitable locations.
1143450	Thomson Reuters		LP946	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			We support Tower Hamlets' ambition to secure the delivery of much needed residential accommodation across the Borough. However we suggest the following textual amendments to the policy wording to ensure that an appropriate balance can be achieved between competing policy objectives that can each have a significant impact on scheme viability, and to enable a broad range of residential products to meet the aspirations of the Borough and to respond to the demands of the market, while allowing sufficient flexibility to enable the earliest delivery of viable schemes. 2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. Setting an overall target for 50% of all new homes to be affordable, to be achieved through: iii. DELETE <requiring> INSERT <seeking> the provision INSERT<(subject to			It is considered that the policy already allows sufficient flexibility. The affordable housing policies have been viability tested and found viable. As the policies are worded, the policies are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary. The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that: 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.	

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							viability)> of a minimum of 35% affordable housing on sites providing 11 or more new residential units DELETE <(subject to viability)> iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs insert <(subject to viability)> b. Requiring a mix of unit sizes and tenures INSERT <appropriate to the proposed typology, and with regard to the site location and surrounding context> to meet local need on all sites providing new housing INSERT <(subject to viability).>				
1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP889	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A		Policy S.H1 sets out the target for delivery of at least 58,695 new homes across the borough between 2016 and 2031. This equates to an annual target c. 3,931 new homes. The Planning for the right homes in the right places: consultation proposals, published by the Government in September 2017, sets out a standardised methodology for calculating a borough's objectively assessed need for development. The Application of proposed formula for assessing housing need, with contextual data for Tower Hamlets generates an annual requirement for the borough of 4,873 net additional homes. Therefore, we consider that further review should be undertaken in relation to the boroughs objectively assessed need. Especially, given the significant annual difference from the proposed target set out in draft Policy S.H1 and the annual requirement generated by the standardised methodology.				The 'Planning for the right homes in the right places' consultation is explicit that plans which will be submitted to the examiner before March 2018, as this plan will be, do not have to address these indicative assessments in their draft Local Plans. Therefore, we will not be, nor do we need to, undertake a new SHMA.

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1143399	Westferr y Develop ments Ltd.	Westferr y Develop ments Ltd	LP924	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		The target to secure at least 58,965 new homes over the plan period is welcomed. The focus of this delivery within the Opportunity Areas and site allocations is also supported. The minimum target of 29,848 additional homes for the Isle of Dogs and South Poplar area over the plan period is welcomed as it demonstrates this element of the Local Plan has been positively prepared, encouraging the development potential of allocated sites and those within the Opportunity Area to be maximised in planning applications.					Support for approach taken in policy S.H1 is welcomed

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1049487		Ashbourne Beech Property	LP105	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Justified			Policy S.H1. The housing needs of the borough. A target of 58,965 homes across the borough is to be secured between 2016 – 2031. Table 1 and Figure 10 identify that the Isle of Dogs and South Poplar will accommodate the bulk (56%) of this housing need. [note, however, that Table 1 includes reference to a total of 54,455 homes (as opposed to 58,965) and that the 54,455 does not tally with the numbers that are set out: is 54,254]. The broad thrust of the policy to focus most new housing in the opportunity areas and site allocations is supported. Part 2 addresses the need to create mixed and balanced communities. The policy states that an overall target for 50% of all new homes to be affordable will be achieved through, amongst others, requiring provision of a minimum of 35% affordable housing on sites providing 11 or more new residential units “(subject to viability)”. The acknowledgement of viability to an assessment of this matter is welcomed. It is though suggested that the policy includes further text, similar to that suggested for Policy D. SG5, that acknowledges that “...the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.” (NPPF, para 173)	Yes		Policy S.H1 (part 2iii) makes it clear that the requirements are subject to viability. There is no need to repeat NPPF policy in the Local Plan.
1142493		Berkeley Group	LP402	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No				S.H1: Meeting Housing Needs Berkeley Group is broadly supportive of the policy. The Plan should make clear the relationship between this approach and the Mayor of London's 'threshold' approach to affordable housing. As noted in our covering letter part (5) of the policy is not deliverable and should be removed. The policy could also refer to 'Build to Rent' products as appropriate Soundness test: Revise to make deliverable and therefore effective	Yes		Support for the general approach in policy S.H1 is welcomed. Policy D.SG5 (one of the linked policies to S.H1) requires developments to fulfil developer contributions requirements in line with the Tower Hamlets Planning Obligations SPD and Development Viability SPD. The Development Viability SPD acknowledges that the borough will have regard to the threshold approach set up by the GLA. This is also described in paragraph 4.18 of the supporting text, which makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified through adding wording to this paragraph: Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document. The SPD will be added to the evidence links for policy S.H1. This policy is considered appropriate and

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												<p>deliverable. Supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the Mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas.</p> <p>There is a numbering error in the supporting text. This will be rectified:</p> <p>4.21 Part 2 (c d) seeks ... 4.22 Part 2 (d e) demonstrates ...</p> <p>Paragraph 4.21 in the supporting text makes it clear that the borough is supportive of innovative housing products such as 'build to rent' where they meet needs in each tenure. The borough does not consider build to rent products sufficiently address housing need in the borough to justify a reduced affordable housing requirement. This is especially given the high affordable housing need in the borough. Given the high density development in the borough it is also considered important for residential development to meet sufficient standards.</p>
1142590		British Airways plc	LP477	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	N/A			We support Tower Hamlets' ambition to secure the delivery of much needed residential accommodation across the Borough. However we suggest the following textual amendments to the policy wording to ensure that an appropriate balance can be achieved between competing policy objectives that can each have a significant impact on scheme viability, and to enable a broad range of residential products to meet the aspirations of the Borough and to respond to the demands of the market, while allowing sufficient flexibility to enable the earliest delivery of viable schemes. 2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through: a. Setting an overall target for 50% of all new homes to be affordable, to be achieved through: iii. DELETE				<p>It is considered that the policy already allows sufficient flexibility. The affordable housing policies have been viability tested and found viable. As the policies are worded, they are already clearly subject to viability, allowing flexibility where it can be evidenced this is necessary.</p> <p>The housing mix is based on an up-to-date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs. "</p>

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								<requiring> INSERT < seeking> the provision INSERT <(subject to viability)> of a minimum of 35% affordable housing on sites providing 11 or more new residential units DELETE <(subject to viability)> iv. requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs INSERT <(subject to viability)> b. Requiring a mix of unit sizes and tenures INSERT <appropriate to the proposed typology, and with regard to the site location and surrounding context> to meet local need on all sites providing new housing INSERT <(subject to viability)>.				
1142548	Grafton Group PLC	Grafton Group PLC	LP430	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		Policy S.H1: Meeting housing needs We are fully supportive of the target of delivering a minimum of 58,965 new homes across the borough between 2016 and 2031.					We welcome support for the approach to delivering housing
1142548	Grafton Group PLC	Grafton Group PLC	LP433	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			Policy D.H2: Affordable Housing The borough's proposed approach to maximising affordable housing provision is acknowledged. However, in relation to Part 3 of the policy, we believe it would be more appropriate to maintain flexibility around the mix of market unit sizes rather than specifying a defined mix in policy. In this regard, ensuring the most viable market mix in response to the particular circumstances of an individual site (whilst ensuring market housing needs are met) will ultimately assist in the securing the delivery of the maximum affordable housing provision. Therefore, as currently drafted, we do not consider the policy to be sound.			The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
1142035		Hermes Property Unit Trust	LP158	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes			Policy S.H1: Meeting housing needs We generally support the provisions and requirements of the Policy, including the ability to provide viability information in Criteria iii where the 35% affordable housing threshold cannot be met. We query how Part 5 of the policy can be reasonably enforced in a global free market economy.		Yes		This policy is considered appropriate and deliverable. Supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas.

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1033284	Unknown	One Housing Group	LP411	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		One Housing welcomes the amendment to Policy S.H1 (Part 2), which now requires the provision of a minimum of 35% affordable housing on sites providing 11 or more new residential units (subject to viability).			Yes		Support for policy S.H1 is welcomed
1033284	Unknown	One Housing Group	LP398	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Positively prepared; Effective			One Housing supports the emphasis Policy S.H1 places on meeting housing need by securing at least the housing target within the London Plan (at least 3,931 new homes per year). However, it is noted that a shortfall of 4,510 dwellings remains towards the end of the Plan period. LB Tower Hamlets commit at Paragraph 4.8 to working with partners, including the Greater London Authority, to maximise housing supply within the parameters of sustainable development and address this unmet need. Whilst One Housing supports the recognition in Policy S.H1 that housing estate regeneration schemes on unallocated sites will be one way that housing needs would be met, the Local Plan fails to allocate sufficient land to meet the minimum housing target set out in the London Plan. It is recognised that the Local Plan exceeds the objectively assessed need identified in the Tower Hamlets SHMA (2017), however London's two tier planning system and extended Development Plan means that the Local Plan is not considered to be effective nor positively prepared if there is a reasonable prospect that it will fail to deliver the minimum housing target set out in the London Plan, which is based in part on the London SHMA (2013). Relying on measures including "higher-than-average density levels" are not considered to be justified when the Local Plan seeks to restrict the locations of Tall Building Zones. The NPPF places significant emphasis on deliverability and reinstating the full extent of the Tall Building Zone in Policy D.DH6 would provide additional flexibility and the greatest opportunity to ensure that the minimum housing target set out in the London Plan is met in the event that more ambitious regeneration plans are deemed appropriate on estates within the Isle of Dogs. Further to the above justification, London Plan Policy 3.11 is clear that there is a pressing need for more homes in London and that Boroughs should seek to "achieve and exceed" the minimum annual average housing target noted above. When the pressing need is viewed in the light of the proposed standard method for assessing housing need	Yes		We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound. As acknowledged, the 'Planning for the right homes in the right places' consultation is explicit that plans which will be submitted to the examiner before March 2018, as this plan will be, do not have to address these indicative assessments in their draft Local Plans. Therefore, we will not be. Assessments undertaken in the SHLAA for anticipated delivery assumed the highest density provided in the existing London Plan density matrix, however we anticipate that in some circumstances, potentially in tall building zones, density may be higher - this is outlined in the Housing Delivery Strategy. In addition, the tall building policy enables tall buildings to be delivered outside of tall building zones, when they meet key requirements. It is not considered that this approach needs to change as it is considered flexible enough to enable sufficient housing delivery, whilst ensuring limited impact on infrastructure and streetscape.

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									(Planning for the Right Homes in the Right Places, DCLG, September 2017), housing need is significantly increased for Tower Hamlets at 4,873 homes per year, which is 24% greater than the current minimum target set out in the London Plan. Whilst the transitional arrangements mean that the Local Plan is able to continue with its current approach to housing delivery if LB Tower Hamlets submit for examination by 31st March 2018, it is considered that the Council must show a higher likelihood of delivering the current minimum housing target and suggest that this is done through the Tall Building Zone measure set out above. One Housing supports Paragraph 4.10, which states that Tower Hamlets will undertake a review of the Local Plan to explore ways of addressing unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase housing supply, if the housing target is not being met. However, the Local Plan should do all it can to positively address the identified shortfall.			
1053884		Queen Mary University of London	LP665	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No				Policy S.H1 (Housing Needs) sets out that development will be supported which seeks to meet the needs of specific communities including students, however it does not refer to the specific policies relating to Student Accommodation. For clarity, we would recommend that the Council make reference to these specific policies.	Yes		It is not considered this change is necessary as the student housing policy is referenced in the policy links box at the end of the policy.
1142556	Regal London	Regal London	LP436	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			Policy D.H2: Affordable Housing The borough's proposed approach to maximising affordable housing provision is acknowledged. However, in relation to Part 3 of the policy, we believe it would be more appropriate to maintain flexibility around the mix of market unit sizes rather than specifying a defined mix in policy. In this regard, ensuring the most viable market mix in response to the particular circumstances of an individual site (whilst ensuring market housing needs are met) will ultimately assist in the securing the delivery of the maximum affordable housing provision. Therefore, as currently drafted, we do not consider the policy to be sound.			The housing mix is based on an up-to-date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
1142556	Regal London	Regal London	LP432	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	Yes		Policy S.H1: Meeting housing needs We are fully supportive of the target of delivering a minimum of 58,965 new homes across the borough between 2016 and 2031.					We welcome support for the approach to delivering housing

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1142556	Regal London	Regal London	LP435	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No	Effective			Policy D.H2: Affordable Housing The borough's proposed approach to maximising affordable housing provision is acknowledged. However, in relation to Part 3 of the policy, we believe it would be more appropriate to maintain flexibility around the mix of market unit sizes rather than specifying a defined mix in policy. In this regard, ensuring the most viable market mix in response to the particular circumstances of an individual site (whilst ensuring market housing needs are met) will ultimately assist in the securing the delivery of the maximum affordable housing provision. Therefore, as currently drafted, we do not consider the policy to be sound.			The housing mix is based on an up-to-date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP897	PART 3: POLICIES, 4.12 Paragraph Policy S.H1: Meeting housing needs	No				Policy S.H1 Meeting Housing Needs The target to secure at least 58,965 new homes over the plan period (2016-2031) is supported. It is also considered appropriate for the majority of housing growth within the borough to be focused in the Opportunity Areas and site allocations however it should be acknowledged that other brownfield sites have the capacity to significantly contribute to these targets.			The role of brownfield land is already acknowledged in the supporting text (paragraph 4.14).
1033272	James Stevens	Home Builders Federation Ltd	LP811	PART 3: POLICIES, 4.13 Paragraph	N/A			We consider that the Council should distinguish between the supply of C3 use and C2 use class homes. The HBF is not convinced that the construction of C2 use class homes, and counting each room as a unit of completion, will contribute to meeting the housing needs of the borough (see paragraph 2.26 of the London Plan Annual Monitoring Report 2015/16. Also page 29 of the AMR for 2015/16 records that 417 rooms in the C2 use class were counted as completions). The future demand for student accommodation is not something that is necessarily reflected in the ONS/DCLG trend-based housing projections. This is a problematical area that the GLA has acknowledged (see paragraph 2.26 of the London Plan Annual Monitoring Report 2015/16). We note in the GLA's most recent AMR that in 2015/16 that 58% of its overall supply in the LLDC came in the form of C2 use class dwellings, where a contribution to the housing target is counted in the form of rooms. The figure was 25% in Tower Hamlets was 15%. In Hackney the supply of C2 uses exceeds C3 supply. See London Plan Annual Monitoring Report 2015/16, page 28. This is a very dubious area but we recognise why it is politically expedient to count				The Local Plan monitoring takes its lead from the London Plan monitoring as we are required to provide data to the GLA in certain forms. This is why policy S.H1 seeks to use the same definition of residential development as the 2016 London Plan. We note that the new London Plan suggests a different ratio of 3 student beds counting as 1 residential unit, to better reflect the role student housing delivery plays in freeing up conventional housing. We will continue to use the approach in the adopted London Plan.

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								student rooms towards the housing target because it reduces the overall land supply requirement. Unfortunately, it will have serious repercussions. If student rooms continue to be counted as net additions to the housing stock, then this increases the risk that local authorities will under-provide against their conventional housing needs which are essentially measured by the household projections. This is why some university cities like Canterbury and Norwich do not count student rooms/dwellings towards their housing targets. The development of residential land earmarked for traditional housing needs is beginning to cause tensions in some cities, like Bath. This is because the student population is growing at a much faster rate than the population/household projections, and because the population/household projections are based on past trends they fail to take into account the expansion plans of the universities.				
1033272	James Stevens	Home Builders Federation Ltd	LP805	PART 3: POLICIES, 4.19 Paragraph	No	Consistent with national policy			The threshold is contrary to national policy as set out in the WMS of 28 November 2014. We have noted the Council's Affordable Housing Contributions for Small Sites Topic Paper. We agree that Tower Hamlets, like all other London Boroughs, has a high need for homes that fall within the affordable housing tenure. Part of the reason for this high need has been London's failure to build sufficient homes for several decades. The solution to this problem is not to increase the affordable housing target and to 'cast the net' wider to encompass smaller sized developments, but to increase housing targets and the supply of land in locations where household formation is strongest. However, we recognise that this solution lies partly beyond the scope of the Tower Hamlet's Local Plan. However, the risk associated with levying affordable housing obligations from smaller developers is that it could discourage development. The purpose of the government's change in policy in terms of raising the threshold for contributions to affordable housing is to assist small developers by removing policy burdens. It was not concerned about the loss of affordable housing units. Measures to support small developers are considered by the government to be more important than affordable housing supply. The government's concern about the decline in the number of smaller housebuilders is articulated in the			Affordable housing contributions from small sites is considered necessary due to the role smaller sites plays in delivering housing (which is due to grow following new London Plan approach to small sites) and the affordable housing need in the borough. It has also been tested and found viable in the Local Plan Viability Assessment. We are therefore confident that the policy will not affect the delivery of small sites. The ability for boroughs to establish small sites affordable housing policies following the Written Ministerial Statement has been established in a number of Local Plan EIPs. The Housing White Paper is noted but the proposals it outlines have not yet been embedded in policy. Further details on the policy and approach taken are available here: Small Sites Affordable Housing Contributions Paper (2017).

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								<p>Housing White Paper. To help reverse this decline the government is proposing to increase the number of small site allocations in local plans – equivalent to 10% of all allocations – to help support the growth of smaller developers. The HBF, in its response to government, has argued that a more effective measure would be to ensure that 10% of the overall housing requirement should be provided on small sites, because 10% of overall allocations may not amount to that many dwellings in total (for example, you could have 10% of the housing allocations in a plan made up of sites that are able to accommodate three units each). We note that the current Tower Hamlets Local Plan seeks contributions from schemes of ten dwellings or more (Policy SP02). It is curious that just as the government is trying to introduce measures to assist smaller developers the Council is introducing a lower threshold policy. It is also questionable whether the policy is proportionate: will the benefits of securing contributions to affordable homes outweigh the possible benefits accrued from the support the government’s policy gives to supporting small developers. Table 4 of Affordable Housing Contributions from Small Sites Topic Paper records relatively small numbers of dwellings being provided from sites under 10 units (the government’s advised threshold is actually 10 units and under) – an average of 215 a year (paragraph 6.2). This represents about 5.5% of the overall housing requirement of 3,931dpa. We note in Table 1 of the Council’s Five Year Land Supply and Housing Trajectory Statement the following completions in previous years: Year Housing completions Small sites as a % (avg 215)</p> <p>2012/13 3,062 7% 2013/14 2,285 9.5% 2014/15 2,522 8.5% 2015/16 3,121 7% 2016/17 4,260 5% This is a relatively small supply of homes from small sites as a percentage of overall net supply. Relatively few affordable homes will be secured as a consequence of lowering the threshold compared to the assistance to small developers that applying the government’s new policy could have – a policy designed to help the industry grow and diversify. We think this objective of the government’s should be accorded more weight in the Local Plan. The Council should adhere to the national policy position and not seek affordable housing obligations from schemes of 10 dwellings and fewer.</p>			

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1033272	James Stevens	Home Builders Federation Ltd	LP807	PART 3: POLICIES, 4.23 Paragraph	No	Consistent with national policy		The Council cannot require or encourage developers to meet the Home Quality Mark standard. This is contrary to government policy. The Written Ministerial statement of 25 March 2015 stopped local planning authorities from requiring developers to comply with any standards other than the Building Regulations and the optional technical standards. The purpose was to simplify all the technical standards relating to new housing to "reduce burdens and help bring forward much needed new homes." The WMS states that local planning authorities: "should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings." The Home Quality Mark has been devised by the BRE and is described as: "The Home Quality Mark (HQM) is a national standard for new homes, which uses a simple 5-star rating to provide impartial information from independent experts on a new home's design, construction quality and running costs." This is the BRE's attempt to reintroduce the Code for Sustainable Homes on the sly. Its specification by local authorities as a policy requirement conflicts directly with the aim of the WMS of 25 March 2015. Reference to the Homes Quality Mark should be deleted from the plan. The government has said in the WMS, that "if, in the light of experience in implementing this policy statement, the government considers that it is not being accorded sufficient weight by planning authorities, we will consider bringing forward new legislation to secure implementation."			We accept that the Written Ministerial Statement sought to prevent local planning authorities from requiring developers to comply with any standards other than the building regulations and the optional technical standards. However, the policy does not require the Home Quality Mark to be met - it encourages developments to do so. We recognise that the purpose of the Written Ministerial Statement was to reduce burdens to encourage development to come forward; development has been coming forward in Tower Hamlets and we are not of the view that this will impact on development coming forward. We also consider that in light of the density of development coming forward in Tower Hamlets, it is locally important to ensure it is of the highest quality in order to ensure development is sustainable.

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1033272	James Stevens	Home Builders Federation Ltd	LP808	PART 3: POLICIES, 4.24 Paragraph	No	Effective			The Plan is unsound because it does not adequately provide for the needs of older people. It is understood by the government that the needs of older people are being neglected by the planning system. A recent report by Demos for the HBF (November 2017) identifies that the housing crisis affects not only the young, but older people too. It is estimated by the report that England needs 30,000 older people's homes a year. In its Housing White Paper the government announced that it would introduce guidance for local planning authorities on how their development plan documents should meet the needs of older and disabled people. The guidance will place clearer expectations on planning to meet the needs of older people. In the meantime, this version of the Tower Hamlets Local Plan could do more to support the building of homes for older people, including extra care homes, assisted living homes, and retirement homes. The London Plan establishes indicative strategic benchmarks in Table A5.1. This indicates that Tower Hamlets needs to provide 70 specialist homes for older people a year, and it breaks this down between private sale, intermediate sale and affordable rent. The Tower Hamlets Local Plan should refer to this indicative benchmark, and we recommend that the policy is re-drafted so that the local authority will consider schemes for older peoples' housing favourably, especially if the Council has failed to achieve its indicative benchmark in any one of the past five years. We suggest: "The Council will operate a presumption in favour of schemes for older peoples' housing where the Council has failed to match its indicative benchmark of 70dpa in any one of the previous five years."			The policy has been drafted considering the GLA benchmark - this is referenced in supporting text (paragraph 4.50). It is also interesting to note that the new London Plan indicates a lower need of 45 units per year. The policy is drafted positively and supports the delivery of older people housing. Existing units are protected and the policy only requires new developments to meet limited requirements, which are there to ensure the housing delivered meets local needs and is of a high standard, which we consider to be important considerations in the delivery of older people housing.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP128	PART 3: POLICIES, 4.26 Paragraph	No	Effective			Attached shows the numbers of estates across LBTH. A number, like Robin Hood Gardens (Blackwall Reach) and New Union Wharf are currently being re-developed. Estate regeneration proposals have typically raised considerable fears, resistance and anxiety among residents over fears that they will lose their homes and be forced out of London. The Neighbourhood Plan, submitted by the Forum on the 25th October 2017, provides residents with more leverage in the process, not least, in Section 8.3, Policy ER1, which provides for the right to accept or reject regeneration proposals. We believe actively involving residents is the most sustainable method of developing estates.	Yes		Policy D.H2 (parts 5 and 6) outline the council's approach to ensuring estate regeneration meets the needs of the existing residents. This includes undertaking thorough and inclusive consultation. Supporting text (paragraph 4.39) references the Good Practice Guide to Estate Regeneration and require estate regeneration applications to follow its guidance.

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1033272	James Stevens	Home Builders Federation Ltd	LP810	PART 3: POLICIES, 4.26 Paragraph	N/A			We recommend that this part of the policy is deleted. This is a sensitive issue and the HBF is leading the work in this area on behalf of the house building industry. However, this is still work-in-progress. Until the Mayor of London and the house building industry has agreed something that may be acceptable to both sides, it would be inappropriate for the Council to specify any restriction on sales, even if it was voluntary. At present the wording of the policy is imprecise and it would be unclear to the applicant what s/he is expected to do to comply with it, or how the Council should respond to an application. Therefore, what might appear to be voluntary could easily be turned into a mandatory by development management team at the Council. The HBF and the GLA are clear that any protocol that is agreed that is designed to encourage sales to specified groups would have to be voluntary. It therefore has no place in planning policy				This policy is considered appropriate and deliverable. Supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the Mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas. The policy acknowledges that a replacement scheme may emerge and the policy enables this to be the mechanism, through which the objective is achieved. We consider the policy strikes the correct balance between clarity and flexibility.

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1142661	Abdul Basit		LP552	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			Affordability is a major concern in our Area Current affordable terms and policies are no where near the actual affordability; this plan should introduce a policy in way of ensuring what is affordable in terms of Tower Hamlets average income of £22000.00 per annum But we are particularly cautious about the reference of "Estate Regeneration" Although there has been a leak of the One Housing Group's "Project stone" it cannot be an indication to "Estate Regeneration" and it cannot be counted in for the ambitious target that the Council has took on from the GLA Affordable Housing should be considered without the "Estate Regeneration" and therefore the reference to any "Estate Regeneration" should be taken out of the Local Plan Policy D.H2: Affordable Housing 6. Major developments and estate regeneration schemes are required to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities. This is a common practice and the policy does not bring anything new to protect and ensure the confidence of the current residents living within these effected area. The new local plan should ensure that the residents voice is heard in a more democratic way then that of the consultation or survey Like Robin Hood Gardens (Blackwall Reach) and New Union Wharf are currently being re-developed. Estate regeneration proposals have typically raised considerable fears, resistance and anxiety among residents over fears that they will lose their homes and be forced out of London. The Neighbourhood Planning Forum submitted on the 25th October 2017 provides residents with more leverage in the process not least in Section 8.3, Policy ER1, which provides for the right to accept or reject regeneration proposals by vote. We believe actively involving residents is the most sustainable				The local plan seeks to deliver a strategic target of 50% of homes to be affordable, with sites over 10 units providing a minimum of 35%. Of these affordable homes the majority will be for affordable rent at levels affordable to local residents on average incomes. The Local Plan is a 15 year plan. It is highly likely that there will be estate regeneration schemes taking place in the borough over that period. There are a number of estate regeneration schemes already in the planning system, including Blackwall Reach and Chrisp Street. Removing the policy from the plan would reduce the ability for the council to direct how estate regeneration is carried out and limit the council's ability to ensure that affordable housing, open space and community facilities are all protected. We do not consider it possible for the planning system to require ballots before proceeding to assess a planning application. This would require an addition to the Local List (the requirements a planning application has to meet in order to be validated). Requirements on the Local List have to meet their own tests (Paragraph: 040 of the Making an Application PPG) and it is considered that requiring a local ballot would not pass these tests. In addition, the Planning system already has a consultation requirement and we consider it would be viewed as onerous for an estate regeneration schemes to be required to pass a stricter approval test than other schemes. The policy explicitly already requires the delivery of like for like replacement affordable housing. Part 5b. Please note: the numbering of the policy contains errors. This will be rectified.

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								<p>method of developing estates; and the best way to get their mandate is by offering them a vote which the plan fails to include As mentioned we are particularly anxious on the mention of "Estate Regeneration" as there isn't any application or consultation on any such regeneration on the IoD or throughout Tower Hamlets; by having this on the plan it is suggesting that there is one in the pipe line therefore it is an untrue assumption and also inviting developers to a regeneration in the future; this makes the plan very unsound. The Council may argue that they also have advocated to a "Like-for-Like" option on the local plan; but that is only as evidence and supplementary document and not policy. If the council is to keep this policy on the "Estate Regeneration" then they ought to add the "Like-for-Like" option on the policy Most of our members are elderly and would not able to buy into the new properties on the regenerated area – there should be some protection for a like for like for the elders who cannot get mortgage or have savings; it would not be fair to propose any other alternatives</p>				

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1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP658	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No				Estate Regeneration Policy D.H2: Affordable Housing 6. Major developments and estate regeneration schemes are required to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities. This is a common practice and the policy does not bring anything new to protect and ensure the confidence of the current residents living within these effected area. The new local plan should ensure that the residents voice is heard in a more democratic way then that of the consultation or survey Like Robin Hood Gardens (Blackwall Reach) and New Union Wharf are currently being re-developed. Estate regeneration proposals have typically raised considerable fears, resistance and anxiety among residents over fears that they will lose their homes and be forced out of London. The Neighbourhood Planning Forum submitted on the 25th October 2017 provides residents with more leverage in the process not least in Section 8.3, Policy ER1, which provides for the right to accept or reject regeneration proposals by vote. We believe actively involving residents is the most sustainable method of developing estates; and the best way to get their mandate is by offering them a vote which the plan fails to include As mentioned we are particularly anxious on the mention of "Estate Regeneration" as there isn't any application or consultation on any such regeneration on the IoD or throughout Tower Hamlets; by having this on the plan it is suggesting that there is one in the pipe line therefore it is an untrue assumption and also inviting developers to a regeneration in the future; this makes the plan very unsound. The Council may argue that they also have advocated to a "Like-for-Like" option on the local plan; but that is only as evidence and supplementary document and not policy. If the council is to keep this policy on the "Estate Regeneration" then they ought to add the "Like-for-Like" option on the policy Note: No soundness test undertaken	Yes		The Local Plan is a 15 year plan. It is highly likely that there will be estate regeneration schemes taking place in the borough over that period. There are a number of estate regeneration schemes already in the planning system, including Blackwall Reach and Chrisp Street. Removing the policy from the plan would reduce the ability for the council to direct how estate regeneration is carried out and limit the council's ability to ensure that affordable housing, open space and community facilities are all protected. We do not consider it possible for the planning system to require ballots before proceeding to assess a planning application. This would require an addition to the Local List (the requirements a planning application has to meet in order to be validated). Requirements on the Local List have to meet their own tests (Paragraph: 040 of the Making an Application PPG) and it is considered that requiring a local ballot would not pass these tests. In addition, the Planning system already has a consultation requirement and we consider it would be viewed as onerous for an estate regeneration schemes to be required to pass a stricter approval test than other schemes. The policy explicitly already requires the delivery of like for like replacement affordable housing in part 5b. NB numbering of the policy contains errors. This will be rectified.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP651	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No				Policy D.H2: Affordable housing Affordability is a major concern in our Area Current affordable terms and policies are no where near the actual affordability; this plan should introduce a policy in way of ensuring what is affordable in terms of Tower Hamlets average income of £22000.00 per annum But we are particularly cautious about the reference of "Estate Regeneration" Although there has been a leak of the One Housing Group's "Project stone" it cannot be an indication to "Estate Regeneration" and it cannot be counted in for the ambitious target that the Council has took on from the GLA Affordable Housing should be considered without the "Estate Regeneration" and therefore the reference to any "Estate Regeneration" should be taken out of the Local Plan Note: No	Yes		The Local Plan seeks to deliver a strategic target of 50% of homes to be affordable, with sites over 10 units providing a minimum of 35%. Of these the majority will be for affordable rent at levels affordable to local residents on average incomes. The Local Plan is a 15 year plan. It is highly likely that there will be estate regeneration schemes taking place in the borough over that period. There are a number of estate regeneration schemes already in the planning system, including Blackwall Reach and Chrisp Street. Removing the policy from the plan would reduce the ability for the

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									soundness test undertaken			council to direct how estate regeneration is carried out and limit the council's ability to ensure that affordable housing, open space and community facilities are all protected.
1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP467	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Effective			The wording of Policy D.H2 part 1 is not effective as it is not flexible over the plan period to take account of changing circumstances in the borough and within different character areas of the borough. Policy DH.2 requires a 70% rented and 30% intermediate tenure split. This is too inflexible and will not allow variations in tenure split to reflect location, site characteristics, viability and the passage of time. In accordance with the NPPF Paragraph 50, 'Local planning authorities should plan for a mix of housing And identify the size, type, tenure and range of housing that is required in particular locations ...' . NPPF (Paragraph 14) goes on to state that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. Part 3 of this policy relates to the mix of private dwellings as well as affordable housing. As the title is 'Affordable housing' the mix of private units should not be included in this policy. The current wording of the policy does not provide flexibility to address changing needs within the borough. In order to make policy D.H2 Sound the following amendments are proposed: '1. Development is required to maximise the provision of affordable housing and DELETE <In accordance with a > INSERT <will have regard to the> 70% rented and 30% intermediate tenure split. INSERT <The precise affordable housing split will be determined by the particular circumstances, local housing need, characteristics of the site and of the development.> Part 3 of the policy should be removed and be included as supporting text to the policy to provide flexibility in the plan in accordance with national policy.			Justification for the 70:30 split is contained with the SHMA 2017 which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor of London's position in relation the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. It is acknowledged that it is confusing to refer to the policy as a affordable housing policy and include market housing requirements. We propose a minor modification to rename the policy, as follows: Policy D.H2 Mixed and Balanced Communities The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.

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1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP331	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Positively prepared; Justified			This policy should acknowledge that development is required to maximise the delivery of affordable housing on site, subject to viability. The London Plan proposes a tenure split of 60% rent and 40% intermediate. The Council should demonstrate why it considers that a split of 70% and 30% is more appropriate. Part 2 b of the policy should accept that off-site affordable housing can be considered where it is not practicable or feasible to provide affordable housing on site. Part d of the policy notes that where housing development has been permitted and the permission is either subsequently amended to provide more units, or the existing development is extended to provide more units by the granting of a new permission on the same or an adjoining site which is physically or functionally link; the new units will be considered as part of the existing development and the affordable housing calculation for the new units will reflect the whole development. The wording of the policy should be updated to make it clear that this is only triggered on planning permissions that have not yet been implemented. The policy should also acknowledge that if additional affordable housing is required then it should be dealt with by way of a payment in lieu when on-site provision is not possible. Part 3 of Policy D.H2 requires development to provide a specified affordable housing mix. Presently, there is no flexibility in this policy to take into account site specific or location constraints that impact on the suitability of a site to provide the desired mix. Often sites are not suitable for family housing. The policy ought to be revised, for developments to meet the target housing mix subject to site specific constraints.			Justification for the 70:30 split is contained with the SHMA 2017 which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor of London's position in relation to the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. Part 2bi already states: is not practical to provide affordable housing on site. This change is therefore not considered necessary. The policy is not only for permissions which have not been implemented. LBTH has successfully won appeal cases which have applied the incremental development policy to a new development which is physically or functionally linked to an existing (implemented) development. The purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments and there is no incentive to build schemes in a piecemeal, inefficient and disruptive fashion. As such, where they met the requirements of policy D.H2c or policy S.H1.2aii, they could provide financial contributions. The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.

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1142692	Cubitt Property Holdings Ltd		LP599	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			The policy notes that development is required to maximise the delivery of affordable housing on-site. The delivery of affordable housing from developments should be the maximum reasonable in accordance with the advice in the NPPF and this should be acknowledged within the policy. The London Plan proposes a tenure split of 60% rent and 40% intermediate. The Council should demonstrate why it considers that a split of 70% and 30% is appropriate. The policy notes that a minimum of 50% affordable housing must be provided overall (subject to viability). The current wording is confusing as the use of "minimum" implies that this is the lowest level of affordable housing that can be delivered. This is not the case as the level of affordable housing is determined on viability. The policy should note that the Council has a target of 35% - 50% affordable housing but this is subject to viability				Justification for the 70:30 split is contained with the SHMA 2017 which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor of London's position in relation the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. The 50% refers to the affordable housing requirement where developments seek to delivery affordable housing off-site. The 35% requirement is for developments who seek to deliver affordable housing on site. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit. The off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability.
1143353	Greenland Hertsmer e (London) Ltd		LP865	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			We acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market.				We welcome acknowledgement of the importance of affordable housing.
1143156	Hondo Enterprises	Hondo Enterprises	LP769	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			This policy should acknowledge that development is required to maximise the delivery of affordable housing on site, subject to viability. Part 2 (b. i) of the policy should accept that off-site affordable housing can be considered where it is not practicable or feasible to provide affordable housing on site. Part 3 of Policy D.H2 requires development to provide a specified affordable housing mix. Presently, there is no flexibility in this policy to take into account site specific or location constraints that impact on the suitability of a site to provide the desired mix. Often sites are not suitable for family housing. The policy ought to be revised, for developments to meet the target				Paragraph 4.29 links the affordable housing requirements to strategic policy S.H1 which outlines expectations in relation to affordable housing. Part 2bi already states: is not practical to provide affordable housing on site. This change is therefore not considered necessary. The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing

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								housing mix subject to site specific constraints.				needs.
1033272	James Stevens	Home Builders Federation Ltd	LP804	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Consistent with national policy			The policy is unsound in setting an overall target of requiring 50% of all new homes to be affordable. This is not supported by the evidence base. The Council's evidence base indicates that it will be impossible in almost all circumstances for the Council to achieve 50% affordable housing. We find it difficult to see how the Council has translated the evidence as justifying an overall rate of 50% affordable housing. Perusal of the results against the various typologies and benchmark land values (pages 34 to 57 of the Viability Report) shows that only rarely can a scheme support 50% affordable housing and definitely not when the Council's and the London Plan's higher energy efficiency targets are factored into the viability equation (the Base Costs, CIL, S106, SUDS, Accessibility and 35% improvement in energy efficiency). One can only conclude that the 50% target is unjustified. The current Tower Hamlet's Local Plan, adopted in 2010, also seeks to achieve 50% affordable housing overall, but has a target of 35%. However, over the last seven years onlyThis suggests that the Council was unrealistic in the past. This is not necessarily because of the affordable housing target: it is possibly a consequence of its cumulative 'asks' of development. It may also be useful to consider the record of delivery. The figures are drawn for the AMRs and we believe they are net completions. According to the AMR for 2011/12 the following total units of affordable housing were provided: 2010/11 353 out of 1,202 net additions = 30% 2011/12 593 out of 903 net additions = 66% The AMR for 2012/13 records the following affordable housing completions: 2012/13 262 out of 1,241 net additions = 21% According to the GLA's London Plan Annual Monitoring Report 2015/16 (Table 2.7, page 31) net affordable housing completions in Tower Hamlets were: 2013/14 213 representing 13% of net supply 2014/15 731 representing 32% of net supply 2015/16 886 representing 36% of net supply It is apparent from this that the Council has struggled to achieve its 35% target in recent years. It was, however, able to secure higher proportions of affordable housing in the recession-hit years of 2010-2013 (particularly in 2011/12), although this was mainly because of the subsidy available to the housing association sector through the HCA that helped to sustain output in those years. Affordable housing delivery is now much more dependent on the private sector and private sales (last year private sector housebuilders were responsible for 39% of affordable homes provided in England). The level of affordable housing supply does appear to be gradually improving in Tower Hamlets. Nevertheless, the figures suggest that it will struggle			Policy S.H1 makes it clear that whilst 50% is the strategic target for affordable housing delivery, the majority of developments are expected to deliver a minimum of 35%. The shortfall will be made up of sites in receipt of grant and those delivered by registered providers and the council.

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									<p>even more to achieve 50%. The figures suggest that a target of 35% would be more appropriate, even if still quite aspirational. Considerable opprobrium is directed at developers for appearing to renege on affordable housing targets. However, if these targets are unrealistic in the first place, then resort to scheme specific viability assessments will be inevitable, and lower rates of affordable housing will tend to have to be accepted by the Council, especially if it is reluctant to forego contributions to things such as health, education, requirements to objectives such as zero carbon, and other community benefits. However, the Council ought not to mislead residents, and it ought to set realistic targets in the first place. The Harman guidance titled Viability Testing Local Plans (2012) makes this point on page 17 (properly done, local plan viability assessments should “avoid situations where communities are left disappointed that their aspirations have not been matched by delivery”). While we appreciate the theory behind the idea that establishing aspirational targets in the local plan will help embed these costs in the land value – i.e. they will compel landowners to lower their expectations as to the type of monetary returns they can expect from releasing their land for development – this may take a long time to achieve in practice, if at all. The Council will be aware of the reminder in the NPPF that plan-makers will need to provide competitive returns to a willing landowner and willing developer. In the short-run, the Council may be compelled to negotiate on every application if it sets an aspirational affordable housing target. This will cause delay and cause public resources to be tied-up in the development management system. This would appear contrary to the principles of the plan-led system, as articulated in paragraphs 14, 15 and 17 of the NPPF; whereby development proposals that accord with the development plan should be approved without delay.</p>			

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624580	Jason Larkin	Canary Wharf Group Plc	LP515	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Positively prepared; Justified; Consistent with national policy			With reference to Part 1 of the draft policy, there is no consideration of flexibility in the rented:intermediate split to allow developments to meet local housing need and ensure mixed and balanced communities. Furthermore, there is no consideration of site specific circumstances such as high density housing or viability constraints and how these may impact on the affordable housing split. Wording to this effect should at least be included in the supporting text. Part 2 (d) sets out an approach to affordable housing if schemes are amended following approval via s73 or a new application. It is not clear as currently worded how viability is considered and the policy needs to be amended to accord with the GLA 'Affordable Housing and Viability SPG' (2017) section on Scheme Amendments (2.14 - 2.16). It is not clear how this policy would promote rather than constrain residential development (London Plan policy 3.3) and therefore as it stands not effective. Part 2 (d) considers unit numbers when amendments are made to a scheme following approval or a new application. Unit numbers cannot be considered in isolation, both floorspace and habitable rooms should be considered consistent with the GLA SPG. For example where no additional floorspace is proposed it would be unreasonable to burden a scheme finances where an element of smaller unit are delivered. Part 3 sets out the required unit mix by bedroom size. This has changed significantly from the current adopted unit mix. With adjustments to both affordable rented and intermediate tenures. Whilst it is stated that this is evidenced through the updated 'SHMA' (2017) this document shows very little supporting evidence for such change and therefore not justified. We would also question why a market unit size mix has been included within an affordable housing policy. Our affordable housing consultants Quod have undertaken a review of the Council's updated 'SHMA' and note the following comments. The model to determine future affordable housing need is based on analysis of housing benefit claimants (see paras. 3.87 to 3.88 and Figure 29 of the SHMA). It does not undertake analysis of comparing local incomes to housing costs for newly forming households as required by the NPPG in ID 2a-105, but rather uses affordability percentages calculated using "data published by DWP about housing benefit claimants alongside detailed information from the 2011 Census" (para. 3.88 of the SHMA). Not only does this method not accord with the NPPG requirements for an assessment of local income to housing costs for newly forming households, it assumes that only those claiming housing benefit can be in need of affordable housing. This is a flawed concept for a number of reasons: 1. Limiting the definition of affordable housing need to persons in			It is not considered that the SHMA is flawed or provides insufficient evidence to support the housing mix policy. The following outlines the evidence and approach the SHMA takes and why it is sufficient and in keeping with the NPPF. The SHMA does use the degree of housing benefits claims as a proxy for those whose needs are not met by the market. However, this is not the sole input used to determine affordable housing need. Section 3 of the SHMA provides a detailed breakdown of how the affordable housing need has been calculated. This is composed of two elements: Current unmet need and projected future affordable housing need. Figure 28 lists the component groups of current unmet need – this does include concealed households, overcrowded households and those living in unsuitable accommodation. Figure 34 lists the component groups of projected future affordable housing need. The calculation for those households projected to be in future affordable housing need is driven by two key components, trends in the uptake of housing benefit and also ORS count all households who enter affordable housing as being in need, and not just those households who receive housing benefit. Therefore, all households entering social rent are assumed to be in affordable housing need. This means that projected future need for affordable housing is calculated on the basis of projecting forward past rates of entry to affordable housing and also past rates of uptake of housing benefit in the private rented sector. Therefore, any household who is deemed to either be in affordable housing need and granted an affordable home, or any household who the government have deemed should receive support with their housing costs are counted as part of the calculation for projecting future affordable housing need. Figure 35 brings together these two elements and provides a full overview of the different components of the affordable housing need figure. It is clear that need in relation to housing benefit is only one input of many. In addition, figure 47 assesses affordable housing need against different types of affordable housing, both where

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								<p>receipt of housing benefit is contrary to the definition of affordable housing in the NPPF (Annex 2 Glossary). This is defined as “social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.” 2. It is contrary to the requirement to assess needs in the NPPG which expressly includes dealing with those who cannot afford to rent or buy market housing, but does not appear to confine it to housing benefit eligible claimants. 3. The approach excludes large amounts of people who are in need of affordable housing, but who are unable to buy a house and will clearly not be eligible for housing benefit. Those ineligible for housing benefit include those living with a family member who would otherwise be recognised as young people seeking to move out but who are unable to afford to do so. Furthermore those who have savings of over £16,000 are ineligible for housing benefit. Under the Council’s methodology those who have saved more than £16,000 you lose your entitlement to housing benefit and therefore fall outside of their definition of someone in affordable housing need, yet you are still unable to afford to buy a property under the NPPF definition. 4. It is contrary to established practice by only covering those with the most acute housing needs ORS assert that one cannot actually calculate who is in need unless it is by reference to those known to be claiming housing benefit. This is however contradicted by the well-established practice and the approach in a number of SHMA’s behind adopted post NPPF Local Plans. On this basis the SHMA does not correctly calculate affordable housing need, the full Objectively Assessed Housing need cannot be known from the current evidence. The SHMA is therefore flawed on this basis alone. Quod have also considered the Full Objectively Assessed Need for Housing, Size and Tenure Mix across the borough as set out in Figure 46 of the updated SHMA; this supports the proposed bedroom unit mix proposed within part 3 of Policy SH2 Affordable Housing. Para. 5.27 of the Updated SHMA states that “the evidence points to a high need for 2 bedroom properties in the market sector and 2 and 3 bedroom properties in the affordable housing sector”. We have found no other supporting evidence provided other than reference to overcrowding in the affordable sector and changing household types in the market sector. Furthermore Quod have reviewed the affordability of the intermediate housing 3 and 4 bedroom units on the basis of either an intermediate rent capped at £60,000 in accordance with the GLA AMR and shared ownership capped at the GLA AMR. Quod consider that both the intermediate rent and shared ownership tenure are unaffordable in line with</p>			<p>households receive benefits and where they do not. It is clear that the affordable housing need also includes those who would not receive housing benefit, but whose needs cannot be met in the market.</p> <p>It is important to note that the SHMA does not rely upon the private rented sector as a means of reducing affordable housing need; instead, it recognises that households in receipt of housing benefit can afford to access suitable housing in the market as they receive a welfare payment specifically for this purpose, so it would be inconsistent with the PPG to count these households as needing affordable housing (ID 2a-024): “care should be taken ... to only include those households who cannot afford to access suitable housing in the market”</p> <p>The SHMA does caution that if this payment was withdrawn, this would have a substantial impact on the affordable housing need; but the Government has not suggested that there is any intention to universally withdraw housing benefit from those households in the private rented sector, and it is included in the Office for Budget Responsibility long-term economic forecasts.</p> <p>In terms of affordability, the HBF’s submission notes that affordable housing is defined as: “social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market” and that NPPG expressly includes dealing with those who cannot afford to rent or buy market housing. The important phrases here relate to the ability to meet needs in the market, which is different to the ability to afford to be an owner occupier. Both the NPPF and NPPG are clear that households which can afford to meet their needs in the market are not in affordable housing need. Therefore, if a household can afford to rent, but cannot afford to buy a dwelling, they are not in affordable housing need. As noted from paragraph 1.19 of the SHMA Update 2017 this may change in the near future when final details of Starter Homes are added to the NPPF and NPPG. A Starter Home is a discount affordable home to own and its inclusion in the NPPF and NPPG would</p>

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								<p>the income requirements set by the GLA. The table below set out a review of the affordability on the basis of £900psf open market values (OMV). It is estimated in some areas that the OMV are significantly higher and therefore could be more unaffordable. On the basis of the minimum 25% initial equity share and 2.75% rent on unsold equity. All minimum unit sizes exceed the £90,000 income thresholds. If the open market value is increased to £1,150psf the income required for a 3b4p unit increases from £95k to £120k. Therefore the bedroom mix for intermediate units is unachievable as currently set out in policy S.H2. Quod have also reviewed the intermediate rent affordability and on the basis of the London Rent Map data for LBTH have shown that intermediate rent is only affordable for 3 and 4 bed units where this is below the £60,000 income threshold. At 60% of market rent all unit types exceed the income threshold on the basis of the borough wide rental values. As shown in the table below. The units need to be discounted to 59% for 3 beds and 36% respectfully. Furthermore if the rents are calculated on a localised level, they can be significantly higher making affordability in more challenging. Therefore intermediate rent is very challenging from an affordability perspective for family sized units, and the level of discount is well below the 80% of market rent definition as set out within the London Plan. The average London Living Rent as set by the GLA in LBTH equates to £1,164 for a 3 bedroom unit and £1,481 for a 4 bedroom unit. This is equivalent to 50% of market rent which could be financially equivalent to an affordable rented product. On this basis we do not consider that the affordable housing need has been calculated on the correct basis given it does not accurately reflect housing need or affordability of intermediate housing. On this basis we do not consider that the bedroom unit mix within policy SH2 is achievable or been prepared on a sound basis. At Attachment 4 we have included evidence prepared by Quod, reviewing the Council's 'Local Plan Viability Assessment' (July 2017) that has been prepared by BNP Paribas Real Estate ("BNPPRE"). Of particular relevance to Canary Wharf Group is the Council's approach to the North Quay site, one of the 16 strategic sites tested by BNPPRE, to assess the potential to viably meet emerging policy requirements of the Local Plan specifically those relating to affordable housing. SEE TABLES IN REPS</p>			<p>require a fundamental revision of both documents.</p> <p>Finally, it is important to note that even if the affordable housing need were to be under-assessed, this would not mean that the OAN would be under assessed. The affordable housing need is a percentage of the OAN. If the affordable housing need were to increase, this would simply represent a large proportion of the whole OAN.</p> <p>Chapter 2 of the SHMA outlined the data sources for the demographic projections. This includes expected household growth numbers, including size of households. This, alongside concealed household, under-occupancy and overcrowding data (outlined in chapter 3) is the basis for figure 46.</p> <p>Applying the ORS Housing Mix Model, when considering the future need for different types of housing, the model assumes that the housing mix needed by households of each household type and age will reflect current patterns. For example, a growth in single person households aged 65-74 will lead to an increase in the need for the type of housing currently occupied by single person households of this age. On this basis, where such households continue to live in family housing despite no longer having a family living with them, this need for family housing will still be counted. Given the lack of a clear mechanism or incentive to encourage many households to downsize then there is very little which any planning authority can do to address under-occupation, but planning policies could seek to develop more properties which are suitable for older persons to move to.</p> <p>The evidence in the SHMA 2015 and SHMA update 2017 supersedes that within previous SHMA. Among other issues to consider was that there was a fundamental revision of the definition of affordable housing need in NPPG when published in March 2014. In March 2014, the government produced new guidance on conducting housing needs assessments in the form of 'Guidance for Housing and economic development needs assessments'. Paragraph 22-29 of this new</p>

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												<p>guidance covers affordable housing needs and it includes a number of significant changes since the 2007 SHMA Practice Guidance which underwrote previous assessments in Tower Hamlets. The HBF are therefore correct in assigning some of the changes to the methodological approaches.</p> <p>In particular, the 2007 SHMA Practice Guidance defined affordability as: 'A household can be considered able to afford market house renting in cases where the rent payable was up to 25 per cent of their gross household income.'</p> <p>However, paragraph 22 of the 2014 NPPG states that plan makers should only counting a household as being in need of affordable housing when they are, '...households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market.'</p> <p>There is a very clear distinction between these two definitions of affordability, with the 2007 SHMA practice guidance offering a very strict test of affordability based upon a fixed percentage of income spent on rents.</p> <p>Meanwhile, the 2014 NPPG offers a much looser definition of affordability based upon not being able to afford market housing. In practice this change in emphasis has led to fewer households being considered as being in housing need based upon affordability.</p> <p>Added to this effect, the Localism Act 2011 provided new opportunities for local authorities to reconsider their local housing needs, in particular their housing registers. Since 2011, housing registers across the country have typically fallen as local authorities have re-evaluated their policies locally.</p> <p>The combined impact of these changes is that households who may have appeared to be in affordable housing need in an area in 2013 will now not appear to require affordable housing. This doesn't necessarily reflect a change in their circumstances; simply that definitional changes imply that households who were previously counted as</p>

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												<p>being in affordable housing need are no longer counted as such. This largely affects the need for intermediate housing where households who can afford to rent privately by spending more than 25% of their gross income on rent are no longer counted as being in affordable housing need. This does not mean that these household would not consider shared ownership or low cost home ownership products, only that their needs are currently counted in the market housing sector.</p> <p>The GLA SHMA 2013 utilised the pre-NPPG definitions of affordable housing need and also accounted for market signals in a manner which is different to any other SHMA in England. In general, market signals have been addressed in SHMA either through a direct percentage uplift, such as the 20% applied in the Tower Hamlets SHMA update, or through adjustments to household headship rates. The GLA SHMA 2013 used data from the 2011 Census and the English Housing Survey to assess the number of current and prospective households who did not have a suitable property at the moment. This placed a heavy emphasis on young single households who require small dwellings of their own, rather than properties to share. However, benefit reforms mean that single persons under the age of 35 years cannot receive housing benefit at anything other than the shared living rate, so they cannot afford to meet the costs of a private rented property if they require benefit support. While the Tower Hamlets SHMA 2015 sought to replicate the GLA SHMA 2013 for consistency, the 2017 SHMA update moved away from this approach to the one more generally used by ORS in the rest of England.</p> <p>A further change which occurred between the Tower Hamlets SHMA 2015 and the SHMA update 2017 was that the GLA update their population and household projections every year. The SHMA 2015 and SHMA update 2017 therefore used different up to date GLA projections for the core modelling. This is particularly important because the 2015 SHMA utilised 2011 based GLA projections which included the use of CLG headship rates from their 2012 based</p>

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												<p>projections. However, the 2017 SHMA update used the 2016 round GLA projections which are 2015 based and utilise the 2014 based CLG headship rates. This again has impacts on the size and tenure mix across Tower Hamlets,</p> <p>Therefore, in summary, a combination of definitional changes in NPPG, a change in modelling away from the GLA SHMA 2013 approach to the standard ORS model and data changes between the two studies explain the variation in size and tenure mix between the SHMA 2015 and SHMA update 2017.</p> <p>This policy approach reflects the new GLA affordable housing products and seeks to deliver intermediate units which are more affordable via London Living Rents. The intermediate SHMA need was calculated using the London Living Rent levels and need therefore reflects their greater affordability. Policy D.H2 and supporting text (paragraph 4.30) explicitly prioritise large intermediate units for London Living Rent and indicate that units whose market value is over 600,000 are unsuitable for shared ownership. i.e. the policy agrees with the evidence that is presented in this representation which demonstrates that larger shared ownership intermediate units are not affordable. In relation the second review in the representation, we acknowledge that supplying intermediate living rent products is more expensive for developers than shared ownership products, but this has been viability tested and found viable.</p>

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719346	John Turner	Ballymore Group	LP267	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No				<p>Policy D.H2 – Affordable Housing In line with the content of the NPPF policy D.H2 should acknowledge that development is required to maximise the delivery of affordable housing on site, subject to viability. The London Plan identifies tenure of 60% rent and 40% intermediate as being appropriate while the Council proposed a split of 70% and 30% as more appropriate. It would be beneficial for the Council to justify why they have chosen to differ on their approach to tenure especially given the potential consequential impacts of this approach on viability. As stated previously in our representations the Council have indicated they are willing to accept housing mixes differing to those contained within policy should it result in additional affordable housing. Should the Council wish to continue with this approach further information regarding the methodology should be included within the justification guidance for the policy. Policy 2.d states that the Council will seek to renegotiate the affordable housing provision on sites which are amended via a variation of the existing planning consent for more than 10 units or new proposal which intrinsically links to the already consented development. As stated in our previous comments it is acknowledged that any uplift in value achieved for a site should be subject to affordable housing. However the review of the consented developments must account for the deliverability associated with financing the development. Any renegotiation on a site wide basis could have wide reaching implications for developers beyond that of simply maximising the efficiency of the development. Paragraph 173 of the NPPF states that “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. [...] To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. It is widely accepted that the planning process and the complicated procedural regulations surrounding it are often a barrier to the delivery of housing. Central Government policy recognises the barriers to development and is seeking to decrease the red tape associated within planning for new schemes. The above introduction of additional procedure will result in more barriers to development further slowing the delivery of schemes and thus be counter intuitive to the Councils desire to deliver much needed additional homes. In addition the review of development appraisals for sites would in certain circumstances provide risk to funding arrangements</p>	Yes		<p>Justification for the 70:30 split is contained with the SHMA 2017 which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor of London’s position in relation the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. The housing mix is based on an up to date SHMA and reflects the borough’s objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that ‘Developments may be required to meet updated identified needs as a result of monitoring’, which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs. We will seek to explore further the relationship between the housing mix requirement and the viability threshold approach in the examination. The purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments. Incremental developments would still be able to provide viability assessments to demonstrate delivery constraints where required, so this policy adds no additional burden to that which would apply to any residential development. Paragraph 4.29 links the affordable housing requirements to strategic policy S.H1.</p> <p>Policy S.H1 (section 4.18 of the supporting text) makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified by through adding wording to this paragraph:</p> <p>Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document.</p> <p>The SPD will be added to the evidence links</p>

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									and jeopardise the delivery of new sites. In response it would be entirely possible that a developer chooses not to maximise their site, thus not contributing to the Councils targets, as the risk associated with policy 2.d is too great. We therefore propose that the Council amend policy 2.d to relate solely to the uplift in development quantum. This approach could assess the viability implications and economies of scale across the site but only apply to the additional units. This enables a clear and transparent approach within the development plan process without jeopardising the timely delivery of housing. Finally we consider that the Core Strategy should reference Key Requirement 2 from the Councils Development Viability Supplementary Planning Document. Within the SPD developers who provide at least 35 per cent affordable housing without public funding and as a policy compliant mix are not required to submit a viability assessment to the Council. Given the importance of this policy we consider it should be contained within Policy DH2 of the Local Plan. With the approach clearly outlined by the Council it is hoped it will encourage the delivery of additional affordable housing with the Borough.			relating to policy S.H1 and D.H2.
1131148	LB Hackney	LB Hackney	LP574	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	Yes		We support Policy D.H2 which promotes maximum provision of affordable housing and welcome the introduction of the dwelling mix table within this policy indicating the varying needs for different sized units across different tenures within new developments to meet local housing needs. In response to Tower Hamlets' Regulation 18 consultation, Hackney raised the point that omitting to set out a clear position on preferred dwelling mix could potentially result in an under-delivery of family sized					Support for housing mix policies are welcomed.

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							housing, for which there is known to be a particular need across our shared housing market area. We therefore welcome this change and consider that this supports the 'soundness' of Tower Hamlets' Plan.					
1054252	Londone wcastle	Londone wcastle	LP622	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Consistent with national policy			This policy should acknowledge that the requirement to maximise the delivery of affordable housing on site, is subject to viability. The draft Local Plan proposes an affordable tenure split of 70% social rent and 30% intermediate. The London Plan proposes a tenure split of 60% social rent and 40% intermediate. The Mayor's Affordable Housing and Viability SPG also encourages a more flexible approach to tenure. It is important that the Local Plan also encourages a flexible approach to tenure, based on site-specific circumstances and viability. We believe flexibility of tenure will be essential if overall housing delivery targets are to be achieved. Part 2 b of the policy should accept that off-site affordable housing, or contributions to off-site affordable housing, can be considered where it is not practicable or feasible to provide affordable housing on site. Part d of the policy notes that where housing development has been permitted and the permission is either subsequently amended to provide more units, or the existing development is extended to provide more units by the granting of a new permission on the same or an adjoining site which is physically or functionally link; the new units will be considered as part of the existing development and the affordable housing calculation for the new units will reflect the whole development. The wording of the policy should be updated to make it clear that this is only triggered on planning permissions that have not yet been implemented. The policy should also acknowledge that if additional affordable housing is required and it is viable to do so, then it should be dealt with by way of a payment in lieu when on-site provision is not possible. Part 3 of Policy D.H2 requires development to provide a specified affordable housing mix. Presently, there is no flexibility in this policy to take into account site specific circumstances or location constraints that impact on the suitability of a site to provide the desired mix. The policy ought to be revised, for developments to meet the target housing mix subject to site specific constraints. As set out above, the proposal requirement for affordable housing contributions on sites providing 2 to 10 new			Justification for the 70:30 split is contained with the SHMA 2017 which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor of London's position in relation the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. Part 2bi already states: is not practical to provide affordable housing on site. This change is therefore not considered necessary. The policy is not only for permissions which have not been implemented. LBTH has successfully won appeal cases which have applied the incremental development policy to a new development which is physically or functionally linked to an existing (implemented) development. The purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments and there is no incentive to build schemes in a piecemeal, inefficient and disruptive fashion. As such, where they met the requirements of policy D.H2 (2c) or policy S.H1 (2aii), they could provide financial contributions. The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community.

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									residential units against a sliding-scale target is not aligned with the NPPF and should be removed from the draft Local Plan and should be deleted. As a result, we do not consider the draft plan to be consistent with national policy.			<p>Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.</p> <p>Affordable housing contributions from small sites is considered necessary due to the role smaller sites plays in delivering housing (which is due to grow following new London Plan approach to small sites) and the affordable housing need in the borough. It has also been tested and found viable in the Local Plan Viability Assessment. The ability for boroughs to establish small sites affordable housing policies following the written ministerial statement has been established in a number of Local Plan Examinations. Further details on the policy and approach taken are available here: Small Sites Affordable Housing Contributions Paper (2017).</p>
1142716	Lyca Group		LP645	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			<p>We acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market. Part 1 of policy D.H2 states that: Development is required to maximise the provision of affordable housing with a 70% rented and 30% intermediate tenure split. We suggest the policy wording clarifies whether this 70:30 split refers to habitable rooms or units. Historically, tenure split may have been based on units, but Part 2 a of Policy D.H2 indicates that habitable rooms will be used for affordable housing calculations, and the Mayor's Affordable Housing and Viability SPG adopted in August 2017 also uses habitable rooms as a measure. Part 2 b states that: c. Off-site affordable housing will only be considered in circumstances where it: i. is not practical to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all</p>			<p>The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.</p> <p>'Higher level' is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and</p>	

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								of the sites, including a. a higher level of rented family homes. We suggest that the wording of this policy is clarified, to enable the provision of the greatest quantum of high quality affordable housing to meet need throughout the Borough. There may be specific cases where even if parts i) ii) iii) are not met a 'better outcome', enabled by iv) may be preferable in specific site circumstances. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. The text amendments suggested below allow this flexibility: ...iii. can provide a minimum of 50% affordable housing overall, subject to viability; DELETE<and> insert <or> iv. can provide a better outcome for all sites, including a higher level of rented family homes. In relation to part 2) b) vi) we request wording clarifications to provide a clearer understanding of the terms "higher level" (is this referring to habitable rooms or units?) and "rented family homes".					delivers the right range of housing products to meet locally assessed needs. As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms. In relation to rented family homes we will amend this wording to state: policy D.H2 (2biv) can provide a better outcome for all of the sites, including a higher level of affordable rented family homes.
1053881	Sally Styles	C M A Planning Ltd	LP95	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Justified			D.H2 Comment: Previous comments in respect of Table 3 associated with Policy H2 (as was) have been taken into account in that it is acknowledges that larger intermediate products are unaffordable. However, amendments to this policy now include 45% of intermediate accommodation to be provided, with the supporting text suggesting 3 and 4 bed intermediate units will be London Living Rent products. The affordability remains of concern.	Yes		Within the 30% intermediate requirement, the percentage of family unit provision has increased. This is as a result of the SHMA 2017 assessment which reflects the new Mayor of London intermediate tenure (London Living Rent) which is more affordable to local residents; it also includes a limit to the value of homes which would be suitable for intermediate shared ownership. The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs	

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP954	PART 3: POLICIES, 4.27 Paragraph	No				Policy D.H2 (Affordable housing) We acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market. Part 1 of policy D.H2 states that: Development is required to maximise the provision of affordable housing with a 70% rented and 30% intermediate tenure split. We suggest the policy wording clarifies whether this 70:30 split refers to habitable rooms or units. Historically, tenure split may have been based on units, but Part 2 a of Policy D.H2 indicates that habitable rooms will be used for affordable housing calculations, and the Mayor's Affordable Housing and Viability SPG adopted in August 2017 also uses habitable rooms as a measure. Part 2 b states that: c. Off-site affordable housing will only be considered in circumstances where it: i. is not practical to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all of the sites, including a. a higher level of rented family homes. We suggest that the wording of this policy is clarified, to enable the provision of the greatest quantum of high quality affordable housing to meet need throughout the Borough. There may be specific cases where even if parts i) ii) iii) are not met a 'better outcome', enabled by iv) may be preferable in specific site circumstances. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. The text amendments suggested below allows for this flexibility: ...iii. can provide a minimum of 50% affordable housing overall, subject to viability; and or iv. can provide a better outcome for all sites, including a higher level of rented family homes. In relation to part 2) b) vi) we request wording clarifications to provide a clearer understanding of the terms "higher level" (is this referring to habitable rooms or units?) and "rented family homes".			<p>The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.</p> <p>'Higher level' is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>In relation to rented family homes we will amend this wording to state: policy D.H2 (2biv) can provide a better outcome for all of the sites, including a higher level of affordable rented family homes.</p>
1143450	Thomson Reuters		LP948	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable	N/A			We acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market. Part 1 of policy D.H2 states that: Development is required to maximise the provision of				<p>The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products</p>

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				housing			<p>affordable housing with a 70% rented and 30% intermediate tenure split. We suggest the policy wording clarifies whether this 70:30 split refers to habitable rooms or units. Historically, tenure split may have been based on units, but Part 2 a of Policy D.H2 indicates that habitable rooms will be used for affordable housing calculations, and the Mayor's Affordable Housing and Viability SPG adopted in August 2017 also uses habitable rooms as a measure. Part 2 b states that: c. Off-site affordable housing will only be considered in circumstances where it: i. is not practical to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all of the sites, including a higher level of rented family homes. We suggest that the wording of this policy is clarified, to enable the provision of the greatest quantum of high quality affordable housing to meet need throughout the Borough. There may be specific cases where even if parts i) ii) iii) are not met a 'better outcome', enabled by iv) may be preferable in specific site circumstances. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. The text amendments suggested below allows for this flexibility: ...iii. can provide a minimum of 50% affordable housing overall, subject to viability; DELETE <and> INSERT <or> iv. can provide a better outcome for all sites, including a higher level of rented family homes. In relation to part 2) b) vi) we request wording clarifications to provide a clearer understanding of the terms "higher level" (is this referring to habitable rooms or units?) and "rented family homes".</p>			<p>to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.</p> <p>'Higher level' is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>In relation to rented family homes we will amend this wording to state: policy D.H2 (2biv) can provide a better outcome for all of the sites, including a higher level of affordable rented family homes.</p>	

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP925	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			<p>Policy D.H2 should acknowledge that development is required to maximise the delivery of affordable housing on site, subject to viability. Part 2 (b. i) of the policy should accept that offsite affordable housing can be considered where it is not practicable or feasible to provide affordable housing on site. Part 3 of Policy D.H2 requires development to provide a specified affordable housing mix. Presently, there is no flexibility in this policy to take into account site specific or locational constraints that impact on the suitability of a site to provide the desired mix. Often sites are not suitable for family housing. The policy ought to be revised, for developments to meet the target housing mix subject to site specific constraints, as below:"1. Development is required to maximise the provision of affordable housing in accordance with a 70% rented and 30% intermediate tenure split. 2. Development is required to maximise the delivery of affordable housing on-site. a. Affordable housing calculations will be based on habitable rooms. b. Off-site affordable housing will only be considered in circumstances where it: i. is not practical INSERT <or viable> to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all of the sites, including a higher level of :rented family homes INSERT< in suitable locations>. c. If a suitable site cannot be found in accordance with part 2(b), exceptional circumstances may apply and payments in-lieu will be considered d. Where a housing development has been permitted and the permission is either subsequently amended (e.g. by means of a variation) to provide more units, or the existing development is extended to provide more units by the granting</p>				<p>Paragraph 4.29 links the affordable housing requirements to strategic policy S.H1 which outlines expectations in relation to affordable housing.</p> <p>Part 2bi already states: is not practical to provide affordable housing on site. The viability of the delivery of affordable housing is addressed in policy S.H1. It is clear that if development cannot meet the viability requirements, this must be evidenced through viability assessments. This change is therefore not considered necessary.</p> <p>The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.</p>

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								of a new permission on the same or an adjoining site which is physically or functionally linked; the new units will be considered as part of the existing development and the affordable housing calculation for the new units will reflect the whole development. 3. INSERT<Subject to the suitability of individual sites and locations,> development is required to provide a mix of unit sizes (including larger family homes) in accordance with local housing need, outlined in the table below: 4. Development which involves the conversion of family homes will only be permitted when a 3-plus bed unit is retained in the new development. Where applicable, the retained family unit should have access to a private garden. 5. Estate regeneration development schemes are required to: a. protect and enhance existing open space and community facilities; a. protect the existing quantum of affordable and family units, with affordable units reprovided with the same or equivalent rent levels.; b. provide an uplift in the number of affordable homes; and c. bring existing homes up to the latest decent homes standard. 6. Major developments and estate regeneration schemes are required to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities. "				
1049487		Ashbourne Beech Property	LP106	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Justified			Policy D.H2. Affordable housing. The provision of affordable housing is to be maximised in accordance with a70% rented and 30% intermediate tenure split. The policy should include the caveat related to viability set out at Policy D.H1. Part 3 of the policy states that a mix of unit sizes, in accordance with local housing need should be provided. Whilst the policy relates to affordable housing, the table included in the policy includes a column for market housing with a split of 1,2 and 3 / 4 bed units. The table should be amended to remove reference to market housing. The policy relates to affordable housing. The market should determine the mix of housing for non-affordable units. Paragraphs 4.27 – 4.39 reinforce that the policy is concerned with affordable housing (not market) and that as such the inclusion of a market unit	Yes		Policy S.H1 addresses the 35% affordable housing requirement on site, and does indicate that this is subject to viability. A viability assessment will be required where developments indicate they are only able to provide less than 35% affordable housing. It is acknowledged that it is confusing to refer to the policy as a affordable housing policy and include market housing requirements. We propose a minor modification to rename policy D.H2 as follows. Policy D.H2: Mixed and balanced communities Affordable housing

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									mix is inappropriate.			The housing mix is based on an up-to-date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
1142493		Berkeley Group	LP403	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No				D.DH2: Affordable housing Part (2) of the policy requires affordable housing to be 'maximised' on site. It is unclear how this relates to the 35% minimum target or viability requirements. This policy needs to make clear that if the 35% target is met viability and review requirements are not engaged as set out in the Mayor of London's SPG. Part (3) of the policy on housing mix should not include, or introduce flexibility on private housing mix, and Intermediate mix should be reviewed with providers. Paragraph D in part (2) should be removed Soundness test: Mix not justified by evidence base. Not deliverable and therefore not effective. Potentially inconsistent with London plan policy and with national policy (on amendment applications).	Yes		Paragraph 4.29 links the affordable housing requirements to strategic policy S.H1. Policy S.H1 (section 4.18 of the supporting text), makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified by through adding wording to this paragraph: Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document. The SPD will be added to the evidence links relating to policies S.H1 and D.H2. The threshold approach doesn't mean that developments aren't encouraged to maximise delivery of affordable housing - developments will still be encouraged to deliver more than 35% affordable housing, especially if they are in receipt of grant etc.The purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments. Incremental developments would still be able to provide viability assessments to demonstrate delivery constraints where required, so this policy adds no additional burden to that which would apply to any residential development. The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.

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1142590		British Airways plc	LP478	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			<p>We acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market. Part 1 of policy D.H2 states that: Development is required to maximise the provision of affordable housing with a 70% rented and 30% intermediate tenure split. We suggest the policy wording clarifies whether this 70:30 split refers to habitable rooms or units. Historically, tenure split may have been based on units, but Part 2 a of Policy D.H2 indicates that habitable rooms will be used for affordable housing calculations, and the Mayor's Affordable Housing and Viability SPG adopted in August 2017 also uses habitable rooms as a measure. Part 2 b states that: c. Off-site affordable housing will only be considered in circumstances where it: i. is not practical to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all of the sites, including a higher level of rented family homes. We suggest that the wording of this policy is clarified, to enable the provision of the greatest quantum of high quality affordable housing to meet need throughout the Borough. There may be specific cases where even if parts i) ii) iii) are not met a 'better outcome', enabled by iv) may be preferable in specific site circumstances. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. The text amendments suggested below allows for this flexibility: ...iii. can provide a minimum of 50% affordable housing overall, subject to viability; DELETE <and> INSERT <or> iv. can provide a better outcome for all sites, including a higher level of rented family homes. In relation to part 2) b) vi) we request wording</p>				<p>The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.</p> <p>'Higher level' is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs.</p> <p>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</p> <p>In relation to rented family homes, we will amend this wording to state: Policy D.H2 (2biv) can provide a better outcome for all of the sites, including a higher level of affordable rented family homes.</p>

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							clarifications to provide a clearer understanding of the terms “higher level” (is this referring to habitable rooms or units?) and “rented family homes”.				
1142035		Hermes Property Unit Trust	LP159	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	Yes		Policy D.H2: Affordable Housing General Comment: The policy should include some text regarding viability considerations if the 35% on-site affordable housing provision cannot be met. This should also apply to other requirements contained within the policy, such as housing types and dwelling mix. We would suggest that Part 1 provides a link back to the Borough’s Housing Strategy, as the tenure split may be subject of change over time. Part B, criteria iii is considered unreasonable, the requirement should be 35% overall. Part C should define ‘exceptional circumstances’ to provide clarity. Part D – each application site should be considered on its merits.		Yes		<p>It is not considered that these changes are required for the following reasons:</p> <p>Policy S.H1 addresses the 35% affordable housing requirement on site, and does indicate that this is subject to viability. A viability assessment will be required where developments indicate they are only able to provide less than 35% affordable housing.</p> <p>The split between rented and intermediate housing has been assessed in the SHMA, which demonstrates that there is only a 17.5% intermediate housing need in the borough. In order to aid delivery the balance has been shifted to increase the intermediate provision, demonstrating flexibility within the policy. It is important to note that the GLA Affordable Housing and Viability SPG revises the Mayor’s position in relation the intermediate and social mix to require boroughs to provide, at least 30% low cost rent, at least 30% intermediate and the remaining 40 per cent to be determined by the LPA. It is therefore required that a split is defined in the Local Plan. We do not consider further flexibility is required given the large, well-evidenced need for affordable housing.</p> <p>The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.</p> <p>In this instance, exceptional circumstances cannot be defined as they will have to be assessed on a case by case basis.</p> <p>When development is incremental, it is by its nature linked to another application so has to be judged alongside it.</p>

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1033284	Unknown	One Housing Group	LP386	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	Yes		These representations relate to One Housing's extensive interests across Tower Hamlets as one of the largest housing association in the Borough, managing over 5,000 homes. This includes approximately 4,000 homes in the Isle of Dogs and South Poplar area. One Housing's primary aim is "to help people to live better" by building affordable homes for people who struggle to afford a place to live. The Local Plan states that at least 21,100 new affordable homes are required over the plan period (2016 – 2031), assuming the level of housing support through Universal Credit remains constant, which highlights the urgency of delivering against this aim within the Borough. There are two principal ways that One Housing achieves its aim: by regenerating its existing housing stock; and, by building new affordable housing. The main sources of funding for these activities are building, selling and renting homes on the open			Yes		Support for policy D.H2 (part 6) is welcomed.

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							<p>market and other commercial ventures. The Mayor's draft Good Practice Guide to Estate Regeneration (Homes for Londoners, December 2016) recognises that suitable approaches to regeneration will vary from minimal intervention to more ambitious regeneration plans. One Housing is committed to working closely with residents and communities to provide full and transparent engagement and consultation, should any changes to existing homes be considered. One Housing therefore welcomes the addition to Policy D.H2, which requires estate regeneration schemes to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities.</p>					

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1033284	Unknown	One Housing Group	LP414	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Positively prepared; Justified; Effective			<p>One Housing supports the principle in Policy D.H2 that affordable housing should comprise a range of tenures and that re-provided units within estate regeneration development schemes should have the same or equivalent rent levels. One Housing is keen to ensure that the overall supply of new affordable housing is maximised and therefore seeks rent levels, eligibility thresholds and affordable housing policy that are conducive to meeting this aim. Policy D.H2 (Part 3) proposes significant changes to the required housing mix compared with currently adopted policy and the previous draft of the Local Plan, as set out in the table below: Notwithstanding the error noted above, the intermediate housing mix in particular has changed substantially, largely due to the methodology adopted in the Strategic Housing Market Assessment (SHMA) (LBTH, 2017) evidence base report. The current approach differs from the 2009 and 2014 SHMAs, which informed the previous housing mixes, by adopting what it calls a “National Methodology” whereas the previous versions complied with the London SHMA (GLA, 2013). It is considered that the new methodology is unclear and poorly explained, meaning that the proposed intermediate housing mix cannot be relied upon if it cannot be understood how it was derived, particularly when it varies so significantly from the previous draft of the Local Plan. The proposed unit mix for intermediate housing is also considered to be unachievable having regard to the affordability constraints for both shared ownership and intermediate rent products. In line with both LBTH and GLA guidance both these products are extremely challenging to deliver, and would need to be discounted to be aligned to the affordable rent tenure types also proposed. Furthermore, the SHMA methodology for calculating affordable housing need is restricted to persons in receipt of housing benefit. This is contradictory to the NPPF definition of affordable housing, which includes eligibility to households whose needs are not met by the market. There are a large number of households in need that are ineligible for housing benefit because they are living with a family member or have savings of over £16,000. Under the current SHMA methodology the needs of these households are not currently being considered. Policy D.H2 (Part 3) is not therefore considered to be justified. One Housing also considers that policy restrictions on the market housing mix place unnecessary constraints on development. If a market housing mix is to be included in the Local Plan, then it should be worded to provide sufficient flexibility to respond to site-specific circumstances and market conditions. The combined effects of the proposed market and intermediate restrictions, when considered collectively with other requirements, are</p>	Yes		<p>Chapter 2 of the SHMA outlined the data sources for the demographic projections. This includes expected household growth numbers, including size of households. This, alongside concealed household, under-occupancy and overcrowding data (outlined in chapter 3) is the basis for figure 46. Applying the ORS Housing Mix Model, when considering the future need for different types of housing, the model assumes that the housing mix needed by households of each household type and age will reflect current patterns. For example, a growth in single person households aged 65-74 will lead to an increase in the need for the type of housing currently occupied by single person households of this age. On this basis, where such households continue to live in family housing despite no longer having a family living with them, this need for family housing will still be counted. Given the lack of a clear mechanism or incentive to encourage many households to downsize then there is very little which any planning authority can do to address under-occupation, but planning policies could seek to develop more properties which are suitable for older persons to move to. The evidence in the SHMA 2015 and SHMA update 2017 supersedes that within previous SHMA. Among other issues to consider was that there was a fundamental revision of the definition of affordable housing need in NPPG when published in March 2014. In March 2014, the government produced new guidance on conducting housing needs assessments in the form of ‘Guidance for Housing and economic development needs assessments’. Paragraph 22-29 of this new guidance covers affordable housing needs and it includes a number of significant changes since the 2007 SHMA Practice Guidance which underwrote previous assessments in Tower Hamlets. The HBF are therefore correct in assigning some of the changes to the methodological approaches. In particular, the 2007 SHMA Practice Guidance defined affordability as, ‘A household can be considered able to afford market house renting in cases where the rent payable was up to 25 per cent of their gross household income.’ However, paragraph 22 of the 2014 NPPG states that plan makers should only counting a</p>

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									<p>that values may be limited and the ability to meet affordable housing requirements in full may be unnecessarily restricted. Policy D.H2 (Part 5) states that estate regeneration development schemes should “protect the existing quantum of affordable and family units”. Whilst One Housing supports the principle of providing residents with the opportunity to continue to live in the immediate area, especially families, this policy is inconsistent with Policy 3.14 of the London Plan which states that the “loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace”. Local policy must be in general conformity with the London Plan and therefore Policy D.H2 (Part 5) is not currently considered to be effective.</p>			<p>household as being in need of affordable housing when they are, ‘...households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market.’ There is a very clear distinction between these two definitions of affordability, with the 2007 SHMA practice guidance offering a very strict test of affordability based upon a fixed percentage of income spent on rents. Meanwhile, the 2014 NPPG offers a much looser definition of affordability based upon not being able to afford market housing. In practice this change in emphasis has led to fewer households being considered as being in housing need based upon affordability. Added to this effect, the Localism Act 2011 provided new opportunities for local authorities to reconsider their local housing needs, in particular their housing registers. Since 2011, housing registers across the country have typically fallen as local authorities have re-evaluated their policies locally. The combined impact of these changes is that households who may have appeared to be in affordable housing need in an area in 2013 will now not appear to require affordable housing. This doesn’t necessarily reflect a change in their circumstances; simply that definitional changes imply that households who were previously counted as being in affordable housing need are no longer counted as such. This largely affects the need for intermediate housing where households who can afford to rent privately by spending more than 25% of their gross income on rent are no longer counted as being in affordable housing need. This does not mean that these household would not consider shared ownership or low cost home ownership products, only that their needs are currently counted in the market housing sector. The GLA SHMA 2013 utilised the pre-NPPG definitions of affordable housing need and also accounted for market signals in a manner which is different to any other SHMA in England. In general, market signals have been addressed in SHMA either through a direct percentage uplift, such as the 20% applied in the Tower Hamlets SHMA update, or through adjustments to household headship rates. The GLA SHMA 2013 used data from the 2011 census and the English Housing</p>

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												<p>Survey to assess the number of current and prospective households who did not have a suitable property at the moment. This placed a heavy emphasis on young single households who require small dwellings of their own, rather than properties to share. However, benefit reforms mean that single persons under the age of 35 years cannot receive housing benefit at anything other than the shared living rate, so they cannot afford to meet the costs of a private rented property if they require benefit support. While the Tower Hamlets SHMA 2015 sought to replicate the GLA SHMA 2013 for consistency, the 2017 SHMA update moved away from this approach to the one more generally used by ORS in the rest of England. A further change which occurred between the Tower Hamlets SHMA 2015 and the SHMA update 2017 was that the GLA update their population and household projections every year. The SHMA 2015 and SHMA update 2017 therefore used different up to date GLA projections for the core modelling. This is particularly important because the 2015 SHMA utilised 2011 based GLA projections which included the use of CLG headship rates from their 2012 based projections. However, the 2017 SHMA update used the 2016 round GLA projections which are 2015 based and utilise the 2014 based CLG headship rates. This again has impacts on the size and tenure mix across Tower Hamlets, Therefore, in summary, a combination of definitional changes in NPPG, a change in modelling away from the GLA SHMA 2013 approach to the standard ORS model and data changes between the two studies explain the variation in size and tenure mix between the SHMA 2015 and SHMA update 2017. This policy approach reflects the new GLA AH products and seeks to deliver intermediate units which are more affordable via London Living Rents. We acknowledge that suppling intermediate living rent products is more expensive for developers than shared ownership products, but this has been viability tested and found viable. We will undertake more bespoke viability testing on this point. It is not considered that the SHMA is flawed or provides insufficient evidence to support the housing mix policy. The following outlines the evidence and approach the</p>

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												<p>SHMA takes and why it is sufficient and in keeping with the NPPF. The SHMA does use the degree of housing benefits claims as a proxy for those whose needs are not met by the market. However, this is not the sole input used to determine affordable housing need. Section 3 of the SHMA provides a detailed breakdown of how the affordable housing need has been calculated. This is composed of two elements: Current unmet need and projected future affordable housing need. Figure 28 lists the component groups of current unmet need – this does include concealed households, overcrowded households and those living in unsuitable accommodation. Figure 34 lists the component groups of projected future affordable housing need. The calculation for those households projected to be in future affordable housing need is driven by two key components, trends in the uptake of housing benefit and also ORS count all households who enter affordable housing as being in need, and not just those households who receive housing benefit. Therefore, all households entering social rent are assumed to be in affordable housing need. This means that projected future need for affordable housing is calculated on the basis of projecting forward past rates of entry to affordable housing and also past rates of uptake of housing benefit in the private rented sector. Therefore, any household who is deemed to either be in affordable housing need and granted an affordable home, or any household who the government have deemed should receive support with their housing costs are counted as part of the calculation for projecting future affordable housing need. Figure 35 brings together these two elements and provides a full overview of the different components of the affordable housing need figure. It is clear that need in relation to housing benefit is only one input of many. In addition Figure 47 assesses affordable housing need against different types of affordable housing, both where households receive benefits and where they do not. It is clear that the affordable housing need also includes those who would not receive housing benefit, but whose needs cannot be met in the market. It is important to note that the SHMA does not rely upon the</p>

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												<p>private rented sector as a means of reducing affordable housing need; instead, it recognises that households in receipt of housing benefit can afford to access suitable housing in the market as they receive a welfare payment specifically for this purpose, so it would be inconsistent with the PPG to count these households as needing affordable housing (ID 2a-024): “care should be taken ... to only include those households who cannot afford to access suitable housing in the market” The SHMA does caution that if this payment was withdrawn, this would have a substantial impact on the affordable housing need; but the Government has not suggested that there is any intention to universally withdraw housing benefit from those households in the private rented sector, and it is included in the Office for Budget Responsibility long-term economic forecasts. In terms of affordability, the HBF’s submission notes that affordable housing is defined as: “social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market” and that NPPG expressly includes dealing with those who cannot afford to rent or buy market housing. The important phrases here relate to the ability to meet needs in the market, which is different to the ability to afford to be an owner occupier. Both the NPPF and NPPG are clear that households which can afford to meet their needs in the market are not in affordable housing need. Therefore, if a household can afford to rent, but cannot afford to buy a dwelling, they are not in affordable housing need. As noted from paragraph 1.19 of the SHMA update 2017 this may change in the near future when final details of starter homes are added to the NPPF and NPPG. A Starter Home is a discount affordable home to own and its inclusion in the NPPF and NPPG would require a fundamental revision of both documents. Finally, it is important to note that even if the affordable housing need were to be under-assessed, this would not mean that the OAN would be under assessed. The affordable housing need is a percentage of the OAN. If the affordable housing need were to increase, this would simply represent a large proportion of the whole OAN. The housing mix is based on an</p>

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												up to date SHMA and reflects the borough's objective to have a mixed and balanced community. Supporting text 4.36 states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs. It is not considered that Policy D.H2 (part 5) is not in conformity with London Plan (policy 3.14). The London Plan supporting text (3.82) states: 'where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floor space of affordable housing'. This was further clarified and strengthened in the Affordable Housing and Viability SPG (2.66 and 2.67), which requires a like-for like replacement. The policy approaches and clearly in conformity which has been recognised explicitly in the GLA's representation to this consultation.
1033284	Unknown	One Housing Group	LP396	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	Yes		THIS HAS ALSO BEEN COPIED TO POLICY D.DH8 Amenity One Housing welcomes Policy D.DH8 and the requirement for development to protect and where possible enhance local amenity, including adequate levels of daylight and sunlight. One Housing also supports the requirement for estate regeneration development schemes to protect and enhance existing open space and community facilities (Policy D.H2, Part 5).			Yes		Support for policy D.H2 (part 5a) is welcomed.
671908		UKI (Fleet Street) Limited	LP898	PART 3: POLICIES, 4.27 Paragraph	No				Policy D.H2: Affordable Housing This policy should acknowledge that development is required to maximise the delivery of affordable housing on site, subject to viability. Part 2 (b. i) of the policy should			Part 2bi already states: is not practical to provide affordable housing on site. This change is therefore not considered necessary.

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		and UKI (Shoreditch) Limited		Policy D.H2: Affordable housing					accept that offsite affordable housing can be considered where it is not practicable or feasible to provide affordable housing on site.			
635451	National Grid Property Holdings		LP184	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	No	Justified; Effective			Part 3 of Policy DH.2 sets out an explicit mix of market and affordable units. There does not appear to be any flexibility within this wording and this is overly prescriptive and therefore is neither justified nor effective in encouraging market or affordable housing delivery. Previous versions of the Plan did not include a set mix for market housing and it is unclear why this has been introduced at the Regulation 19 stage. In order to make this policy sound it is considered that some flexibility should be inserted either into the wording or the table itself to ensure that the targets can be delivered. This could be achieved by providing a range of percentage targets, which are subject to site specific circumstances – thus allowing some flexibility within the policy. Or alternatively, the words “Development is required to provide...” in the introductory text, could be changed to the “Development should seek to provide...”. This could then be flexible depending on the specific circumstances and constraints that apply on a site by site basis.	Yes		The housing mix is based on an up to date SHMA and reflects the borough’s objective to have a mixed and balanced community. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
635797	Greater London Authority		LP673	PART 3: POLICIES, 4.27 Paragraph Policy D.H2: Affordable housing	N/A			The draft Local Plan sets a strategic affordable housing target of 50%, including a contribution from financial payments from schemes of 10 or fewer dwellings. This approach is supported and is in line with the Mayor’s emerging approach to affordable housing. The 35% affordable housing target for schemes of 11 or more is in line with the Mayor’s Affordable Housing and Viability Supplementary Planning Guidance 2017. However, in order to provide certainty, Tower Hamlets should delete ‘subject to viability’ from the policy wording as the 35% target is supported by the evidence base for the Local Plan and viability is addressed in the supporting text. Tower Hamlets may wish to refer to the threshold approach in the Mayor’s Affordable Housing and Viability SPG 2017 which encourages applicants to meet (without public subsidy) or exceed a 35% affordable housing provision in order to benefit from the Fast Track Route. The Mayor welcomes the requirement to provide an uplift in the quantum in affordable housing units in estate regeneration			Support for approach on affordable housing is welcomed. Paragraph 4.29 links the affordable housing requirements to strategic policy S.H1. Policy S.H1 (paragraph 4.18 of the supporting text) makes it clear that levels lower than 35% will be required to provide a viability assessment. This will be clarified by through adding wording to this paragraph: Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document. The SPD will be added to the evidence links relating to policies S.H1 and D.H2. Apologies - there are missing words at the start of paragraph 4.44; these will be inserted: Part 3 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose...	

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								projects. There is text missing at the beginning paragraph 4.44. Please note, the Housing SPG was published in March 2016 with parts superseded by the Affordable Housing and Viability SPG published in August 2017.				
1143353	Greenland Hertsmer e (London) Ltd		LP867	PART 3: POLICIES, 4.29 Paragraph	N/A			Part 1 of Policy D.H2 states that: Development is required to maximise the provision of affordable housing with a 70% rented and 30% intermediate tenure split. We suggest the policy wording clarifies whether this 70:30 split refers to habitable rooms or units. Historically, tenure split may have been based on units, but Part 2 a of Policy D.H2 indicates that habitable rooms will be used for affordable housing calculations, and the Mayor's Affordable Housing and Viability SPG adopted in August 2017 also uses habitable rooms as a measure.				The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs. <i>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</i>
1143353	Greenland Hertsmer e (London) Ltd		LP869	PART 3: POLICIES, 4.33 Paragraph	N/A			Part 2 b of Policy D.H2 states that: c. Off-site affordable housing will only be considered in circumstances where it: i. is not practical to provide affordable housing on-site; ii. does not result in an over-concentration of one type of housing in any one local area to ensure mixed and balanced communities; iii. can provide a minimum of 50% affordable housing overall, subject to viability; and iv. can provide a better outcome for all of the sites, including a. a higher level of rented family homes. We suggest that the wording of this policy is clarified, to enable the provision of the greatest quantum of high quality affordable housing to meet need throughout the Borough. There may be specific cases where even if parts i) ii) iii) are not met a 'better outcome', enabled by iv) may be preferable in specific site circumstances. Similarly, it should be made clear that 'off-siting' can still be considered where a % less than 50% is supported by viability evidence. The text amendments suggested below allow this flexibility: ...iii. can provide a minimum of 50% affordable housing overall, subject to viability; DELETE <and> INSERT< or> iv. can				The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit. The 70:30 split is by habitable rooms. We will make this clearer by amending paragraph 4.28: The policy seeks to ensure new housing maintains mixed, balanced and stable communities across the borough and delivers the right range of housing products to meet locally assessed needs. <i>As outlined in part 2 (a), affordable housing calculations including the percentage of affordable homes delivered in a scheme, the percentage of intermediate and affordable rented homes and any calculation undertaken in relation to assessing part 2 (b), will be calculated using habitable rooms.</i> In relation to rented family homes, we will amend this wording to state: policy D.H2 (2biv) can provide a better outcome for all of the sites, including a higher level of <i>affordable</i> rented family homes.

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								provide a better outcome for all sites, including a higher level of rented family homes. In relation to part 2) b) vi) we request wording clarifications to provide a clearer understanding of the terms "higher level" (is this referring to habitable rooms or units?) and "rented family homes".				
1143353	Greenland Hertsmer e (London) Ltd		LP870	PART 3: POLICIES, 4.35 Paragraph	N/A			Part 2 d of Policy D.H2 states that: 2 d) where a housing development has been permitted and the permission is either subsequently amended (e.g. by means of a variation) to provide more units, or the existing development is extended to provide more units by the granting of a new permission on the same or an adjoining site which is physically or functionally linked; the new units will be considered as part of the existing development and the affordable housing calculation for the new units will reflect the whole development. It is unclear how the supporting paragraph 4.35 intends part 2 d to be applied to planning permissions which achieve additional intensity of occupation within an existing scheme. We suggest that LBTH should provide written clarification on how this policy would be interpreted in these cases.				It would depend on the nature of the scheme and how it achieved a greater intensity of occupation. For example, if the application was seeking the subdivision of 3 large units within a bigger scheme, this would be incremental development. If it was seeking to sub-divide a house into two units, that would be a new development. This policy doesn't change what schemes would be considered incremental, the purpose of this policy is to ensure that the affordable housing requirements for developments are fairly and equitably applied on all residential developments and there is no incentive to build schemes in a piecemeal, inefficient and disruptive fashion. This policy ensures that variations and new applications which are 'physically or functionally linked to existing developments, are treated in the same way as a new applications in relation to affordable housing contributions.
1143353	Greenland Hertsmer e (London) Ltd		LP872	PART 3: POLICIES, 4.36 Paragraph	N/A			Part 3 Policy D.H2 states that: Development is required to provide a mix of unit sizes (including larger family homes) in accordance with local housing need, outlined in the table below. We support Tower Hamlets' aspiration to deliver a mix of residential units across size and tenure. However, we suggest the amendments to the policy wording set out below are incorporated to allow flexibility to enable the earliest delivery of viable schemes: Development is required to provide a mix of unit sizes (including larger family homes) in accordance with local housing need INSERT <(subject to viability) and appropriate to the typology, character and location of the building,> outlined in the table below.				The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs. Viability is addressed in policy S.H1 and the policy is clear that where affordable housing delivery does not meet the threshold approach, viability information will have to be provided to demonstrate the development has maximised provision of the required housing tenures and mix.

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635797	Greater London Authority		LP674	PART 3: POLICIES, 4.36 Paragraph	Yes		Tower Hamlets should assure itself that the housing mix set out in proposed Policy D.H2 is deliverable and will be occupied as anticipated in order to meet local housing need. The Mayor's emerging approach to housing mix will be published in his draft London Plan.					The housing mix is based on an up to date SHMA and reflects the borough's objective to create mixed and balanced communities. Supporting text (paragraph 4.36) states that 'Developments may be required to meet updated identified needs as a result of monitoring', which already ensures sufficient flexibility in relation to ensuring the housing mix meets changing housing needs.
1142661	Abdul Basit		LP553	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	N/A			We support the whole policy especially this new section which we fully support. 3. Developments must use hard wearing, durable materials for the affordable housing elements of the development. All developments should be of high standard be it social or private so that it does not become unaffordable to maintain in the medium and long term of the built properties Again not enough on disable and homes for the elders				Support for the policy is welcomed. Provision for older residents and disabled residents who need specialist accommodation is included in policy H4 - although the wheelchair standards in part 1 will also support any elderly or disabled residents who require mobility support.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP652	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	Yes		We support the whole policy especially this new section which we fully support. 3. Developments must use hard wearing, durable materials for the affordable housing elements of the development. All developments should be of high standard be it social or private so that it does not become unaffordable to maintain in the medium and long term of the built properties But the line below should be clearer. Affordable housing			Yes		We welcome support and will add additional detail to the supporting text for these two parts of the policy, as follows: 4.43: Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management and minimise service charges for affordable units. Where separate cores result in separate entrances for market and affordable units, these entrances must also not be externally distinguishable and must be located so that they are of equivalent access and amenity value. 4.44: Part 3 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose, developers must use hard-wearing, durable materials to ensure the development remains of high quality

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						<p>entrances should not be externally distinguishable in quality but you can always tell which entrance is private and which is affordable by seeing the entrance area which is visible from the outside. Affordable housing should not be externally distinguishable in quality from private housing. We note that the GLA also has a child yield calculator which produces slightly higher child numbers than the LBTH calculator. Both sets of numbers are quoted in planning applications which go to the Development Committee. We think it is confusing to have two different formulae. The child yield calculator should be used to determine child numbers in a development.</p>				<p>throughout its lifetime and requires minimal service charges to clean and maintain. This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchen and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum's Section 106 Design Guide.</p> <p>We agree that it is confusing to have two child yields. This has been a result of the GLA yield being unsuitable for this borough but the LBTH yield being too out of date. This is why this plan proposes using a new up to date LBTH child yield.</p>	

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624580	Jason Larkin	Canary Wharf Group Plc	LP516	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	No	Justified; Effective; Consistent with national policy			Part 1 (b) of the policy states that minimum floor to ceiling heights of 2.5m are a requirement. This goes beyond what the nationally space standards require which is 2.3m (across 75% of the Gross Internal Area). No robust evidence or justification is provided to place more onerous standards and as such this part of the policy should be deleted. In terms of part 1 (c) and the relevant supporting text in para. 4.42, there is no reference to the London Plan policy 3.8 (Housing Choice) which sets out wheelchair unit requirements. Robust evidence needs to be provided to justify the requirement for all affordable wheelchair units to be accessible (not adaptable). Without sufficient justification the policy should be amended so that it is consistent with the London Plan. There would appear to be a contradiction between parts 2 and 3 of the policy, with part 3 of the policy singling out affordable housing for certain types of materials. This is not a matter for a planning policy and should be left to a planning condition. Similarly, the requirement in para. 4.44 for all family-sized affordable homes to have separate kitchen and living rooms should be left to discussions taking place as part of the planning application process as there may be circumstances where it is appropriate to have combined kitchen and living spaces. Part 5 (a) and (b) of the draft policy replicate design standards from the Mayor's Housing SPG (2016), albeit do not appear to include any of the flexibility that the Housing SPG provides for those instances where it is not appropriate to provide private outdoor amenity space. To ensure effectiveness, the Council should apply greater flexibility to how amenity space is provided. For example oversizing a unit in a high rise development could provide a better quality living environment (and indeed preferable to occupiers of that unit) than having an external balcony. Further vanilla forms of private amenity space provision for other forms of tenure in particular Built to Rent does not provide opportunities to create different and better living environments which this sector lends itself to. Additionally the provision of balconies increase build costs which in turn could result in unnecessarily higher rental levels and therefore additional affordability concerns Given the dwelling design standards set out in the Mayor's Housing SPG, we would question why there needs to be reference in draft policy S.H1 (as well as draft policy D.ES7: 'A zero carbon borough') to the Home Quality Mark standard which we understand is still under development by the BRE. We have not found the evidence to support why this standard should be applicable within the borough and without sufficient evidence the application of the Home Quality Mark is not justified. A new Play Space Child Yield Calculator has been set out by the Council	Yes		<p>Given the high density of development being built in Tower Hamlets, higher ceiling heights and greater space standards are required to ensure adequate light penetration and air circulation. These standards were laid out in the Housing SPG and have been embedded in the new draft London Plan.</p> <p>The wheelchair policy has been adapted following GLA comments so it is now better aligned to the London Plan policy. Further evidence (The Accessible Housing Assessment 2018) has been produced to support this position.</p> <p>We do not consider that these two policies are in conflict. The purpose of part 2 is to ensure that the affordable housing should not be easily identifiable or noticeably different. We consider that this is possible to deliver, while ensuring the affordable housing is fit for purpose. Just as design policies seek to ensure materials are appropriate for contexts, this policy also seeks to ensure materials used in the developments are suitable for their long term use. The policy will be further clarified by adding additional detail to the supporting text for these two parts of the policy, as follows:</p> <p>4.43: Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management and minimise service charges for affordable units. Where separate cores result in separate entrances for market and affordable units, these entrances must also not be externally distinguishable and must be located so that they are of equivalent access and amenity value.</p> <p>4.44: Part 3 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose, developers must use hard-wearing, durable materials to ensure the development remains of high quality throughout its lifetime and requires minimal</p>

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								<p>as part of the evidence base. Draft policy D.H3 requests the use of this calculator for new developments to establish the level of demand for playspace required. We do not agree with the approach taken by the Council to develop this methodology. This methodology is based on the GLA's 'Population Yield Calculator' which was developed by the GLA as a research tool to consider the variations in household composition at various density levels. This calculator was not developed for the intention of modelling demand for playspace. The GLA have previously developed and published a Child Yield Calculator for measuring demand for playspace in line with their Supplementary Planning Guidance (SPG) on Play and Informal Recreation (2012). Using the data from the GLA Population Yield Calculator for the borough alone, relies on a very small sample size (14 sites, with a total of 1,600 units). Whereas the established calculator set out in the GLA's SPG on Play and Informal Recreation which is used widely across London, is based on a sample size of just under 7,000 homes. As the new GLA Population model was not designed for this intention, the methodology for establishing the age profile is less robust than in the GLA Playspace Calculator which is based on surveys. The new GLA population model calculates the age profiles pro-rata therefore does not accurately reflect the age profile characteristics of different types of households/ units. The use of the methodology for the assessment of the number of children living in new developments set out in the draft Local Plan is therefore not justified and draft policy DH.3 should be revised to reflect the methodology set out in the GLA's SPG on Play and Informal Recreation</p>			<p>service charges to clean and maintain. This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchen and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum's Section 106 Design Guide.</p> <p>The guidance regarding affordable family homes having separate living rooms and kitchens is in the supporting text and already provides sufficient flexibility to be managed through the development management process. The wording continues the approach set out in current Managing Development Document (2013) but provides more explicit guidance.</p> <p>Tower Hamlets has an extreme open space deficit which has negative impacts on health and biodiversity. The provision of private and communal amenity space which is outside and of sufficient size helps to mitigate the impact of the open space deficiency in the borough. This has been recognised in the new draft London Plan, which removes the flexibility the Housing SPG contained. The viability test assumed a build cost inclusive of balconies and was found to be viable. Tall buildings policy D.DH6 provides guidance for wind testing and any implications for balconies on tall buildings would have to be addressed. In addition, policy D.ES2: air quality (part 4) provides further guidance on the provision of outdoor space. This will be explicitly linked in the supporting text:</p> <p>4.46 In considering the design and layout of private amenity space, it is important that the space meets the minimum standards set out in the policy (see part 5) to ensure that residents have sufficient space to carry out activities such as drying clothes or eating a meal outside. In relevant areas developments should also be guided by policy D.ES2: air quality in relation to the layout and design of amenity space.</p> <p>We accept that the written ministerial statement (WMS) sought to prevent local planning authorities from requiring developers to comply with any standards</p>

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												<p>other than the Building Regulations and the optional technical standards. However the policy does not require the Home Quality Mark to be met - it encourages developments to do so. We recognise that the purpose of the WMS was to reduce burdens to encourage development to come forward, development has been coming forward in Tower Hamlets and we are not of the view that this will impact on development coming forward. We also consider that in light of the density of development coming forward in Tower Hamlets, it is locally important to ensure it is of the highest quality in order to ensure development is sustainable.</p> <p>Tower Hamlets already has its own child yield calculator which is regularly used instead of the GLA calculator. This simply updates it and is based on the most relevant dataset. We do not recognise the description provided of the GLA child yield calculator. The GLA child yield calculator is based on research undertaken by LB Wandsworth from a site occupation survey (in which they surveyed around 4,000 units, with a 50% response rate, built in Wandsworth between 1997 and 2003). It is therefore based on a small and dated sample. In addition, the nature of development in Wandsworth and Tower Hamlets, as well as of the population (not least the difference in percentage of the population which are children), are very different, resulting in the GLA child yield being considered inappropriate for this borough.</p>
1142493		Berkeley Group	LP404	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	No				D.H3: Housing standards & quality Part 5e of the Policy introduces a new Child Yield Calculator for calculating child play space. This unnecessarily duplicates the Mayor of London's SPG and potentially requires two sets of calculations for different decision makers. Remove Part E Soundness test: Consistency with London Plan and deliverability (effectiveness)	Yes		<p>Tower Hamlets already has its own child yield calculator which is regularly used instead of the GLA calculator. This simply updates it and is based on the most relevant dataset. We do not recognise the description provided of the GLA child yield calculator. The GLA child yield calculator is based on research undertaken by LB Wandsworth from a site occupation survey (in which they surveyed around 4,000 units, with a 50% response rate, built in Wandsworth between 1997 and 2003). It is therefore based on a small and dated sample. In addition, the nature of development in Wandsworth and Tower Hamlets, as well as of the population (not least the difference in percentage of the</p>

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												population which are children), are very different, resulting in the GLA child yield being considered inappropriate for this borough.
1142035		Hermes Property Unit Trust	LP160	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	Yes			Policy D.H3: Housing standards and quality We support the requirement to meet the most up-to-date London Plan space and accessibility standards. We do however consider that the word 'minimum' be omitted from criteria a. The policy then continues to list the requirements. Given criteria a), the policy should instead make it clear that the developments should meet the standards in the most up-to-date London Plan, thus avoiding conflicting or out-of-date policy requirements. Part 5, should define 'major' developments.		Yes		<p>Given the high density of development being built in Tower Hamlets, higher ceiling heights and greater space standards are required to ensure adequate light penetration and air circulation. These standards were laid out in the Housing SPG (GLA, 2016) and the policy has therefore sought to embed certain housing standards which are currently only within the Housing SPG (GLA, 2016), into Local Plan policy. It is acknowledged that these are now within the draft London Plan - but this is not yet adopted. However, we acknowledge the current wording is slightly confusing and so proposes the following amendment:</p> <p>1. Development is required to demonstrate that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards; in particular:a. it provides a minimum of 2.5 metres floor-to-ceiling heights; andb. at least 10% of new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user.</p> <p>The supporting text will also be amended to reflect these numbering changes.</p> <p>Major development is already defined in the glossary, so this change is not considered necessary.</p>
635451	National Grid Property Holdings		LP186	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	No	Justified; Effective			The policy is neither justified nor effective as Part 4 does not consider the quality of the existing space and that it may be possible with good planning and design to lose some amenity space and yet significantly enhance the amenity and accessibility of an area. In order to make this policy sound, Part 4 should be reworded to state. "Development is required to protect and re-provide existing amenity space (private, communal and child play space). Net loss of existing amenity space can be acceptable where improvement to the quality and accessibility of the amenity space is made."	Yes		Tower Hamlets has an extreme open space deficit which has negative impacts on health and biodiversity. The provision of private and communal amenity space which is outside and of sufficient size helps to mitigate the impact of the open space deficiency in the borough. This has been recognised in the new draft London Plan, which removes the flexibility the Housing SPG (GLA, 2016) contained.

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635797	Greater London Authority		LP675	PART 3: POLICIES, 4.40 Paragraph Policy D.H3: Housing standards and quality	N/A			<p>As stated in my previous letter, Policy D.H3 is generally supported, however in order to be applied to planning decisions, the policy needs to explicitly require/state: • 90% of dwellings to be built to the optional accessible housing standard M3(2) contained within Part M vol. 1 of the Building Regulations ‘accessible and adaptable dwellings’ • 10% of dwellings to be built to the optional accessible housing standard M4(3) contained within Part M vol. 1 of the Building Regulations ‘wheelchair user dwellings’ The accessible housing standards system is very particular- and planning policy must require M4(2) and M4(3) to be ‘switched on’, in order to allow those standards to be conditioned, and the conditions to then be checked by the building control body (on site and on plan). Part 1ci of the policy and its supporting text go beyond the requirements of M4(3) by introducing the requirement of a second lift where the M4(3) unit is above ground floor. Whilst the reasons for this are understood, it is considered that the additional expense of a second lift may limit the location of all wheelchair accessible/adaptable units to the ground floor, reducing housing choice and exposing occupiers to disproportionate impacts of crime (ground floor flats are more likely to be broken into). In addition, the policy and supporting text should cover ‘wheelchair user dwellings’ (dwellings that can be adapted) and not only ‘wheelchair accessible dwellings’ (adapted dwellings). Part 1cii of proposed Policy D.H3 and its supporting text introduce the concept of commuted sums in exceptional circumstances where wheelchair units cannot be accommodated on-site. Tower Hamlets’ proposed requirement for two lifts is likely to contribute to the lack of lift circulation space and the lack of accessible parking on-site can be overcome on a site by site basis (for example by on-street solutions). This approach is a departure from</p>				<p>LBTH consider that the proposed policy approach ensures the delivery of affordable rented wheelchair accessible housing which meets the needs of those on our accessible housing waiting list. We have produced further evidence (Accessible Housing Assessment 2018) to demonstrate the need for this policy and its applicability and deliverability.</p> <p>We will make the following changes to the policy for clarity and to ensure conformity with building regulations, as follows:</p> <p>c. At least 10% of dwellings are built to the ‘wheelchair user dwellings’ accessible housing standard M4(3) and the remainder of dwellings are built to the ‘accessible and adaptable dwellings’ accessible housing standard M4(2) both contained within Part M volume 1 of the Building Regulations. at least 10% of new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user.</p> <p>We will amend the supporting text to align with the policy change, as follows:</p> <p>In order to implement part 1 (c) and meet standards in the Housing Supplementary Planning Guidance (GLA, 2016), 10% of all new units across all tenures should be wheelchair user dwellings accessible or wheelchair adaptable, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. All wheelchair units in the affordable tenure should be wheelchair accessible (not adaptable). All ‘wheelchair user dwellings’ (the M4(3) standard) in the affordable rented tenure should meet the M4(3) (2) (b) standard which meets the needs of occupants who use wheelchairs.</p> <p>It is expected that units which meet the wheelchair accessible-user dwellings standards M4(3) (2) (b) units above the ground floor will be provided with access to a second lift for use when the primary lift is not functioning. We have a preference that units which meet the wheelchair-accessible user dwellings standards M4(3) (2) (b) will be provided below the fifth floor due to</p>

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							Policy 3.8 of the London Plan and should be removed.				difficulties allocating wheelchair accessible units on higher floors. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space and restrictions on ground floor residential uses) could lead to applicants arguing that could sufficiently limit the ability for units which meet the wheelchair accessible user dwellings standards M4(3) may not be able to be delivered on site. In these circumstances, we may accept payments in lieu of the provision of units which meet the wheelchair accessible user dwellings standards M4(3) through the 'Project-120' scheme.
635797	Greater London Authority		LP676	PART 3: POLICIES, 4.42 Paragraph	N/A		The supporting text in paragraph 4.42 should explicitly address M4(2) dwellings as well as 'wheelchair user dwellings' to ensure this type of dwelling is delivered in accordance with the London Plan. In addition, wheelchair accessible units should only be required from affordable housing where the local authority is responsible for allocating or nominating a person to live in that dwelling, in line with the Planning Practice Guidance and paragraph 3.49A of the London Plan.				<p>We will make the following changes to the policy for clarity and to ensure conformity with building regulations, as follows:</p> <p>c. At least 10% of dwellings are built to the 'wheelchair user dwellings' accessible housing standard M4(3) and the remainder of dwellings are built to the 'accessible and adaptable dwellings' accessible housing standard M4(2) both contained within Part M volume 1 of the Building Regulations. at least 10% of new homes are designed to be suitable for occupation by a wheelchair user or could easily be adapted for occupation by a wheelchair user.</p> <p>We will amend the supporting text to align with the policy change, as follows:</p> <p>In order to implement part 1 (c) and meet standards in the Housing Supplementary Planning Guidance (GLA, 2016), 10% of all new units across all tenures should be wheelchair user dwellings accessible or wheelchair adaptable, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. All wheelchair units in the affordable tenure should be wheelchair accessible (not adaptable). All 'wheelchair user dwellings' (the M4(3) standard) in the affordable rented tenure should meet the M4(3) (2) (b) standard which meets the needs of occupants who use wheelchairs.</p> <p>It is expected that units which meet the wheelchair accessible-user dwellings standards M4(3) (2) (b) units above the</p>

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												ground floor will be provided with access to a second lift for use when the primary lift is not functioning. We have a preference that units which meet the wheelchair-accessible user dwellings standards M4(3) (2) (b) will be provided below the fifth floor due to difficulties allocating wheelchair accessible units on higher floors. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space and restrictions on ground floor residential uses) could lead to applicants arguing that could sufficiently limit the ability for units which meet the wheelchair accessible user dwellings standards M4(3) may not be able to be delivered on site. In these circumstances, we may accept payments in lieu of the provision of units which meet the wheelchair accessible user dwellings standards M4(3) through the 'Project-120' scheme.
1142656	Rabina Khan		LP531	PART 3: POLICIES, 4.44 Paragraph	No	Positively prepared; Justified; Effective			(Local Plan 2031) P72, 4.44: Part 3 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In the last Local Plan adopted in 2013 in my former Cabinet Position of Housing & Regeneration I had put in measures to plan for family homes at affordable prices, but in the new plan it appears that the vision is to build far fewer family homes at higher prices. The Local Plan 2031 clearly recognises that a home is likely to be occupied by a family, yet there is less scope for a family to settle in Tower Hamlets due to the higher social housing tenure bands (Intermediate rents).			London Affordable Rent reflects the formula rent cap figures for social rents and are the equivalent of target rents, the lowest rents we currently require under the Managing Development Document (2013). The policy still requires a split between rented affordable houses and intermediate houses of 70% and 30% (D.H2.1). This is the same as the Managing Development Document (2013). Within the 30% intermediate requirement, the requirement for family unit provision has increased from the Managing Development Document (2013) requirement. This reflects the new Mayor of London intermediate tenure (London Living Rent) which is more affordable to local residents. This split therefore seeks a greater delivery of affordable family homes than the Managing Development Document (2013).

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1053884		Queen Mary University of London	LP484	PART 3: POLICIES, 4.49 Paragraph Policy H4: Specialist housing	No				In our previous representations QMUL sought further clarification on Policies H4 (Specialist Housing) and H6 (Student Housing) to establish the rationale behind two separate policies and whether student housing developments would be required to meet the standards set out in both. We acknowledge and support the changes to Policy D.H6 (Student Housing) and the clarifications made to the student and specialist housing policies. QMUL support the amendment of Policy D.H6 (Student Housing) to ensure support for student accommodation in highly accessible locations or in close proximity to existing education institutions. It is clear the policy relating to specialist housing (Policy H4) does not apply to students and this is welcomed by QMUL. Whilst the reference to 'staff accommodation ancillary to a relevant use' is welcomed within the subtext of Policy H4, specific reference to key worker accommodation such as that linked to the establishment of a Life Sciences campus should be added to provide further clarity.	Yes		We welcome support and recognition of changes made since regulation 18. There is insufficient evidence to demonstrate why key worker housing is required as opposed to the general delivery of market, intermediate and affordable housing which can also meet the needs of key workers and we therefore do not consider the proposed change to be justified.
1142274	Manpreet Kanda	Royal Borough of Kensington & Chelsea	LP568	PART 3: POLICIES, Chapter 10: Managing our waste	N/A			RBKC is the Waste Planning Authority for this Borough and is part of the Western Riverside Waste Authority (WRWA) area. The other WRWA WPAs include Hammersmith and Fulham, Wandsworth, Lambeth and OPDC (for land which falls within Hammersmith and Fulham only). The Council is undertaking a Local Plan Partial Review (LPPR) which was submitted with supporting documents to the Secretary of State for Communities and Local Government for independent examination by the Planning Inspectorate in May this year. To inform the LPPR on waste the Council has prepared a joint Waste Technical Paper (WTP) with the Waste Planning Authorities within the Western Riverside Waste Authority (WRWA) area. The joint WTP provides evidence of the waste movements in and out of RBKC. There are no identified waste movements between RBKC and Tower Hamlet.			Policy S.H1 points interested readers to the Gypsy and Travellers Needs Assessment which provides details of what the borough's need is (footnote 27). Due to the changing definition, this is quite detailed and it was felt it wasn't necessary to include this detail in the plan itself.	
1142152	Glenda Parkes	Bamfords Trust	LP97	PART 3: POLICIES, 4.59 Paragraph Policy D.H6: Student housing	No	Effective			The requirement to be in close proximity to the Borough's institutions is potentially too restrictive. The provision of student accommodation has a wider strategic requirement that needs to be addressed across London, to apply such a restriction could constrain the ability to provide the necessary student accommodation.	No	The policy is too restrictive and may constrain the provision of student accommodation The policy should	The policy already includes greater flexibility by also directing student housing towards 'highly accessible locations'. This would be suitable for accommodation which is helping to meet wider London need. It is not considered that greater flexibility is required.

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											be amended to replace 'close proximity' to 'reasonable proximity'; to allow flexibility.	However, we will make a minor amendment to clarify that student accommodation should be directed to locations which are in close proximity to the borough's higher education institutions or in highly accessible locations.
636029	Unite Group PLC		LP565	PART 3: POLICIES, 4.59 Paragraph Policy D.H6: Student housing	No	Positively prepared; Effective			paragraph 4.4.7.1 of the document which outlines principle support towards the provision of student accommodation in the borough which they state makes a positive impact to the local economy, our communities and the borough's higher education provision. It is fundamental that the growth of these HEI institutions is supported given their strategic outreach and contribution to the local economy. Though Unite understands that the delivery of student housing needs to be managed in accordance with strategic need and local priorities; the council does however need to demonstrate greater flexibility in its ability to be pragmatic towards projected increases in student numbers. This will be sustained up to the plan period of 2031 given the total removal of student admission controls and unsurprisingly this has resulted in an upward trend in the number of students applying to University and subsequently being accepted onto undergraduate degrees in England over the last three years since the relaxation. More importantly, this has enabled the opportunity for some Universities to expand their institutions in light of the additional numbers. This makes it even more important to deliver the necessary supporting infrastructure including student housing delivery to consolidate their growth. As such Unite Students would like to object to the Council's position on the priority for conventional forms of housing over non-conventional types which the Council identifies as including student housing. This is referred to within strategic policy H1 and policy H6; a dedicated policy for student housing delivery within the borough. Unite students feel this policy would deter the delivery of student housing and also does not fully grasp the positive role that student housing can have on the wider delivery of more conventional forms of housing including family homes. Greater consideration should therefore be given to wider benefits that the delivery of student housing can bring to the delivery of more conventional forms of housing. The deliverability of student housing is paramount to solving the housing crisis in city-regions such as London with student housing known to impact on local housing markets and economies in the following ways: • Release of other market housing on to the general market such as the alleviation of concentrations of HMOs to family housing. This can effectively relieve the current pressure of certain areas in the borough currently experiencing high concentrations of HMOs; • Strong demand for higher			LBTH recognise the role of student housing in meeting local and strategic varied housing need. However, LBTH has been one of the main contributors towards London's provision of student housing and there is a risk this undermines the provision of other forms of housing need - in particular conventional housing. The Local Plan seeks to redress this balance, in line with the London Plan's strategic approach to 'encourage a more dispersed distribution'. In addition, the policy already includes greater flexibility by also directing student housing towards 'highly accessible locations'. This would be suitable for accommodation which is helping to meet wider London need. It is not considered that greater flexibility is required. However, we will make a minor amendment to clarify that student accommodation should be directed to locations which are in close proximity to the borough's higher education institutions or in highly accessible locations.

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									<p>quality university product amongst International and Post-graduate students thus stimulating further investment; • PBSA has played an integral role in allowing the HE sector to expand over the past 20 years; • Student Housing can be far more suitable for certain central location sites, particularly wherein site circumstances would not allow for the levels of amenity space provision required in larger residential schemes. Thus Unite Students consider this part of the policy should be re-worded to ensure the delivery of student housing is not deterred unfairly. This is in light of other mechanisms which have been used to deter the delivery of student housing including CIL, which is highly set as a charging levy in Tower Hamlets on all new student housing schemes. Thus the delivery and viability of student housing has been adversely impacted in prime Central London locations given an unfair advantage to competing land uses in terms of competitive returns and the deliverability of development. In light of the above, the perhaps unintended consequences of the above are: Again this demonstrates the difficulties that arise when strategic mechanisms are put in place to try to deter the delivery of student housing as there is a subsequent knock on to other conventional forms of housing. Thus Unite Students would encourage that the Council continue to proactively support the delivery of student housing in the borough, particularly given the ability of student housing to release other housing which would render it a sustainable form of development.</p> <p>Recommendation: Our recommendation thus remains unchanged, though greater emphasis is provided to ensure wider policy support is afforded to the growth and expansion of current HEI's and supporting infrastructure including student housing. This is especially where they would relieve pressure on conventional forms of housing in areas of identified need. Unite would further seek to comment on policy wording at 4.60 which states currently: "In the context of this policy, student housing relates to private student accommodation, student accommodation with an undertaking with an institution and accommodation provided by an institution. Appropriate locations predominately consist of a dense urban grain where the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport. Close proximity is defined as adjacent to the institution or within walkable distance of 10 to 15 minutes". The proposed definition of "close proximity" is arbitrary and doesn't account for wider sustainable forms of travel. The policy should be promoting various forms of sustainable transport and not just limiting students to walk to University. Students are prepared to cycle and use public</p>			

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									transport in order to get to their institution. This would result in students travelling beyond 10-15 minutes walking distance to their institution.			
1053884		Queen Mary University of London	LP667	PART 3: POLICIES, 4.59 Paragraph Policy D.H6: Student housing	No	Positively prepared			Mile End Campus As highlighted in our previous representations, QMUL occupies a prominent position within Mile End providing academic, administrative and student accommodation for QMUL students and staff. The Mile End Campus (see enclosed plan) is the largest self-contained campus in London. In order to support the growth of the university and maintain and enhance the quality of teaching, student experience and research, QMUL have aspirations for significant redevelopment of parts of the campus over the plan period, including substantial additions to the amount of learning, teaching, student social and academic space. The high-level plans were tabled at the meeting with officers in February 2017 and the current plan as drafted does not sufficiently recognise these growth requirements. This intrinsically links to the policy of the supply of purpose built student accommodation and the supply of conventional homes. By the University intensifying their existing sites for additional accommodation, it will allow other sites to become available for other types of self-contained housing or uses. In this regard the plan is not sound as it has not been positively prepared to ensure this growth can be accommodated over the plan period. QMUL would welcome engagement with LBTH to discuss their ambitions, and whether an allocation within the plan would be appropriate in order to guide this growth. Through an allocation QMUL would seek to protect the existing use and provide scope for the Universities growth aspirations, in particular academic space and supporting accommodation. This is particularly important in light of Policy D.H6 (Student Housing) which requires that new purpose-built student accommodation be directed to locations in close proximity to the boroughs higher education institutions and highlight accessible locations. SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption. Mile End Campus - QMUL would welcome further engagement on the future aspirations for the Mile End Campus, and to ensure the policies are aligned. To enable this, we would propose that a site allocation is developed to meet the universities growth requirements.	Yes		It is not considered that the suggested approach is justified. The vision for the central area sets out the aspirations for the development of the QMUL campus. The vision refers to a diverse range of housing types. Allocating the site would not add any benefit to the proposed uses on site. In addition, the site does not meet the criteria set out in the site allocation methodology to deliver 500 net additional homes (threshold as per London Plan policy 3.7) as well as infrastructure.

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635797	Greater London Authority		LP677	PART 3: POLICIES, 4.59 Paragraph Policy D.H6: Student housing	N/A			Proposed Policy D.H6 should be amended to be more flexible so that student housing is located in close proximity to the borough's higher education institutions or in highly accessible locations. If students can walk to their institution, the accommodation does not have to be so highly accessible. London Plan Policy 3.8 is clear that the provision of student housing can meet a demonstrable local or strategic need.				We will make a minor amendment to clarify that student accommodation should be directed to locations which are in close proximity to the borough's higher education institutions or in highly accessible locations.
1142152	Glenda Parkes	Bamfords Trust	LP113	PART 3: POLICIES, 4.6 Paragraph	No	Effective			The wording is too restrictive the definition of close proximity to a strict walking distance is potentially far too constraining on the wider strategic delivery of student accommodation. The 'cycle super highway' is readily and easily accessible across Tower Hamlets, as is access to good public transport options. To limit suitable locations to a walking distance of 10-15 minutes from an institution is unrealistic and unduly constraining and this should be removed to render it sound.	No	The restriction to a 'walking distance' is unduly constraining on a particular element of important strategic provision. The wording should be amended to remove the restriction to a walking limit and the change to incorporate public transport and cycling accessibility would render this aspect less constrained.	The policy already includes greater flexibility by also directing student housing towards 'highly accessible locations'. This would be suitable for accommodation which is helping to meet wider London need. It is not considered that greater flexibility is required. However, we will make a minor amendment to clarify that student accommodation should be directed to locations which are in close proximity to the borough's higher education institutions or in highly accessible locations.
1142152	Glenda Parkes	Bamfords Trust	LP111	PART 3: POLICIES, 4.61 Paragraph	No	Effective			The wording is too restrictive and will potentially prove inflexible. It does not reflect the fact that across London and in Tower Hamlets public transport links are very good and with the introduction of the 'cycle super highway' there is easy accessibility to means of public transport and to restrict this to a limited walking distance is too restrictive.	No	The wording is far too restrictive and potentially will constrain the implementation of wider strategic objectives and provision of student accommodation. The wording should be amended to remove the reference to walking distances and replace this with good access to public transport and cycling.	The policy already includes greater flexibility by also directing student housing towards 'highly accessible locations'. This would be suitable for accommodation which is helping to meet wider London need. It is not considered that greater flexibility is required. However, we will make a minor amendment to clarify that student accommodation should be directed to locations which are in close proximity to the borough's higher education institutions or in highly accessible locations.

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1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP653	PART 3: POLICIES, 4.65 Paragraph Policy D.H7: Housing with shared facilities (houses in multiple occupation)	N/A			Policy D.H7: Housing with shared facilities (houses in multiple occupation) We recognise, there is a lot of pressure on our housing stock from HMO's but we need to preserve a wide range of housing in order to create sustainable communities; but must be well regulated and should be designated to certain areas only		Yes		The policy seeks to balance the need for HMO accommodation with the need to retain family housing and ensures it is of high quality and in suitable locations
1054236	EID Partnership		LP293	PART 3: POLICIES, 4.65 Paragraph Policy D.H7: Housing with shared facilities (houses in multiple occupation)	N/A			The co-living model has garnered attention with policy makers at both a national and regional level as a model for delivering non-traditional residential accommodation of a high quality at a genuinely affordable price. The Mayor's Draft Housing Strategy 2017, outlines the need for London's housing offer to be diversified and provide a wider range of housing typologies. The strategy supports the rise in purpose-built private rented homes (Build to Rent), which will provide a more stable and well-managed supply of homes at a range of rent levels across London. Although not specifically outlined in the strategy, the co-living model is arguably a form of 'build to rent' accommodation that can contribute to meeting the Borough's Housing Need by providing accommodation for a market demographic that is currently under supplied. In addition to the above, it is our understanding the New Draft London Plan (to be published late November 2017) will advocate the development of co-living schemes and recognise the model as being an important contributor to meeting London's housing need. Therefore we encourage the Borough to consider the importance of 'co-living' schemes and how they can contribute to the Borough's Housing alongside more conventional housing typologies. We therefore suggest that clarity is added to the Isle of Dogs and South Poplar housing needs development requirements and the acceptable housing typologies are outlined in the box following Paragraph 5.6 of the Local Plan. We therefore propose				It is not considered necessary to provide further clarification relating to specific housing typologies in the sub-area principles. The housing policies contain details on housing typologies, including policy D.H7: housing with shared facilities, which specifically relates to co-living and locations that are generally acceptable for such accommodation e.g. high transport accessibility. The sub-area principle requires the housing typology to create sustainable places, therefore if a co-living scheme is appropriate then it will be deemed acceptable in principle.

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							that the text is amended to read: 'Meeting housing needs 5. Deliver a range of housing typologies to include town houses, flats, maisonettes, duplexes, INSERT<co-living accommodation and build to rent accommodation, with high quality and well-defined amenity spaces which are appropriate for the proposed type of use.>				
1054236	EID Partners hip		LP294	PART 3: POLICIES, 4.65 Paragraph Policy D.H7: Housing with shared facilities (houses in multiple occupation)	N/A		In addition to the above, we note that there is no housing policy within the draft local plan that address the coliving model. Policy D.H7 (Housing with Shared Facilities) refers only to existing and proposed houses in multiple occupation (HMOs). We therefore suggest that this policy is amended to reflect the evolving policy discussions and likely policy direction of the London Plan and include text on suitable locations for co-living accommodation and set out the amenity facilities required to support this housing typology. We support the recognition within paragraph b) of the policy that housing with shared facilities 'can be secured as a long-term addition to the supply of low cost housing'. However, we seek further clarification what criteria will be used to classify the units as affordable housing. The co-living model seeks to provide genuinely affordable housing and we seek for this to be recognised within the Borough's planning policies.			Supporting text (paragraph 4.65) outlines what forms of housing we would consider fall under this policy. We envisage this also includes co-living which we have sought to describe as 'accommodation modelled on student housing but available for a wider range of occupants.' We will clarify this by inserting the following: ..accommodation modelled on student housing but available for a wider range of occupants or accommodation described as 'co-living' . We consider this approach adequately balances the rise in this form of housing with ensuring it meets housing need, is of a suitably high quality, and contributes towards the delivery of affordable housing need (our priority need as outlined in the SHMA 2017). Paragraph 4.67 explicitly already outlines how the affordability of the proposed rents will be assessed.	

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1143346	James Armitage -Hobbs	The Collectiv e	LP834	PART 3: POLICIES, 4.65 Paragraph Policy D.H7: Housing with shared facilities (houses in multiple occupation)	No				TOWER HAMLETS LOCAL PLAN 2031 (REGULATION 19) Introduction DP9 represents The Collective who specialise in delivering a range of innovative housing products across London. This includes their Co-living concept which is a high-quality, shared living rental product which focuses on shared communal facilities between the residents. This representation provides details about the Co-living concept, information on current and emerging policies relating to new housing products in London and provides specific comments on the draft Local Plan Policy D.H7: Housing with shared facilities which we welcome and support. Co-Living Concept Co-living is focused on providing high-quality affordable accommodation for London's working population. It is a market product that relies on no public subsidy. Given the focus on shared communal space, Co-living schemes are not just a home, but create a social experience, bringing people together and creating communities. The result is that people often wish to remain within a Co-living scheme for several years until they reach a different stage of their life. It is therefore a stepping stone on the ladder before more traditional forms of residential accommodation, at a rental price point affordable to London's working population. The affordability of the product will help to keep London's workers living in London, rather than being forced away from their places of work by the rising cost of housing. As highlighted above, the living experience is designed around community via the provision of various amenity spaces and the facilitation of their active use. Whilst some facilities within a Co-living scheme are shared, each tenant would have their own bedroom, which would typically come with an ensuite bathroom. Tenants would typically pay a monthly fee which is inclusive of, but not limited to: • Rent • Utility bills • Council Tax • Wifi • Cleaning • Linen change Current Policy A number of London Boroughs have all acknowledged and identified the need to increase the supply of high-quality housing for London's workers. The challenge that London's Boroughs have recognised is the lack of a clear planning policy framework that deals with innovative housing products such as Co-living, and particularly how to deal with affordable housing targets. The London Plan recognises the increasingly important role the private renting sector (PRS) has in meeting Londoners' diverse housing requirements and Policy 3.8B a1 sets out that the planning system must provide positive and practical support to sustain the contribution of this sector in addressing housing needs and increasing housing delivery. This position is reinforced in Part 4 of the Homes for Londoners: Affordable Housing and Viability SPG 2017 which refers to such products as 'Build to Rent'. London Plan Policy 3.8 states that			Whilst it is recognised that co-living is a different form of housing product we still consider the London Plan Space standards to be the most appropriate standards to be complied with. Residents are expected to be living in these properties for a significant amount of time (these are not short terms lets or student housing) and they are dense developments delivered in a dense borough. These space standards are required to ensure adequate light penetration and air circulation. Replacing defined standards with the term 'good' is too loose and can be widely interpreted. We do not consider the majority of new co-living schemes to be an affordable product. The rents charged for schemes already delivered in London far exceed London Affordable Rent or even Tower Hamlets Affordable Rent levels. By requiring schemes which do not deliver affordable rents to meet the same requirements as all housing developments, allows schemes to undertake a viability assessment if they cannot meet the 35% threshold and suggest alternative approaches to delivering a maximum level of affordable housing contributions.

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									<p>Londoners should have a genuine choice of home that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. A set of criteria were introduced into the Mayor's Housing SPG (2016) recognising the need for this type of specialist housing and sets out guidelines for innovative, non-self-contained accommodation. It is supportive of Co-living schemes in locations with a high PTAL in mixed use areas, where high quality management can be ensured and unintended user groups such as the homeless can be controlled. It makes it clear that viability appraisals should be undertaken to determine whether affordable housing can be delivered as part of such schemes. The new London Plan is due out for consultation later this month. This will include a new policy relating to shared living products such as Co-living. We have engaged with GLA on the draft policy and we understand it will build upon the principles set out in the Mayor's Housing SPG (2016). This has influenced our comments on the Tower Hamlets Local Plan (2013) Tower Hamlets Local Plan 2031 Policy D.H7: Housing with shared facilities (houses in multiple occupation) We welcome and support the draft policy. However, we propose that it is amended as follows: New houses in multiple occupation will be supported where they: a. do not result in the loss of existing larger housing suitable for family occupation; b. can be secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing; c. are located in an area of high transport accessibility; d. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood; and e. e. comply with relevant standards and satisfies the housing space standards outlined in policy D.H3. We propose criterion e is changed as follows, e. Rooms and communal spaces are of a high quality and of adequate size and the development provides a good quality standard of accommodation. This amendment is necessary because as currently drafted Policy D.H3 (Housing standards and quality) states that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards; The London Plan space standards relate to dwellings which are defined under Class C3 of the use classes order. However, this does not include larger HMOs such as Co-living so the Class C3 standards are not relevant. The amended criterion e of the policy is consistent with the approach to other draft policies coming forward and the Mayor's Housing SPG and would ensure the quality of schemes can be guaranteed. In terms of affordable housing required under criterion b, Co-living is a market rental product that relies on no public subsidy and typically provides accommodation</p>			

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									at rental levels that can be afforded by those who would otherwise qualify for traditional affordable housing provided by Boroughs or Registered Providers. Given that Co-living is a housing product (notably contributing towards housing delivery targets) and does not fall within the current definition of traditional affordable housing, we are currently following the Housing SPG, 2016 approach to test what the maximum reasonable contribution this housing product can make towards subsidised affordable housing. As a rental product, which the London Plan recognises has a distinct economic model, and given the rental levels the market derives it will not be able to deliver affordable rental levels for London's workers and also achieve the target market sale levels for traditional affordable housing targeted by the Mayor. To ensure that Co-living maximises its contribution towards mixed and balanced communities and is meeting a range of housing needs, the suggested approach as schemes come forward is to undertake viability appraisals and focus any subsidy available in one or both of the following ways: 1. A financial payment to the Borough to bring forward traditional affordable housing to meet the specific local needs. 2. A discounted market rent approach to a proportion of the co-living units. This would be expected to follow a similar approach to Section 4 (Build to Rent) of the Mayor's Affordable Housing SPG. Where this has been explored to date Co-living has been able to provide for incomes which would cater for those on low starting salaries in their first jobs. It is suggested that policy flexibility is provided for either of these approaches to be considered on a site by site basis, so that the Council can consider how to maximise that affordable housing outcomes from Co-living. *Note this rep includes a suggested amendment to policy D.H7*			
1143324		Resolution Property plc	LP825	PART 3: POLICIES, 4.65 Paragraph Policy D.H7: Housing with shared facilities (houses in multiple occupation)	No	Effective			In addition to the above, we note that there is no housing policy within the draft local plan that address the coliving model. Policy D.H7 (Housing with Shared Facilities) refers only to existing and proposed houses in multiple occupation (HMOs). We therefore suggest that this policy is amended to reflect the evolving policy discussions and likely policy direction of the London Plan and include text on suitable locations for co-living accommodation and set out the amenity facilities required to support this housing typology. We support the recognition within paragraph b of the policy that housing with shared facilities 'can be secured as a long-term addition to the supply of low cost housing'. However, we seek further clarification what criteria will be used to classify the units as affordable housing. The co-living model seeks to provide genuinely affordable housing and we seek for this to be recognised within the Borough's planning	Yes		Supporting text (paragraph 4.65) outlines what forms of housing we would consider fall under this policy. We envisage this also includes co-living which we have sought to describe as 'accommodation modelled on student housing but available for a wider range of occupants.' We will clarify this by inserting the following: ...accommodation modelled on student housing but available for a wider range of occupants or accommodation described as 'co-living'. We consider this approach adequately balances the rise in this form of housing with ensuring it meets housing need, is of a suitably high quality, and contributes

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									policies.			towards the delivery of affordable housing need (our priority need as outlined in the SHMA 2017). Paragraph 4.67 explicitly already outlines how the affordability of the proposed rents will be assessed.
1143308	Raycliff Whitechapel	Memery Crystal	LP795	PART 3: POLICIES, Chapter 5: Delivering economic growth	No	Effective			Our client would like to make specific comments on draft policy relating to employment and development within the CAZ, as set out in Part 3, Chapter 5: Delivering economic growth. Overall the employment policies in this chapter appear to overlap and in some cases are overly complex and prescriptive. It is considered that they would benefit significantly from rationalisation.	Yes		Comment noted.
1143308	Raycliff Whitechapel	Memery Crystal	LP799	PART 3: POLICIES, Chapter 5: Delivering economic growth	No	Effective			In general, our client is supportive of the economic objectives of the new Local Plan. However, we suggest that greater flexibility is needed to allow specialist sites to be assessed on a case-by-case basis, particularly in regard to employment policies. Due to the historic or other sensitive nature of some buildings within the borough, together with the ever-changing character of various areas, including Whitechapel, some sites are no longer appropriate to continue operating under their established use class. Therefore, it is crucial that policies take this into account. Further, there should be a wider acknowledgement of the benefits that uses outside the B classes can bring to vibrant areas, particularly within the CAZ and Major Town Centres.	Yes		It is considered the plan already provides suitable flexibility for change of use from employment uses where the site is genuinely unsuitable. However, please note that greater flexibility to assess schemes on a site-by-site basis has been built into policy S.EMP1. Furthermore, policies are already clear that non-B uses can be supported within employment areas and other locations. The proposed modifications to policy S.EMP1 are set out below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided , and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised . Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary

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												<p>Zones POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace. 2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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1053283		Travis Perkins	LP878	PART 3: POLICIES, 5.6 Paragraph	No	Positi vely prepa red; Consi stent with natio nal policy			f) Suggested Amendments to Draft Local Plan The draft Local Plan sets out in Chapter 5 (Delivering Economic Growth) that employment space is coming under increasing pressure from development, stating at paragraph 5.2: Page 5 "Industrial land in particular has been lost at a faster rate than originally planned, creating a shortage that could undermine the ability of the borough and the key international business locations of Canary Wharf and the City of London to function effectively". Paragraph 5.6 seeks to provide protection for sui generis uses as well as traditional employment uses, stating: "This chapter relates to employment uses within the 'B' use classes (business, general industrial and storage and distribution) and sui generis industrial functions" TP supports this intention to protect sui generis uses, however in order for protection to be ensured this should form part of the glossary of the emerging Local Plan. The glossary of the Draft Local Plan does not currently include any definition of employment floorspace and therefore sui generis builders' merchants are not afforded protection. A clear definition of employment uses should be included in the glossary to read: "Employment Floorspace / Uses = Class B Floorspace / Uses and similar sui generis floorspace / uses such as builders' merchants" This will ensure that sui generis businesses such as builders' merchants which do not fall within the B Use Classes are given the same protection as traditional employment uses. This inclusion will help to ensure that the loss of a successful builders' merchants such as the TP branch at Hollybush Place is protected, either as a standalone business or as part of a mixed use redevelopment to include the builders' merchant. This will ensure that the Local Plan affords protection to these employment generating uses, in line with the national policy and the need to protect industrial land, as set out in the Employment Land Review. g) Conclusion The absence of a glossary definition of employment land provides a loophole for developers to redevelop sui generis industrial type sites such as builders' merchants, for alternative uses. The draft Local Plan as currently drafted is therefore not effective or consistent with national policy. We trust that the content of this letter is clear and we would be grateful if you would keep us informed of the progress of the Local Plan. Should you have any questions or wish to discuss the future of this site, please do not hesitate to contact me.	Yes		It is considered that paragraph 5.6 makes it clear that sui generis industrial uses are covered within the policies; therefore, no further specific reference within policies is necessary. The glossary will be updated to define employment uses: Employment uses: Offices, industrial and storage and distribution facilities which fall under B1,B2 and B8 of the use classes order, as well as other sui generis uses with industrial functions.

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1142035		Hermes Property Unit Trust	LP165	PART 3: POLICIES, 5.7 Paragraph	Yes			In general terms, the policies contained within the Tower Hamlets Local Plan 2031 should be developed in line with the Government's requirements as set out in the NPPF, notably, paragraph 22: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Moreover, we consider that the allocation of Thomas Road as a Local Industrial Location (LIL) does not fully consider the following: a) the extensive pre application consultation undertaken for the site (reference:) since 2015 to redevelop the site to provide high quality residential and employment; b) that the site only operates a trade counter and storage function, with little light manufacturing or industry; c) the absence of any dialogue with the site owners in terms of its allocation as a LIL; d) the development of adjacent sites as residential and the conflict that may arise in terms of amenity, traffic and highways and compatible neighbouring uses. Given the above context, we consider that the allocation of the site is inappropriate and unreasonable. Instead it is considered more reasonable to focus on Policies D.EMP2 and D.EMP3: Loss of employment space, and set out clear expectations that the provision of employment floorspace that increases the level of employment opportunities will be supported. This would in our view, meet the requirement of the NPPF, as stated in paragraph 19 to "...support economic growth through the planning system."		Yes		The council's evidence supports the identification and designation of Thomas Road as a LIL in light of a need for industrial floorspace. Furthermore, the draft new London Plan reflects this position and identifies Tower Hamlets as a borough in which current industrial provision should be maintained.

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1054236	EID Partners hip		LP181	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	N/A			Republic at East India Dock lies within a Local Employment Location. We suggest the following text amendments are made to Policy S.EMP1 part 1 to enable the Tower Hamlets Local Employment Locations to deliver thriving workplaces places through a mix of uses where appropriate. It is noted that within Primary 3 Preferred Office Locations and Secondary Preferred Office Locations, residential is considered appropriate as a complementary land uses, it is considered that subject to the preservation of the employment floorspace, residential should also be appropriate in Local Employment Locations. As such we consider the following wording should be amended: "These are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, local or specialist employment needs, and to support the needs of startups, small-to-medium enterprises, grow-on space and creative and digital industries. Complementary land uses such as community, educational and residential uses are appropriate where they do not harm the function of the employment location"				<p>Comment noted. Overall, it is considered that other policies in the plan already support delivery of uses that complement the role and function of employment areas. Nevertheless, greater flexibility has been added to policy S.EMP1 placing greater emphasis that schemes will be assessed on a case-by-case basis. Please see the proposed modifications below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floor-plates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone CAZ uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs Primary and Secondary Cores. They are relatively peripheral compared to the Pprimary and Ssecondary Cores Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace. 2.</p>

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												<p>Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
635451	National Grid Property Holdings		LP191	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Justified; Effective			It is noted that Figure 11 shows Site Allocation 1.3 within the Cambridge Heath LEL. At present, the uses on the gas works site do not match to those protected in the policy of the text (i.e. a range of office, industrial and studio workspaces). The gasholder site makes up approximately 50% of the 1.3 site allocation and therefore it is vital that it is understood that this element of this site is not currently supporting employment uses – it is a disused gas storage facility and could easily be excluded from the LEL allocation. If the housing requirements for the Plan and this site specific allocation are to be met, then it is vital that this Policy does not unduly restrict housing development on the gasholder site. Either remove the gasholder site from the LEL, or as a minimum, provide absolute clarity that the existing gasworks is not counted as existing floorspace which would need to be replaced. NOTE TM TO VIEW THIS UNDER SITE ALLOCATIONS TOO	Yes		It is not considered necessary to specifically refer to gasholders within this policy. The Local Employment Location designation at Cambridge Heath merely seeks to retain the existing employment function and character of the area, and promote the delivery of additional employment space of the types specified in policies S.EMP1.1 and D.EMP4.4f across the designation. This will help meet the borough's overall employment projections and further enhance the vibrancy of the LEL and corresponding designation across the border in Hackney.

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635773	Al Mubarakia Ltd		LP206	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	Yes		Policy S.EMP1 (Creating Investment and Jobs) Policy S.EMP 1 identifies the Tower Hamlets Activity Areas (THAA) as having potential to 'accommodate substantial employment growth to support the strategic role of the neighbouring CAZ and Primary and Secondary Preferred Office Locations'. The policy states that proposals will be supported which provide opportunities to maximise and deliver investment and job creation in the borough through: a. supporting and promoting the competitiveness, vibrancy and creativity of the Tower Hamlets economy; b. protecting the borough's global, national, regional and local economic roles in delivering jobs and supporting businesses; c. ensuring a range of job opportunities at all levels are provided throughout the borough, particularly within designated employment locations, the			Yes		We do not feel it is appropriate to extend the Tower Hamlets Activity Area boundary at this stage. It is considered that there is already scope within the plan for employment uses to come forward on the Tobacco Dock site, and any potential future extension to the boundary would be reviewed at a future date once the employment floorspace has come forward.

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							<p>Central Activities Zone, Tower Hamlets Activity Areas and designated town centres; and d. ensuring the borough's residents have access to education and skills that will enable them to benefit from local employment and enterprise opportunities. We support the aspirations of this policy and would like to ensure that a range of employment generating uses are appropriate within the THAAs. Tobacco Dock is currently used as an iconic events space and conference facility, which provides a range of job opportunities at all levels. As such, Al Mubarakia would like to ensure LBTH takes a flexible approach to the implementation of this policy, and supports the provision of a broad range of employment generating uses. Tobacco Dock itself is located within the City Fringe Tower Hamlets Opportunity Area. Currently, the wider site does not all fall within the Activity Area, only</p>					

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							Tobacco Dock itself. Therefore, Al Mubarakia request that the City Fringe Activity Area is extended to support the redevelopment and delivery of a comprehensive, coordinated scheme across the whole site.					
1142365		Newport Holdings Ltd	LP224	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Our client's site has been included within a Secondary Preferred Office Location (SPOL). The role and function of these areas under draft Policy S.EMP1 is stated as: "These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant weight is given to office and other strategic Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must not exceed 25% of the site area and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised". We firstly consider that the wording of this policy is imprecise and is therefore not effective. It	Yes		Comments noted. Regarding the proposed employment floorspace thresholds, it is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG (GLA, 2016) and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floor-plates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not

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								<p>is not clear what '25% of the site area' is referring to. This could be a percentage of the site's total area i.e. land footprint, the footprint of any building(s) proposed on site or the floorspace of the entire development. It is noted that in any scenario this may not achieve the re-provision of existing office floorspace on site but, notwithstanding this, the draft policy wording places an entirely unreasonable restriction on future mixed-use development which is supported under the London Plan and national policy. The 25% figure is unjustified and unnecessary and could significantly undermine the viability and deliverability of mixed-use developments which, as clearly stated by the Mayor under para. 4.12 of the London Plan, are key in supporting London's economic growth which "...depends heavily on an efficient labour market and this in turn requires adequate housing provision to sustain it". The NPPF lists under one of its core planning principles (para. 17) the need to "...promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas..." The London Plan Policy 4.3 (mixed use development and offices) and its supporting text (para. 4.17) sets out that within the Central Activities Zone (CAZ) "...strategically important office development should include other uses, including housing. As a general principle, housing and other uses should be required on-site or nearby to create mixed use neighbourhoods. Exceptions to this should only be permitted where mixed uses might compromise broader objectives..." Policy 4.3 also states that "...where justified by local and strategic office demand assessments and in areas identified in LDFs as having a particular need for local office provision, require residential proposals within the CAZ which would otherwise result in the loss of office space to make a proportionate contribution to provision of new office space within, or nearby, the development". Further to this, within Opportunity Areas, the London Plan sets out that development proposals should "...seek to optimise residential and non-residential output and densities... and, where appropriate, contain a mix of uses". The London Plan therefore supports mixed-use development in the Opportunity Areas and the CAZ on the basis that, where justified, any proposal which would result in the loss of office space re-provides this within new office space either on site or nearby. LBTH's current adopted policy (DM16) and that set out in the previous draft of the Local Plan 2031 (Preferred Approach regulation 18 consultation in November 2016) (draft policy EMP4) take a similar approach and require that any redevelopment of an existing employment site in the (previously identified) POL re-provides the existing office floorspace as part of the</p>			<p>exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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									<p>proposed development. This policy approach allows for redevelopment of an office building to provide replacement office floorspace but places no restriction on the amount of residential floorspace which may be delivered as part of a mixed-use (and taller/denser) redevelopment, allowing this to be judged on a case-by-case basis against the relevant planning policies (such as amenity, townscape, heritage etc.). The current draft of the Local Plan, however, now takes a fundamentally different approach with no justification for doing so. It is not consistent with the policies of the London Plan or national planning policy. We therefore request that the policy is re-worded to revert to its previous iteration which supported the re-provision of existing office floorspace on site (i.e. no net loss) but places no unreasonable or unjustified restriction on the quantum of residential floorspace forming part of a mixed use development. This would provide consistency with the London Plan and national policy. We also consider that, in the context of the current application which is due for determination in early 2018, our client's site at 26-38 Leman Street and 39-47 Alie Street should be removed from the SPOL with inclusion in the CAZ (zone C) where equal weight is given to office and residential proposals. This is addressed later in these representations. Summary In summary our client is generally supportive of the Local Plan with reference to housing supply and the tall buildings zone, but considers there are fundamental issues with the draft policies set out under Chapter 5, particularly S.EMP1 and D.EMP4. It is not considered that these draft policies are positively prepared, justified, effective and/or consistent with regional and national policy. The key issue of concern is the constraint placed on the quantum of housing delivered as part of mixed-use redevelopment in the SPOL and the CAZ (zone C). We consider that the restrictions to residential as '25% of the site area' only within the SPOL and a maximum of 50% of total floorspace within a development in the CAZ (zone C) should be deleted and the previously drafted approach reinstated i.e. within the SPOL the redevelopment of an existing employment site should re-provide the existing office floorspace as part of the proposed development, and within the CAZ equal weight should be given to office, residential and other strategic CAZ functions, as set out under draft Policy S.EMP1. We also consider that, based on our client's live planning application for residential-led redevelopment within the tall buildings zone, with strong support from the Mayor and LBTH for the delivery of 25% office (re-provision of existing) and 75% residential, their site should be removed from the SPOL and placed in the CAZ (zone C), subject to the above comments on draft Policy D.EMP4 part 3. In</p>			

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									order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.			
1142398		David Abraham Partnership	LP247	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Positively prepared; Justified; Consistent with national policy			Policy S.EMP1 indicates that CAZ (Zone C) provides existing employment space and opportunities for office developments and mixed use schemes. It does not recognise, however, that this area also includes low grade, inefficient residential buildings which present opportunities for intensification and residential-led/mixed use redevelopment, to contribute towards the borough's acute housing need and the role of residential accommodation within the CAZ to supporting its strategic function. Changes: Policies S.EMP1 and D.EMP4 should be redrafted to encourage residential and mixed use development within Zone C of the CAZ, particularly at sites currently in, or containing, existing residential accommodation.	Yes		It is considered that existing policy wording already allows scope for such mixed use redevelopment to come forward, particularly within CAZ zone C (now tertiary area).

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624910	Sir or Madam	Telford Homes PLC	LP260	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No				I write to you with regard to the above on behalf of my client, Telford Homes Plc, who wish to make formal representations on the proposed submission version of the Local Plan. Telford Homes has high reputation within the industry for producing desirable new homes at affordable prices, and delivering integrated development with high quality design and construction. The company has won a number of awards for its high standards, including a 99.5% recommendation rate for 2015. Telford Homes retains a number of significant land holdings within the Borough, which are either completed developments, under construction, pending a planning decision or subject of pre-application discussions. They are also the joint applicants (together with Poplar HARCA) for the comprehensive redevelopment of Chrisp Street Market, currently under consideration by the Council's planning department (application reference number: PA/16/01612). It is on the above basis which these representations are made. General Telford Homes queries the suitability of retaining the existing Thomas Road Local Industrial Location (LIL) designation as detailed in draft Policy S.EMP1. Given this area has seen a large number of residentially-led mixed-use permissions and current planning applications, the designation is surrounded by existing and emerging residential and this is questioned as a suitable location for continued industrial use given potential amenity impacts to adjacent residential properties. It is considered that a mixed-use designation would be more appropriate in this location. Telford Homes also considers that the Council should include wording within Policy S.EMP1 to allow for complementary/compatible land uses to be acceptable within Employment Locations, where they comply with Policy D.EMP2 and/or they complement the employment function of the area. This will allow the employment locations to respond to market trends for increased activity in the workplace which has stemmed from the blurring of live, work and play, without the loss of employment floorspace being permitted by policy.			Comment noted regarding the Thomas Road LIL designation. It is considered that the council's evidence on the protection of floorspace for industrial uses is strong and accords with the new draft London Plan. It is also considered that industrial uses, especially of the type typically found within LILs, are not necessarily incompatible with surrounding residential uses.

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1142424	OCM Luxembourg Buckle Street Apart-	OCM Luxembourg Buckle Street Apart-Hotel Sarl	LP280	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Justified; Effective; Consistent with national policy			<p>Policy S.EMP1 and D.EMP4 Evidence Base 1. Paragraphs 5.1 – 5.5 indicate that in order to meet future projections for jobs in office and industrial uses the broad planning policy target should be to protect existing floorspace and encourage new floorspace to be delivered either as standalone developments, or through mixed use developments. We broadly support this approach, though consider that the strategy for protecting existing B Use Class floorspace and sites should be more flexible than currently proposed by policies in Chapter 5, in order to be effective and sufficiently justified. 2. The higher GLA projections for jobs and floorspace are based on a 10 year trend covering 2005-15, typically representative of a full economic cycle and including a strong upward growth period at the national and local level as well as the 2007-8 financial downturn. It also included the one-off 2012 London Olympic Games which provided a significant regeneration and employment boost to East London and the Olympic borough's, including Tower Hamlets. Much of the jobs and floorspace growth during this period was driven by the financial sector particularly at Canary Wharf (which benefitted from the Jubilee Line extension). 3. GLA projections are not broken down at the sector level and therefore a greater degree of interpretation is required. The Tower Hamlet's 2016 Employment Land Review notes that whilst one should not "dismiss the GLA view", "Repeating the past growth cycle will be ever more challenging". A key factor is a significant labour constraint and the need to import an ever increasing labour force from greater distance. 4. The Experian projections, recognised as one of the top forecasting sources, include an adjustment for Brexit effects and the 2016 Employment Land Review provides narrative on the balance between the Experian 'Brexit' projections and the GLA 'aspirational' projections. Views on the effect of Brexit on the economy remain under debate however there is considerable concern that downward effects will be incurred and that London as a financial centre has one of the greatest sensitivities to negative job outmigration – with Oxford Economics reporting that the financial sector is most at risk of all services (Oxford Economics, Assessing the Economic Implications of Brexit). 5. Whilst the NPPF provides a requirement to 'plan positively for growth' the three-fold difference in floorspace requirements between Experian and GLA projections are a cause for concern. Taking the above factors into account, planning for GLA projected growth and policies that seek to protect offices at the expense of other economically active and job creating uses is likely to insufficiently respond to local and wider market signals and have a downward effect on the local economy and efficiency of land use provision.</p>	No		<p>Comments noted. It is considered that the council's approach to the Secondary POL and Zone C is justified and supported by evidence which has been prepared between regulation 18 and 19 stages. We recognise the need for mixed use development in CAZ zone C (now tertiary zone) and support new residential development. The 50% threshold has been included in order to protect the strategic function of the CAZ and to set out the council's position clearly on this issue. However, please note that the wording of policies S.EMP1 and D.EMP4 will be amended to build in more flexibility and to recognise that proposals will be assessed on a site-by-site basis.</p> <p>Regarding the approved list of workspace providers, we do encourage applicants to work with recognised workspace providers, although the supporting text is clear that this is not a requirement for applicants.</p> <p>The proposed modifications to policy S.EMP1 are set out below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones POLs. They are relatively peripheral</p>

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									<p>6. We therefore believe that the development plan is unsound on the basis that policies are just based upon a robust evidence base and are unjustified. Policies S.EMP1 and D.EMP4 7. Part 1 of Policy S.EMP1 seeks to establish the Designated Employment Locations in the Borough. This includes the Central Activities Zone (CAZ). Within the CAZ it is stated that there are opportunities for 'other employment uses' within mixed use developments. It also states that equal weight is to be given to proposals for residential, other employment uses or other strategic CAZ functions in this location, including visitor accommodation. 8. This approach is supported and reflects the policies set out within the Central Activities Zone SPG. 9. Policy S.EMP1 supports economic growth in the broader sense, not just in terms of office or industrial uses (B Use Classes). This accords with policies within the National Planning Policy Framework at Paragraphs 18-20 which encourages all forms of economic development and jobs growth. Again this is supported. 10. Notwithstanding, there seems to be some confusion between Policy S.EMP1, Paragraph 5.14, Policy D.EMP4 (3) and Paragraph 5.34 and how these parts of the plan should be applied to a development proposal. NPPF paragraph 154 states that "Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan." The conflict between the policies and paragraphs needs to be addressed in order for the plan to be effective and consistent with national policy. 11. Policies S.EMP1 indicates that mixed use development will be sought in the CAZ, comprising employment and/or other strategic CAZ uses. Equal weight will be attributed to these uses and residential use. 12. Paragraph 5.14 however states that a 'significant quantum' of employment floorspace should be provided in developments in this location, seeking a split of 50% employment and other strategic CAZ uses, and 50% residential. 13. The 50% target sought by Paragraph 5.14 seems to be arbitrary and does not rely upon evidence to support this position. Further, if employment, other strategic CAZ uses and residential uses are equal, why does paragraph 5.14 seek to include a percentage split between them? 14. Related to this, Policy D.EMP4(3) supports the redevelopment of buildings in the CAZ to be up to 100% 'employment use' / 'other strategic CAZ function'. 15. Paragraph 5.34 which supports this policy then states that 'there should be an overall increase in employment floorspace as a result of any redevelopment proposal. Where there is deviation below the 75% and 50% proportions of office floorspace, applicants must</p>			<p>compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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									<p>provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation." 16. Policy D.EMP4(3) whilst supported, would seem to conflict with Policy S.EMP1 which seeks mixed use redevelopment in the CAZ. More significantly though, is that paragraph 5.34 could be read that an application for the redevelopment of land/buildings in the CAZ should increase the amount of employment floorspace. It is not clear whether the phrase 'overall increase' is meant as a Borough wide increase, or resulting from each development. Clearly the latter would conflict with both the wording of the policy it supports (D.EMP4) and also S.EMP1 and Paragraph 5.14. 17. These aspects of the proposed plan should be revised to provide clarity as to the expectations placed upon development in the CAZ which seeks the redevelopment of existing employment space. Given that Chapter 5 of the plan is concerned with increasing jobs growth; rather than focussing on the provision of employment floorspace within redevelopments, an alternative strategy could be to seek developments to provide a similar number of jobs. This is the approach taken in the City Fringe Opportunity Planning Framework (2015). 18. Part 2 of Policy S.EMP1 is supported, though it requires further clarification to take account of developments occurring in the CAZ. In this location other strategic CAZ uses are also supported, and in this context Part 2 a - d should all be drafted so as to reflect the contribution non-B Class Uses can make to the Borough's economy. As currently worded, and read alongside Paragraph 5.6, the policy would not clearly recognise the importance of other types of jobs in accordance with the NPPF's definition of 'economic development'. 19. Part 3 of Policy S.EMP1 is broadly supported though we are concerned with supporting text in Paragraph 5.20 which states that "we will particularly welcome proposals which demonstrate co-operation with recognised workspace providers, for which we hold an approved list." 20. We are not aware of the list of approved providers within the published evidence base, and this should be made public for review prior to examination. Further, this aspect of the policy is anti-competitive (therefore conflicting with the NPPF) as it implies that unless a workspace provider is 'approved' by the Council then their application may not be treated equally to that of an approved provider. This aspect of the policy is unjustified and should be deleted.</p>			

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1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP332	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	Yes		Development which supports, protects and enhances the role and function of the borough's designated employment locations and maximises the provision of employment floorspace to meet the borough's target of creating 125,000 new jobs over the period to 2031 will be supported. The Bishopsgate Goodyard site is located within the Central Activities Zone (Zone C) within which there are opportunities for some larger purpose-built office buildings and significant provision of office and other employment uses as part of mixed-use schemes which is supported. It is also noted that "Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations" which is supported. The policy also notes that proposals will be supported where they provide a range of workspace and unit sizes, start up space, co-working space and 'grow-on' space by					<p>Comments noted. All local plan policies are viability tested as well as being 'subject to viability'. Therefore, it is not considered necessary to add in this reference. Please note that greater flexibility has been added to policy S.EMP1 where schemes deviate from the employment floorspace thresholds on a case-by-case basis. The proposed modifications to policy S.EMP1 are set out below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not</p>

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							protecting existing floorspace and encouraging the provision of new floorspace; and working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace. A clause should be added to note that this is subject to scheme viability.					<p>exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
1054350	Frasers (Central House) Ltd		LP377	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Positively prepared; Justified; Effective			Frasers supports the importance which Policy S.EMP1 places on encouraging investment and job creation within the Borough. Further, we note that the policy acknowledges that the Council will maximise the provision of employment floorspace to meet the Borough's target of creating 125,000 new jobs over the period to 2031 as set out in the GLAs projections as confirmed within the Tower Hamlets Employment Land Review (2016). This is a positive and welcomed provision. We also note that a number of suggested designations have been placed across strategic employment locations in the Borough in order to help achieve this target, including the provision of a Central Activities Zone - Zone C area, within which the Central House site would be located. This is detailed within Policy S.EMP. 1 and D.EMP. 4 The suggested Zone C designated areas are to be zones within the CAZ which are outside of the Preferred Office Locations (POL) primary cores and secondary zones. It is noted, that in such zones there are opportunities "for some larger purpose-built office buildings". This is supported. However, it further states, particularly in its supporting text (para 5.14) and through Policy D.EMP.4 (3) and its supporting text (para 5.34), that "redevelopment within the CAZ (zone C) should be mixed-use to include office or other non-residential	Yes		<p>Policy D.EMP4.3 will be amended to remove conflict with policy S.EMP1. It is considered that the policy consistent with the role and function of the CAZ zone C (now tertiary area) as articulated in policy S.EMP1.(part 1), however in response to this representation, further clarification has been provided in the policy that employment-only development is appropriate in these locations. It is otherwise considered that the designation of the Central House site is appropriate and based on evidence as set out in the Preferred Office Location Boundary Review, 2017. Proposed modifications to policy S.EMP1 are set out below:</p> <p>Central Activities Zone (Zone-tertiary area) This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built</p>

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									<p>floorspace” – suggesting sole office developments or other sole strategic CAZ functions are not acceptable. The drafting of the policy gives rise to potential ambiguity in interpretation. As noted in the London Plans Central Activities Zone SPG (2016). London’s status as a global city is reliant on the unique role the CAZ plays in focusing and fostering business activity. Indeed, as the SPG states: “The Central Activities Zone (CAZ) is London’s globally iconic core and one of the world’s most attractive and competitive business locations. It accommodates one third of London’s jobs and generates almost 10% of the UK’s output” (Pg. 1) The CAZ SPG further confirms the CAZ as an ‘internationally and nationally significant office location’ and the agglomeration of business functions and activities in the CAZ results in ‘exceptional levels of productivity which cannot be replicated elsewhere in the UK and provides national level benefits’. (pg. 8). The London Plan, through the SPG is clear in that: “Offices and other CAZ strategic functions should be given greater weight relative to new residential” As such, we would request that the Policy and supporting text be amended to make it clear that the Policy supports both ‘larger purpose-built office buildings’ and also support mixed use development. Failure for this policy to clearly state its support for sole office use means it would fail to have regard for the London Plan and the CAZ SPG and would fail the test of para 20 of the NPPF, which requires that, in order to achieve economic growth, “local planning authorities should plan proactively to help meet the development needs of businesses and support an economy fit for the 21st century.’ Aside from amending the wording of Zone C CAZ Policy and without prejudice to the above, should LBTH still maintain that the current Zone C policy is sufficiently drafted, we are unclear why the zone would include the land where Central House is. As set out in the Preferred Office Locations Boundary Review, Zone C areas are identified as being: “Less well connected to the core office areas, and generally have lower levels of public transport accessibility.” Central House is clearly well connected to core office areas and with excellent public transport accessibility. The area of City Fringe located around Whitechapel Road and Commercial Road is located within an area of PTAL rating 6a and 6b (the highest rating) and has excellent transport links. Furthermore, the Tower Hamlets Growth Sectors and SME Workplace Study within the Local Plan’s evidence base confirms that the economic functionality of the city fringe is one which has a close relationship with Tech City and the City of London. This evidence base indicates that the City Fringe Sub Area, within which Central House is located, is one that enjoys strong connections to a commercial core. Indeed, Central House is within a</p>			<p>office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p>

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									minute's walk of buildings such as Aldgate Tower and the Relay Building. It is not clear that reasonable alternatives were reviewed by LBTH to test whether the provision of office space within such well-connected areas and proximate to strong business locations should be given higher priority than that afforded under Zone C designation. it is considered that in order to better protect the Borough's ability to meet its employment needs, a Preferred Office Location (POL) or Secondary POL designation should be used within the area of the CAZ in which Central House is located to properly align with the CAZ SPG. Under Para 182 of the NPPF, the Local Plan needs to provide the most appropriate strategy to meet the development needs of the Borough. For the Local Plan to meet this objective, designations need to be more proactively considered in order to best provide the scope to maximise job creation to help meet the Local Plan's target of 125,000 jobs by 2031. Economy – The plan is not positively prepared, due to ambiguity in the drafting, the CAZ zone C designation could be interpreted in such a way so as not to support the statutory London Plan and related guidance, thereby unnecessarily limiting opportunities to meet targets for employment floorspace and, as such, cannot be consider effective. Policy S.EMP1 and D.EMP4 fail to be consistent with Para 20 and para 21 of the NPPF. In response to the above we would propose: 1 Amend the proposed CAZ Zone C Policy, so that it is clear that it allows for office and employment generating development, as well as allowing for mixed use development, or a redrafting of the boundaries so that Central House is located within Preferred Office Location or the Secondary Preferred Office Location.			
1142493		Berkeley Group	LP405	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No				S.EMP1: Creating investment and jobs Policy 2c should include Opportunity Areas and Site Allocations Soundness test: Positively prepared - strategic locations and allocations should have the flexibility to provide appropriate employment generating uses.	Yes		Comment noted. It is not considered necessary to include opportunity areas or site allocations within this part of the policy given that the provision of employment floorspace will not necessarily be a priority in all parts of opportunity areas or within some site allocations.

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1053884		Queen Mary University of London	LP476	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Effective			<p>Employment – Local Employment Location QMUL welcome and support the introduction of specific policy S.EMP1 (Creating Investment and Jobs) which identifies Whitechapel as a Local Employment Location ('LEL') for the provision of small office spaces meeting local needs alongside the bio-tech and life sciences sector. Ultimately, QMUL seek to ensure the policy specifically makes reference to and encompasses all employment uses that would be present within a Life Sciences campus including start-ups, incubators and major corporations. We would propose that the Local Plan includes a definition within its glossary of 'Life Sciences Campus and that this should include general expansion of the School of Medicine and Dentistry' and the associated land uses to ensure clarity going forward. QMUL would be happy to engage with the Council on this. In our previous representations, we outlined the importance of ensuring that the policies are interwoven into the site allocation to allow the delivery of the GLA aspirations for Med City and a Life Sciences presence at Whitechapel. As noted above, QMUL welcome the identification of Whitechapel as an LEL subject to further clarifications surrounding the definition of appropriate land uses, although, we still consider there are disparities between policies relating to the LEL and the Whitechapel South allocation as detailed below which could stop the plan being effective and deliverable. SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption. General Development Policies – Clarification required that Whitechapel designated as an LEL does not conflict with the Whitechapel South allocation, particularly with regard to land use restrictions. Additional reference to key worker housing within the sub-text of the specialist housing policy to support the necessary uses that are required to deliver the aspirations for Life Sciences at Whitechapel. The reinstatement of the higher education policy to support the growth of the University over the plan period.</p>			<p>Comments noted. A glossary definition for life science will be added to the local plan. 'Life sciences: the sciences concerned with the study of living organisms, including biology, botany, zoology, microbiology, physiology, biochemistry, and related subjects'.</p>

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624580	Jason Larkin	Canary Wharf Group Plc	LP517	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Positively prepared; Justified; Effective			<p>The representations in this section are supplemented by an 'Employment Policies Review' produced by our planning and socio-economic consultants Quod (Attachment 5). Draft Policy S.EMP1 sets out the role and function of employment land designations. It should be made clear in the first row of the Table that the Primary Preferred Office Location ("POL") only applies to parts of Canary Wharf (as illustrated in Figure 11). The role and function of the Primary POL should include reference to other strategic CAZ uses as per the Mayor of London's 'Central Activities Zone' SPG, March 2016. This reflects the supporting used such as retail etc.; required for a successful office market and the existing commercial core at Canary Wharf. The wording in this section of the policy should be read "This predominantly consists of office along with other strategic Central Activity Zone uses...". The North Quay site is identified in Figure 11 within a Secondary POL. The draft policy states that while residential uses can be included in Secondary POL, it must not exceed 25% of the site area. However, there is no justification of the weighting of 75% office or other Core CAZ uses against 25% residential in the 'POL Boundary Review' (2017) evidence base document. The figure is just referred to as a "guide" (para. 1.6 of the POL Boundary Review 2017). This proportion also goes further than the Mayor of London's CAZ SPG which states that in CAZ Zone B, offices and other CAZ strategic functions should be given greater weight relative to new residential (i.e. there is no quantified proportion). In supporting para. 5.11 the Council confirm that the Secondary POL equates to CAZ Zone B. Furthermore, the draft policy refers to "significant weight" being given to office and other strategic CAZ uses as a first priority in the Secondary POL, which is again inconsistent with the "greater weight" defined in the CAZ SPG. This 25% weighting is also reflected in the Site Allocation for North Quay. Despite being in pre-application discussions on the North Quay site with Council officers since June 2016, with a planning application submitted in April 2017, there has been no discussion with Canary Wharf Group with regard to this 25% figure (c. 40% residential floorspace is proposed in the North Quay planning application, in accordance with the CAZ SPG's guidance for "greater weight" to be given to office and other CAZ strategic functions). The proposed restriction would represent a missed opportunity to deliver a significant amount of much needed housing (especially given the housing shortfall identified in the Housing Trajectory in Part 6, Appendix 7 of the Draft Local Plan) and the site's characteristics (i.e. in the outer ring of Canary Wharf) and the evidence clearly demonstrate that there is no sound basis for limiting this site to 25% residential. It should</p>			<p>Comments noted. The policy wording has now been amended to reference other CAZ strategic uses. Regarding the proposed employment floorspace thresholds, it is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG (GLA, 2016) and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary</p>

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									<p>also be noted that in Appendix 13 (Strategic sites testing results) of the Council's Local Plan Viability Assessment (September 2017), North Quay is identified as accommodating 1,300 units which is very close to the total proposed in the North Quay planning application (1,423). 1,300 units would represent far closer to 40% of the North Quay development floorspace than 25%. North Quay, Riverside South and Wood Wharf are all proposed to fall within the Secondary POL. The permitted outline planning permission for Wood Wharf does not fit within the 75% office and CAZ uses versus 25% residential test. Calculating this split on a floorspace basis shows that the ratio of office and other CAZ uses is approximately 40% compared to 60% residential. This illustrates the inconsistency of the application of this limitation of 25% residential within Secondary POL. The inclusion of such a prescriptive weighting within the draft policy would significantly compromise the delivery of North Quay and Riverside South. These sites need to be able to respond to changes in office market and occupier requirements. In addition, the restriction of residential development within the Secondary POL does not allow for the balance of uses required to support the diversification of Canary Wharf town centre. A key objective for the Isle of Dogs and South Poplar Opportunity Area is for the Canary Wharf Major Town Centre to develop into a Metropolitan Centre. Delivering mixed-use development, particularly around the core commercial area helps the town centre to mature, improving its resilience and ensuring its success in the long term. As such, in order to be positively prepared, justified and effective, the Secondary POL wording in draft policy S.EMP1 should be amended to refer to greater weight being given to offices and other CAZ strategic functions relative to residential within the Secondary POL and any quantitative proportions removed. The quantitative proportions applied to the Secondary POL are not required for Tower Hamlets to meet the employment targets for the Isle of Dogs. This restricted approach does not reflect the development pipeline or acknowledge that the London Plan targets for the Isle of Dogs can be met without relying on the application of further restrictions on site within the Secondary POL.</p>			<p>cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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1142656	Rabina Khan		LP537	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Positi vely prepa red; Justifi ed; Effect ive			This local plan seeks to maximise jobs from the Canary Wharf district. It assumes that over 125,000 jobs would be created by 2031 across TH, according to Policy S.EMP1 of the Local Plan 2031. The document makes reference to floor space, which could be translated into employment opportunities. The section however does not take into consideration of Brexit or makes any references to this. There appears to be a relationship between floor space and employment prospects, such as more floor space means more jobs. The Local Plan identifies two key areas within Tower Hamlets as the employment district that is Canary Wharf (Primary) and the City of London and then the central activities' zone. According to the GLA, it has identified over 100,000 jobs could be supplied (adopted 2015) via the Canary Wharf district. Again, this was projected prior to Brexit. On 31 October 2017, The BBC reported that The Bank of England believes a loss of over 75,000 jobs if the UK does not get a deal. This would affect the financial sector, which is primarily based within Canary Wharf (http://www.bbc.co.uk/news/business-41803604). It appears that the Local Plan (2031) shares the same figures as the GLA, pre-Brexit. Table 2: Floor space and job projections (p80) – clearly suggested more jobs based on more floor space. However, the plan also sets to restrict development heights, thus minimising floor space for commercial use. This is supported by Figure 9 (Principles of tall building clusters). The notion of having shorter buildings as a development moves away from the “tall building zones”. This is also restricted by “Borough Designated Views” (Figure 7) of which 4 out of 6 look into the Canary Wharf area. This would clearly hinder the employment delivery and possibly the housing delivery as prescribed by the Local Plan (2031) due to the many constraints on developments. The plan is considering accepting commercial activities such as lap-dancing clubs and casinos. As the CAZ (Central Activities Zone) increases in density and investment, there is the possibility such enterprises may capitalise on this.			It is not considered that Tall Building Zones will undermine the deliverability of employment or housing targets. The delivery of housing and employment need is not dependant on tall building zones, rather it is dependent on assessment of development density in accordance with the GLA’s Strategic Housing Land Availability Assessment. Furthermore, the tall buildings policy does not preclude tall building outside of the zones; rather they have to meet extra density criteria.
635414	City of London		LP573	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	Yes		The City Corporation supports the designation of preferred office locations; in particular those adjacent to the boundary with the City of London as illustrated in Figure 7. These locations are supported as they will form a					Support noted.

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						consistent commercial area with the associated clustering/agglomeration benefits.					
1131148	LB Hackney	LB Hackney	LP576	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	Yes	Tower Hamlets' Employment Land Review (2016) indicates demand for both industrial space and office space and projects a substantial growth in the number of jobs across the Plan period. Policies S.EMP1 and D.EMP2 direct employment uses to specific employment hubs or Activity Areas within the borough. Tower Hamlets' approach corresponds with Hackney's own approach whereby employment uses are directed towards key employment areas and designated town centres.					Support noted.

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1142691		Alliance Property Asia	LP608	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No				POLICY S.EMP1: CREATING INVESTMENT AND JOBS Development which supports, protects and enhances the role and function of the borough's designated employment locations and maximises the provision of employment floorspace to meet the borough's target of creating 125,000 new jobs over the period to 2031 will be supported. The 2-6 Commercial Street and 98-105 Whitechapel High Street site is located within the Central Activities Zone (Zone C) within which there are opportunities for some larger purpose-built office buildings and significant provision of office and other employment uses as part of mixed-use schemes which is supported. It is also noted that "Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations" which is supported. The policy also notes that proposals will be supported where they provide a range of workspace and unit sizes, start up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace; and working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace. A clause should be added to note that this is subject to scheme viability Note: No soundness test undertaken.	Yes		Support welcomed. It is considered that all local plan policies are viability tested and are also 'subject to viability'; therefore it is not considered necessary to add in this reference.

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1054252	Londone wcastle	Londone wcastle	LP623	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Justified			Development which supports, protects and enhances the role and function of the borough's designated employment locations and maximises the provision of employment floorspace to meet the borough's target of creating 125,000 new jobs over the period to 2031 will be supported. Our client strongly objects to the inclusion of the Whitechapel Estate site as a Local Employment Location. This suggested allocation is contrary the Council's own vision for the site within the Whitechapel Vision Masterplan SPD. The site was not previously designated as a Local Employment Location (LEL) due to its minimal office offering. We question why the Council has now chosen to include the site. We formally request that the Council removes the site form this designation and the existing boundary be maintained. The Whitechapel Estate site should continue to be allocated for uses consistent with the current 'Site 15' designation as set out in the Whitechapel Vision Masterplan SPD, as below: "A high density new residential quarter to accommodate family sized homes especially affordable homes and specialist housing. • Opportunities for offices and research space associated with QMUL, other accredited education and research institutions and RLH • Creation of large new open space characterised by a north/south central green spine of open space • Refurbishment of the existing listed buildings • Complementary land uses on ground floor level to provide active frontages along the Green Spine, including small scale retail (shops, cafes, restaurants) and other community facilities as appropriate." The supporting text to the policy notes that applicants should aim to ensure that new employment space that is brought forward contributes to and meets the demand of each area. It goes on to note that LELs will be expected to provide high-quality flexible workspace designed to meet the needs of emerging and growing sectors. Whilst the principle of flexible workspace is supported, there should be flexibility to also allow single occupants. By focussing too much on small start-up businesses and flexible workspace LBTH may miss out on larger businesses also looking to locate in the borough and the employment opportunities they bring. The policy also notes that proposals will be supported where they provide a range of workspace and unit sizes, start up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace; and working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace. A clause should be added to note that this is subject to scheme viability. As a result, we do not consider the draft plan to be justified.			Comments noted. It is considered that the uses outlined within the representation relating to the Whitechapel Vision Masterplan SPD are entirely consistent with a LEL designation, and that the plan already offers sufficient flexibility in terms of the types of workspace and employment that is supported within LELs. It is not considered necessary to add 'subject to viability' text, as the policy supports and encourages delivery of such provision and as such does not present a requirement.

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635797	Greater London Authority		LP678	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	Yes		The Mayor supports the strong policies that protect employment space in the Preferred Office Locations and set out a strategy to enable growth of office floorspace, especially at Canary Wharf and City Fringe. This approach is reflected in the Central Activities Zone (CAZ) SPG and the emerging Isle of Dogs OAPF. The approach to protecting industrial land is also welcome.					Support noted.
1142716	Lyca Group		LP690	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	N/A			The Lyca Group site lies within the Tower Hamlets Activity Areas: Isle of Dogs Activity Area. As noted above, we suggest that a range of supporting uses are added to the draft site allocation 4.5. Our suggested additional uses are in line with the provisions of Policy S.EMP1 which seeks active bases of commercial buildings. We suggest the following text amendments are made to Policy S.EMP1 part 1 to enable the Tower Hamlets Activity Areas to deliver thriving places through a mix of uses where appropriate: The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for purpose-built office buildings with ground-floor retail and leisure uses. INSERT<The Tower Hamlets Activity Areas also provide opportunities for other uses including but not limited to residential, hotel and commercial.> The activity areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the neighbouring CAZ and Primary and Secondary POLs.				Comments noted. It is not considered necessary to add such text, given that other policies support and encourage the delivery of such provision

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1053510	Zeloof LLP and Truman Estates Limit		LP709	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No			2. Draft Policy S.EMP1 'Creating Investment and Jobs' 2.1. The draft policy recognises the ability of the identified Activity Areas (including the City Fringe) to accommodate substantial economic growth. This is supported. Supporting paragraph 5.17 suggests that a target mix of 20% employment floorspace in the activity areas. Whilst not strictly policy, this target is too low for the City Fringe which is tasked at a strategic level with delivering a substantial quantum of commercial floorspace. Accordingly, the target should be omitted for the City Fringe area, or increased to circa 50% which is more realistic to achieve the strategic growth targets. Note: no soundness test was undertaken	Yes		It is considered that 20% figure is a useful overall minimum target, given that the Tower Hamlets Activity Areas are more mixed in nature but encompass parts of other designations, such as the Whitechapel Local Employment Location, where a higher proportion of employment space would be anticipated.
1143308	Raycliff Whitechapel	Memery Crystal	LP796	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Effective		Draft Policy S.EMP1 'Creating investment and jobs' This draft policy confirms that development will be supported that: supports, protects and enhances the role and function of the Borough's designated employment locations, and maximises the provision of employment floorspace to meet the borough's target of creating 125,000 new jobs to 2031. It sets out the strategic aims of the LEL's including the opportunities for employment growth for secondary or specialist needs, and in CAZ Zone C, for a mix of uses, which includes office and other B class (employment) uses, with equal weight given to proposals for residential and employment or other strategic CAZ functions in these locations. The objectives of this policy are broadly supported in principle, particularly the statements that recognise the benefits of maximising and delivering investment and job creation. There should generally be greater weight for proposals that have the potential to deliver a significant number of jobs within these locations, recognising that these may not always fall directly within the standard or traditional employment 'B use classes'. This statement applies equally to Policy D.EMP2: New employment space. Further, the encouragement of a significant quantum of office and other employment floorspace relative to the surrounding context of a site, with a split of approximately 50% employment and other strategic CAZ uses and 50% other uses, which may include residential, is felt to be an ambiguous statement. This policy also appears to conflict with other draft employment policies and it is not clear which takes precedence, where for example the site in question sits within both an LEL and CAZ Zone C. As outlined above, it is considered that a focus on job creation (over B class floorspace), and an acknowledgement of the wider strategic functions of the CAZ within these areas would achieve the best outcome in these situations.	Yes		Comments noted. Regarding the marketing period, the council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the Council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. There is also considered to be no conflict between the LEL and CAZ zone C (tertiary zone) designation. It is considered that the council's approach to the CAZ zone C is justified and supported by evidence which has been prepared between regulation 18 and 19 stages. We recognise the need for mixed use development in CAZ zone C and support new residential development. The 50% threshold has been included in order to provide a useful guide to development and to protect the strategic function of the CAZ. However, please note that the policy wording of S.EMP1 will be amended to build in more flexibility and to recognise that proposals will be assessed on a site-by-site basis. The proposed modifications to policy S.EMP1 are set out below:

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												<p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
1142150	Tim Gaskell	Landowner Consortium and Aitch Group	LP82	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating	No	Effective			See attached letter	Yes		Comment noted. This response has been addressed in the site allocation section. We will not be reviewing the Strategic Industrial Location designation as this is set by the GLA within the London Plan.

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				Investment and Jobs								
1143324		Resolution Property plc	LP827	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Justified; Effective			Policy S.EMP1 (creating investment and jobs) defines secondary Preferred Office Locations (POL) and sets out the draft policy on residential development within secondary Preferred Office Locations. We welcome the recognition within the policy that secondary POLs can accommodate 25% residential development. However, we seek clarification on how the policy will be applied. At present it is unclear whether the 25% cap applies to individual development sites only, the POL or business campuses. To ensure that the integrity of secondary POLs are respected but that a suitable level of supporting residential accommodation is provided, we suggest that the 25% cap is applied across the secondary POL area. We therefore suggest that the wording of the policy is amended to reflect this. These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant weight is given to office and other strategic Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must not exceed 25% of the INSERT <designated secondary POL> area and must delete <robustly> demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.'	Yes		Comments noted. The employment thresholds within policy S.EMP1 do refer to individual sites. It is considered that these thresholds provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG (GLA, 2016) and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised. Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-

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											<p>led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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1143353	Greenland Hertsmer e (London) Ltd		LP875	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	N/A		The existing planning permission on the Spire London site is for a residential led mixed use scheme which reflects the planning policy designation at the time of the permission. At this time, on the adopted Policies Map (April 2013) the site lay outside of a designated Preferred Office Location. The site has subsequently been designated as Secondary POL in the emerging Local Plan. Given the absence of significant commercial floorspace in the permitted scheme, the allocation in Secondary POL and the policy designation is inconsistent with the permission granted. We therefore suggest that the planning policy allocation for the site is updated to remove the site from Secondary POL, which would match the residential led scheme which was permitted in 2016.				It is considered that the council's approach to the Secondary POL is justified and supported by evidence which has been prepared between regulation 18 and 19 stages. It is also consistent with the new draft London Plan. As such, the site will not be removed from the Secondary POL. However, please note that greater flexibility has been added to policy S.EMP1 where schemes deviate from the employment floorspace thresholds on a case-by-case basis. The proposed modifications to policy S.EMP1 are set out below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided , and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised . Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs . They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential

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												<p>uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace. 2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
1143353	Greenland Hertsmer e (London) Ltd		LP876	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	N/A			Greenland's Spire London site lies within the Tower Hamlets Activity Areas: Isle of Dogs Activity Area. We suggest the following text amendments are made to Policy S.EMP1 part 1 to enable the Tower Hamlets Activity Areas to deliver thriving places through a mix of uses where appropriate: The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for purpose-built office buildings with ground-floor retail and leisure uses. INSERT <The Tower Hamlets Activity Areas also provide opportunities for other uses including but not limited to residential, hotel and commercial.> The activity areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the neighbouring CAZ and Primary and Secondary POLs.				It is considered the plan already offers sufficient flexibility, and that uses other than employment can be supported within the Tower Hamlets Activity Areas. This is clearly set out in policy S.TC1.

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671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP899	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No				Policy S.EMP1: Creating Investment and Jobs Development which supports, protects and enhances the role and function of the borough's designated employment locations and maximises the provision of employment floorspace to meet the borough's target of creating 125,000 new jobs over the period to 2031 will be supported. The Huntington Estate is within the CAZ (Zone C) within which there are opportunities for some larger purpose-built office buildings and significant provision of office and other employment uses as part of mixed-use schemes which is supported. It is also noted that "Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations" which is supported. The priorities of the Opportunity Areas should also be noted within this policy to strengthen the support for delivery of employment within these areas. The policy also notes that proposals will be supported where they provide a range of workspace and unit sizes, start up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace; and working with affordable and shared workspace providers to bring forward affordable, flexible and shared workspace. A clause should be added to note that this is subject to scheme viability.			Support noted. It is considered that all local plan policies are viability tested and are also 'subject to viability'; therefore it is not considered necessary to add in this reference.
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP926	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	N/A			At present, this Policy S.EMP1 omits reference to site allocations, outside of the designated employment locations, that have employment uses as an identified land use. The 'Nondesignated employment sites' only refer to sites which have existing employment uses. Reference should be made to the contribution that such site allocations can make to the delivery of investment and job creation in the borough. The below addition to the Employment Location Table within this policy should be inserted under 'Other Locations'; Designated Employment Locations Other Locations Designation/ Role and Function Site Allocations identified for These sites can provide significant employment floorspace employment use and contribute towards the employment delivery of investment and job creation in the borough across a variety of sectors.			Comment noted. The representation incorrectly suggests that non-designated employment sites only applies to sites with existing employment uses; in fact, this is not the case as it applies to any site outside of those defined whether currently in employment use or not. This would therefore cover site allocations that are not within designated employment areas, THAA or town centres.	

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP947	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No			In regards to Policy S.EMP1, we propose the following additional text (as shown in red): Secondary Preferred Office Location (POL) - These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant weight is given to office and other strategic Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must not exceed 25% of the site area and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised. INSERT <Where development seeks to deviate from these policy requirements, applicants must provide justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.>			<p>Comments noted. It is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG (GLA, 2016) and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below. (Please note that policy D.EMP4 has now also been fully aligned to policy S.EMP1).</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floor-plates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided. and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing</p>

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											<p>employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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1053881	Sally Styles	C M A Planning Ltd	LP96	PART 3: POLICIES, 5.8 Paragraph Policy S.EMP1: Creating Investment and Jobs	No	Justified			S.EMP1 Creating Investment The designation of the Cambridge Heath LEL overlaps with the site allocation 1.3 Marian Place Gas Works and The Oval. This is confusing and could jeopardise the delivery of housing by introducing non-compatible uses into an area of the Borough that is principally allocated for new housing. The specifics of the site allocation can and do adequately direct the planning requirements for the site and as such a specific employment designation is not required or justified for the part of the Cambridge Heath LEL which is also covered by the site allocation. As set out in the supporting text to current Policy DM15, paragraph 15.4, the part of the policy (namely Part 1) which seeks to resist the loss of employment floorspace does not apply to site allocations and this approach should be carried forward to the new Local Plan. Suggested Amendment: Remove the area covered by the site allocation 1.3 from the proposed LEL.	Yes		Policy D.EMP4 makes clear that residential uses can be supported within the LELs. Policies S.EMP1.1 and D.EMP4.4e set the framework for the type of employment provision that is particularly welcomed within the Cambridge Heath LEL, reflecting existing and emerging character and corresponding with the employment designation across the boundary in Hackney. This approach is considered to be consistent with the requirements of the site allocation and would not undermine delivery of housing.
1143412		J P Morgan Chase	LP917	PART 3: POLICIES, 5.11 Paragraph	No	Justified; Consistent with national policy			Summary 1. In land use terms, the allocation for Riverside South identifies the site as falling within a preferred office location (secondary), which allows for a maximum provision of 25% housing floorspace. It is not considered that such a land use allocation is justified and accordingly the site allocation as currently drafted is considered to be unsound. 2. It is acknowledged that the Preferred Office Location boundary has been revised which provides greater flexibility in terms of land use mix, but the cap on the maximum housing floorspace is not justified, does not reflect the local circumstances and is inconsistent with national planning policy. 3. Riverside South is a unique site both in the context of the Isle of Dogs and also the Borough. It is a large brownfield site measuring over 2 hectares. It is on the edge of the Canary Wharf Estate and has a continuous frontage to the River Thames. The recent planning history of the site shows that it has huge capacity to deliver a large amount of floorspace for the Borough. It is evident therefore that the site can deliver a large proportion of the Borough's employment and/or housing targets. In addition, other scheme benefits relating to social, green and blue infrastructure can be delivered by this site. The arrival of the Elizabeth Line at Canary Wharf in 2018, in addition to on-going enhancements to existing public transport infrastructure will further increase the capacity of this site. Given the truly unique nature of this site to the Borough, it is important it is not arbitrarily constrained by rigid floorspace apportionments. 4. We consider the particular relevant material considerations below. The Location 5. Riverside South is located on the periphery of the Canary Wharf estate and sits outside the commercial core. This is acknowledged by Peter Brett Associates ('PBA') in their Preferred Office Locations Boundary	Yes		Comments noted. Regarding the proposed employment floorspace thresholds, it is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG (GLA, 2016) and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and

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									<p>Review (July 2017) report. PBA state "We note that whilst the area west of Westferry Road is also afforded a PTAL score of 5, the road which has a minimum of four lanes at this point creates a clear separation between the areas. The distinction between the areas east and west of Westferry Road/Circus is also evident in land use and building typology terms, with the landmark Canary Riverside residential/hotel complex in sharp contrast to the office buildings to the east. Thus, we conclude that Westferry Road is a logical delimiter of the Zone A area, with the area to the west of Westferry Road, but south of Westferry Circus being identified as Zone B. Whilst there could be longer term scope west of Westferry Road and north of the Limehouse Link either side of Milligan Street where there is largely low rise low density housing, Westferry Road acts as a very strong barrier at that point, firmly separating this area from the POL" (our underlining). 6. We note that the references to Zone A and Zone B areas in the PBA commentary above is in relation to Table 1.1 in the Mayor of London's CAZ SPG. We consider these zones further below in our representations. 7. In addition to this assessment of the area by PBA, it is noted that Riverside South is adjacent to residential to the east and south. In particular, to the east beyond Westferry Road is the Newfoundland site. This site benefits from a planning permission for 568 residential units (ref: PA/13/1455 and PA/13/1456). The building is currently under construction. The delivery of over 550 residential units on this site will further change the land use character in this area and create further separation between the Canary Wharf estate and the west of Westferry Road. Amongst other things the Committee Report in respect of the Newfoundland site states "The site is somewhat divorced from the main Canary Wharf estate by being located at a lower level and positioned at the western extent of the site". 8. In spatial and geographical terms, it is evident that the Riverside South site does not form part of the commercial core and as a matter principle should be considered suitable for a mix of uses. Indeed, by reference to Table 1.1 of the CAZ SPG, one might conclude that Riverside South sits within a more residential neighbourhood (Zone C), given the residential nature of the adjoining sites (rather than Zone B as concluded by PBA). The mix of uses 9. Having regard to the above it is clear the reallocation of the Riverside South site to allow a mix of uses is appropriate, as this part of the Isle of Dogs is increasingly mixed use in nature, however the identification of the site as a Secondary Preferred Office Location with its rigid 25% floorspace housing cap is not justified, and does not reflect the specific circumstances of the site, or the full potential of the site. 10. Further, such a rigid approach is</p>			<p>function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided. and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1</p>

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								<p>inconsistent with the CAZ SPG and reflects an inaccurate interpretation of this policy guidance. The PBA report - Preferred Office Locations Boundary Review - indicates that Riverside South falls to be within Zone B by reference to Table 1.1 of the CAZ SPG, where the priority/balance of land uses in this Zone is described as: "Offices and other CAZ strategic functions should be given greater weight relative to new residential" (our emphasis). The SPG confirms that such an approach reflects the importance attached to CAZ strategic functions in London Plan policies 2.10 and 2.11. We note policy 2.10 considers "Strategic Functions" and confirms the Mayor will and boroughs and other relevant agencies should inter a/ia "ensure that development proposals to increase office floorspace within the CAZ and the north of the Isle of Dogs Opportunity Area include a mix of uses including housing ... ". It is clearly the deliberate intention of the GLA not to specifically identify proportions of commercial and housing land uses within the defined zones. 11. PBA however attempt to quantify the "greater weight" guidance for Zone Band state "As a guide, and to help inform how we define the boundaries, our view is that for Zone B the Council should seek at least 75% office or other 'core CAZ' uses as part of any development proposal. This is on the assumption that this 75% will not be achievable on all sites, and other development management factors may reduce the final yield. But, starting at 75% should ensure that CAZ uses are predominant in the Zone B areas and active consideration is always given to the 'greater weight' for offices and other CAZ strategic functions in the Zone B area". (our underlining). 12. Having reviewed the PBA report, we conclude that the 25% maximum floorspace provision set out in the Riverside South allocation has been derived from the PBA analysis and based on their interpretation of the Mayor's guidance of what is meant by "greater weight" i.e. 75:25. However, as PBA acknowledge, such an apportionment was only formulated "as a guide ... to help inform". 13. Further, we note that PBA in their analysis were not suggesting a rigid cap as is now proposed by these policies, indeed the reserve is the case. PBA specifically say (para 1.9) "Due to the vagaries of individual sites it is not sensible to prescribe rigid targets and the broad percentages ... should be applied pragmatically to account for individual site circumstances" (our underlining). We would therefore suggest it is erroneous for the Council to adopt the rigid cap in the Local Plan. The proposed maximum housing floorspace cap is not therefore properly derived from the Council's Evidence Base and as a result the policy is considered unsound (including site allocation policy 4.11 and S.EMPI). 14. We are therefore concerned that such an interpretation not</p>			<p>and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p> <p>Please note that the response to site-specific issues at Riverside South is located within Part 4: Delivering Sustainable Places</p>

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									<p>only misrepresents the CAZ SPG in respect of Zone B, which simply seeks to give greater weight to offices and other CAZ strategic functions, but does not have regard to the specific circumstances of the Riverside South site. Further this rigid interpretation does not have proper regard to national and regional guidance, including the delivery of housing. In order to be "sound", the draft Plan has to be consistent with national policy. We note that the NPPF at paragraph 22 states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose." This NPPF guidance was also specifically referred to in the Committee Report for the Newfoundland permission (ref: PA/13/1455 and PA/13/1456). Accordingly, the rigid approach set out in the draft Local Plan renders the draft policy inconsistent with the NPPF and is therefore unsound. 15. We note that paragraph 1.14 of the PBA report confirms the tasks for their study are amongst other things to "define the Zone A and B boundaries". Such a task we consider is spatial in nature and should therefore not result in policy formulation relating to proportions of commercial and housing land uses on specific sites. Accordingly, it is concluded that the maximum housing floorspace cap for the Riverside Site is arbitrary given PBA's interpretation and this we consider renders the site allocation policy unsound because it is unjustified. 16. Even if one were to accept PBA's analysis that Riverside South falls to be in Zone B, as opposed to Zone C, the proposed arbitrary cap on housing floorspace may further adversely impact on the deliverability of this site, which has been undeveloped for many years. In addition the proposed rigid apportionment of land uses may not maximise the opportunity presented by this large vacant brownfield site. Further, paragraph 5.34 of the draft Plan, specifically contemplates less than 75% employment: "When there is a deviation below the 75% ". This supporting text is inconsistent with the rigid percentages proposed. We also note paragraph 5.11 refers to "greater weight" in Zone B. In other words, these explanations do not justify the rigid Policy; indeed they are contrary to the rigid policy. Accordingly the policy is unsound, as it is not properly justified, as required by NPPF. Commercial Floorspace 17. Planning permission for a major redevelopment of the Riverside South site was first achieved in 2005 (ref: PA/03/00377). Further applications were submitted and approved in 2008 (ref: PA/07/00935) and 2009 (ref: PA/08/02249) for similar, very large floorplate commercial buildings. It is relevant to note that a material operation under the 2009 planning permission was carried out within the specified time limit. A Certificate of Lawfulness confirming that</p>			

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									<p>operations commenced prior to the expiry of the planning permission was issued by the Council in November 2012. 18. It is noteworthy therefore that despite refining the commercial scheme through a number of separate applications (and amendments) JP Morgan has thus far opted not to build out the planning permission for the large scale office redevelopment scheme. This is due to a number of factors including economic conditions, changing market expectations, commercial demand and supply and political uncertainty. 19. The office schemes were designed prior to the 2008/2009 recession and market conditions since have shown that demand for such large floorplate offices in more peripheral locations is limited. This has also been evidenced by other commercial schemes in more peripheral locations on the Isle of Dogs which have been redesigned as a result. The demands in the area have changed, in a direct response to this economic shift. These revised schemes have in particular been redesigned to reflect changing market patterns and commercial demand in more peripheral locations. Further, it is also evident that commercial schemes now need to be designed to attract a broader mix of future tenants, including growing firms in the creative media, technology and telecommunications sector. It is clear therefore that the commercial accommodation at Riverside South will need to respond to the market, particularly given its more peripheral location. 20. It is also relevant to have regard to the evidence and Council's position in respect of the Newfoundland site, given its adjacency to Riverside South. We note that in respect of the Newfoundland application the Council commissioned Jones Lang LaSalle (JLL) to appraise the evidence in the form of a report prepared by CBRE (on behalf of the applicant). The main conclusions of the JLL report were as follows " the supply of office development within Tower Hamlets generally is significantly outstripping demand, between 2011 and 2031 it is anticipated that the demand for office supply within the borough will be 440,123sqm but there is almost 2million sqm in the pipeline {1,959,312sqm). Within the docklands specifically there is 21.5million sqft of office space in the pipeline but only 1.7million sqft of demand". 21. It is noted that 1.7million sqft of demand is 157,934 sqm. The 2009 Riverside South permission (ref: PA/08/02249/A) was for 341,924 sqm of office space i.e. the consented scheme on Riverside South is for more than twice as much office-space as there is demand for in all of Docklands. By reference to the NPPF paragraph 22, it is clear that based on current demand there is no "reasonable prospect" of the site being brought forward for a commercial led scheme. 22. The Council accepted the advice of JLL and the evidence put forward by the applicant and</p>			

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									<p>concluded that the redevelopment of the Newfoundland site for residential use would not undermine the policy objectives of the Core Strategy for employment and its use for residential was considered to be consistent with the NPPF. 23. We also note that the above is consistent with the PBA report Employment Land Review (2016) which quotes GLA data confirming that there is a "very large office supply pipeline" in the Borough. 24. Thus whilst it is accepted that the site is able to deliver a significant quantum of commercial floorspace, with the above in mind, it is evident that the site allocation policy for Riverside South should not be prescriptive in respect of the proportion of commercial floorspace the site can deliver. It is also noted that Policy S.EMPI requires "[robust evidence to demonstrate] that the supply of sufficient employment capacity to meet future needs is not being compromised". This is considered to be a much higher test than the CAZ SPG which sets out (at paragraph 1.3.10) a much wider set of considerations including viability of the long-term office use, marketability etc. The draft Policy is thus not consistent with regional policy. Housing 25. Turning to housing provision, we note that the Site Allocations Methodology Report (2017) forming part of the evidence base states "The site [Riverside South] is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will also make a significant contribution to meeting the boroughs employment target". 26. We are unclear how the figure of 500 units has been arrived at, because even if one were to accept the 25% cap, 25% of the permitted area indicates that more units could be delivered. Further, given the nature and scale of the Riverside South site, and by reference to Newfoundland site (providing 568 residential units on a 0.48ha site), it is clear that Riverside South could provide more than 500 units, whilst still making a significant contribution to meeting the borough's employment target. There are also other nearby sites which benefit from planning permission which would suggest that Riverside South can accommodate more than 500 units, including City Pride and Arrowhead Quay. 27. We are aware that there is a pressing need for additional housing across London, including housing growth within Tower Hamlets. The FALP increased the current housing target for the borough to 39,314 additional homes in Tower Hamlets up to 2025, and it is expected that the draft London Plan to be published later this month will further increase the housing targets for the Borough. The Borough must therefore seek to maximise opportunities for housing development in line with the London Plan and the NPPF, including making the most</p>			

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									<p>efficient use of those locations which are well served by public transport and can accommodate higher density development, such as Riverside South. The NPPF promotes the efficient use of land with high density, mixed-use development and encourages the use of previously developed, vacant and underutilised sites to achieve national housing targets as well as encouraging alternative uses on protected employment sites if there is no reasonable prospect of the site coming forward for employment use. 28. With this in mind, the 25% cap on housing floorspace is considered unjustified and not consistent with the NPPF. Further we note that the Council's Core Strategy and NPPF consistency review in March 2013, confirmed that the other uses for vacant employment sites in Preferred Office Locations would be considered on an individual basis taking account of other policies and the assessment of the prospects of employment use coming forward. This assessment was made for the Newfoundland site. The Newfoundland Committee report stated "The NPPF and the consistency review of the Local Plan do allow a consideration of uses of individual sites within the POL where they are currently vacant". Concluding Remarks 29. Having regard to the above commentary is clear that the 25% maximum housing floorspace land use requirement set out in the Riverside South allocation is unjustified and inconsistent with regional and national policy. Further, in the light of site specific and other strategic commercial and residential considerations, the proposed apportionment is unnecessary and may adversely impact on the overall objectives of the Plan. It is important that this site specific policy for Riverside South provides sufficient flexibility to deliver both the commercial and housing objectives of the Plan. 6. Please set out what change(s) you consider necessary to make the document legally compliant or sound. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. 30. In order to ensure the Local Plan is justified and consistent with national policy, the site allocation should allow a mix of uses including employment and housing to come forward. The housing content should not be constrained by the arbitrary 25% floorspace cap, which we understand arises from PBA's interpretation of "greater weight" set out in Table 1.1 of the CAZ SPG. Given the locational considerations and other material considerations outlined in respect of commercial and housing land uses in the area it is evident that the site allocation should not specify specific apportionments of land uses. Such flexibility will allow the opportunity of the site to be fully maximised and which will ensure</p>			

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									a number of the objectives of the Plan will be realised. 31. We propose that these policies better align with the CAZ SPG and remove the rigid 25% maximum housing floorspace target for Secondary Preferred Office locations. 32. These changes to the policy will ensure the policy is sound.			
1142186	Andrew Wood	Isle of Dogs NP Forum	LP142	PART 3: POLICIES, Figure 11 :Distributio n of employmen t hubs and locations	No	Positi vely prepa red			We are concerned that the proposed CAZ is too small and excludes large areas that are mainly employment led along South Quay. While only indicative, the GLA CAZ published in March 2016 covered a larger area than is proposed in the Local Plan. The concern is the loss of employment space (there are many offices in the area not in the CAZ) which encourages an over concentration on residential in the South Quay area. Many of the offices along Marsh Wall offer a wider variety and pricing of office space than those offered in Canary Wharf. The CAZ now mainly includes Canary Wharf Group estate office space (or space in which it has an interest). This space is not sufficient to support local, small and medium enterprises contrary to later sections of the Local Plan. The new CAZ does not support economic development within the IoD and is, therefore, unsustainable in terms of the Area's development needs. The Council should be committed to enhance the provision of more affordable workspace, given that this would: - 1. Enable local unemployed and under-employed people to establish their own businesses. 2. Support the expansion of existing businesses. 3. Retain in the Borough existing businesses as they expand. 4. Attract new businesses to Tower Hamlets. 5. Allow voluntary and community organisations to deliver vital services from premises within the Borough.	Yes		Comments noted. It should be noted that the north of the Isle of Dogs is not within the CAZ, but is "functionally related" to it. While it is acknowledged that South Quay is illustratively included within the GLA's CAZ SPG area, the council's evidence assessed that due to the nature of recent and proposed development around South Quay (predominantly residential) it does not accord with the CAZ SPG guidance for 'Zone B'. Zone C only exists within the CAZ. However, the 'Tower Hamlets Activity Area' designation and more stringent evidence requirements to justify loss/reduction of floorspace as part of redevelopment proposals means that new and re-provided employment floorspace at South Quay is encouraged, and this approach contributes to the objectives of the CAZ SPG in terms of delivering additional jobs and floorspace to meet need. The plan also encourages provision of affordable/flexible workspace.
635342	Aggregate Industries UK Limited		LP489	PART 3: POLICIES, Figure 11 :Distributio n of employmen t hubs and locations	No	Effect ive; Consi stent with natio nal policy			To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan Fig 11 should detail the full extent of the safeguarded Bow West rail site. Required change: The full extent of the Bow West "Safeguarded Rail Site" should be added to Figure 11.	Yes		We do not consider that it is appropriate to show the safeguarded rail site on the Polices Map and figure 11 given that is not within Tower Hamlets planning authority area.
635711	London Concrete Ltd		LP490	PART 3: POLICIES, Figure 11 :Distributio n of employmen t hubs and locations	No	Effect ive; Consi stent with natio nal policy			To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan Fig 11 should detail the full extent of the safeguarded Bow West rail site. Required change: The full extent of the Bow West "Safeguarded Rail Site" should be added to Figure 11.	Yes		We do not consider that it is appropriate to show the safeguarded rail site on the Polices Map and figure 11 given that is not within Tower Hamlets planning authority area.

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624580	Jason Larkin	Canary Wharf Group Plc	LP522	PART 3: POLICIES, Figure 11 :Distribution of employment hubs and locations	No	Positively prepared; Justified; Effective			We also note that draft Local Plan Figure 11: 'Distribution of employment hubs and locations' does not include the North Quay site within the Canary Wharf town centre. This is inconsistent with the Adopted Local Plan Policies Map as well as the 'Tower Hamlets Town Centre Strategy 2017 to 2022 (March 2017) evidence base document (Appendix 10) which both show a wider area for the Canary Wharf town centre that Figure 11. Figure 11 should therefore be updated to reflect the correct extent of the Canary Wharf town centre boundary. In addition Figure 11 illustrates that Central Activities Zone within the City Fringe but not in the North of the Isle of Dogs			Comments noted. Being the employment chapter, figure 11 does not show the Canary Wharf town centre boundary, only the employment designations. With regards to the north of the Isle of Dogs boundary (the pink boundary on the map), it is accepted that this boundary needs amending. Therefore, figure 11 will be updated to ensure that the north of the Isle of Dogs boundary follows the outer POL boundary as recommended within the POL Boundary Review (2017).
829908	Andrew Wood		LP98	PART 3: POLICIES, Figure 11 :Distribution of employment hubs and locations	No	Effective			The CAZ and Secondary office location boundaries on the IoD are drawn too tightly The issue is the nature of office space available along South Quay which being more suited to smaller, less profitable organisations covers a wider range of businesses than are currently or likely to be based in the Canary Wharf Group estate. It forces a concentration of business types into large office spaces when along South Quay there is a much wider range of business types and space especially in Skylines. That does not meet the economy test in the NPPF The LP treats all office space as being the same, it isn't The CAZ should be larger (based on the GLA SPG from March 2016) and provide more flexibility for residential within the CAZ i.e. a higher % of space than 25%. That would encourage a better mix of activities. For example currently at South Quay DLR station in morning rush hour you have passengers arriving to enter nearby offices and passengers leaving for offices elsewhere. If South Quay becomes all residential that DLR station won't be able to cope as the traffic will be one way. Similar examples could be given for example sandwich shops, they depend on the lunchtime office trade but are also open in the evening for residents. It would be more sustainable to have a broader mix of activities in a wider area than a sharper concentration in smaller spaces.	Yes		While it is acknowledged that South Quay is illustratively included within the GLA's CAZ SPG area, the council's evidence assessed that due to the nature of recent and proposed development around South Quay (predominantly residential) it does not accord with the CAZ SPG guidance for 'Zone B'. However, the 'Tower Hamlets Activity Area' designation and more stringent evidence requirements to justify loss/reduction of floorspace as part of redevelopment proposals means that new and re-provided employment floorspace at South Quay is encouraged, and this approach contributes to the objectives of the CAZ SPG in terms of delivering additional jobs and floorspace to meet need. The Tower Hamlets Activity Area designation in place in this area promotes the mix of uses cited.

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1142064	Lucy Rogers		LP35	PART 3: POLICIES, 5.16 Paragraph	No	Justifi ed			if small businesses are important to the borough why are no additional areas for local employment appearing in the places west of the borough near the city? Office development should not have continued priority. It's not sustainable to only encourage big business throughout such an extensive area, with local business confined to smaller places. It's not justified because it goes against the borough's own principles (sharing growth, sustainable development) and the alternatives have not been tested. Also the number of industrial zones is pitifully small. More industrial sites need to be found and protected. EG Hamlets Industrial Estate (in Hackney Wick), railway arches, and so on.	No	NPPF para 7 7. There are three dimensions to sustainable development: economic, social and environmental. • an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; para 17 • proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take	It is not considered necessary to designate further areas. Already in the west of the borough a new LEL has been identified at Cambridge Heath; the LEL (currently LOL) at Whitechapel has been extended and the extent and focus of the POLs has been re-defined and extended. A range of employment spaces are explicitly supported within those areas, not just offices. Furthermore, it is not considered necessary to designate further industrial locations. The plan designates two additional LILs, and maintains protection of existing LILs and SILs. The policy on loss of employment has been strengthened which will benefit provision of industrial space elsewhere in the borough.

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											<p>account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; para 21 ● set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; ● support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; Add itional sites need to be set out for local employment and industrial land.</p>	

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635414	City of London		LP575	PART 3: POLICIES, 5.16 Paragraph	Yes		The City Corporation supports the protection of industrial sites and recognition that such sites serve the long-term needs of the borough and the role of the City of London and Canary Wharf as global economic hubs. This could include provision for waste sites, sites for storage and distribution and industrial uses which are essential to serve central London and Canary Wharf.					Support noted.
1142035		Hermes Property Unit Trust	LP166	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	Yes			Policy D.EMP2: New employment space The policy should make allowance for the rationalisation and/or re-provision of employment generating floorspace on allocated sites which meet current demands, and especially that create additional employment opportunities. It is considered that a measure of floorspace is too rigid and does not mirror the spirit of the National Planning Policy Framework on making the best use of land. Moreover, and as highlighted above, some of the proposed allocated sites, in particular, Thomas Road, are now located adjacent to high density and high quality residential developments, thus creating a conflict between uses in amenity and highways terms. This in our view, runs contrary to other policies in the Plan that seek to protect amenity and move away from bad neighbour uses.		Yes		It is considered that the council's evidence on the protection of floorspace for industrial uses is strong and accords with the new draft London Plan. It is also considered that industrial uses, especially of the type typically found within LILs, are not necessarily incompatible with surrounding residential uses.

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1054236	EID Partners hip		LP182	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	N/A			We support LBTH's ambition to deliver new employment floorspace in designated employment areas and the Tower Hamlets Activity Areas. However, we suggest that greater consideration is given to the range of employment uses which may come forward in the future and that the policy wording of part 6 of Policy D.EMP2 is reworded as suggested below to support evolving ways of working, and enable the co-location of compatible employment and supporting uses including residential where appropriate. 6. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not may be supported as part of a wider mix of living and working spaces.				Policy EMP2.6 is considered to be appropriate in line with the justification set out in paragraph 5.26.
635451	National Grid Property Holdings		LP192	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No	Justified; Effective			Part 4 of this Policy is neither justified nor effective as it makes a requirement that at least 10% of new employment floorspace should be provided as affordable workspace yet it does not take into consideration the issue of viability. Requiring the provision of affordable workspace may make a scheme unviable. Paragraph 173 of the National Planning Policy Framework requires "the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". Therefore it is critical that similar to the Borough's proposed policy on affordable housing the provision of affordable workspace only occurs where it is viable to do so. To make the policy sound, part 4 should be reworded to state, "within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace, subject to viability."	Yes		A viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Proposed modifications to paragraph 5.24 are set out below: Paragraph 5.24: Part 4 seeks to ensure that major development (i.e. W which comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all

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												cases, the applicant will be required to provide details of management arrangements as part of the planning application.
1142365		Newport Holdings Ltd	LP226	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Draft Policy D.EMP2: New Employment Space Draft Policy D.EMP2 requires under part 4 that "within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace". The supporting text sets out that evidence should be provided by applicants of an agreement to let the floorspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. We question the justification for this % provision and the soundness of this proposed policy in the absence of the necessary evidence. There is also no reference to the type of accommodation or, critically, the viability of such approach and there is an absence of clarification that this should be applied to the net additional floorspace only i.e. a scheme which simply re-provides existing (and unrestricted) office floorspace with no net uplift should not reasonably be required to meet this requirement, particularly as it will not be viable in a number of cases. In London boroughs such as Islington the requirement for	Yes		Comments noted. It is accepted that the justification for the 10% affordable workspace figure should be made clearer; therefore, further evidence on the rationale behind this requirement has been undertaken. The policy adopts a borough wide approach to the affordable workspace thresholds (which provide the default position), but proposals will be developed and assessed on a case-by-case basis which will take into account locational factors. Regarding the viability of this policy, a viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Furthermore, the supporting text in paragraph 5.24 has been amended to provide further detail and clarification in terms of: <ul style="list-style-type: none"> • clarity over 'major commercial development' and 'gross' floorspace; • clarity over the application of the policy in terms of the need to work closely with our enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process; and • greater flexibility should the applicant wish to manage the space independently or with a provider not on our approved list. Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition. <p>Proposed modifications to paragraph 5.24 are set out below:</p> <p>Paragraph 5.24: Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local</p>

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								<p>affordable workspace is applied to the net additional office floorspace only. The policy also allows for it to be provided either as small units (generally below 90sqm) which, by their size, are suited to SMEs, or via a discount rent (as is proposed above). We consider this flexibility should be built into the policy, with the critical need to reference the 'net additional floorspace' and that this is 'subject to viability'. In order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.</p>			<p>businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.</p> <p>Insert the following definition for affordable workspace into the glossary:</p> <p>“flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms: accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs; • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).”</p>

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624910	Sir or Madam	Telford Homes PLC	LP263	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No			Draft Policy D.EMP2 requires major commercial and mixed-use schemes to provide 10% affordable workspace. Whilst this is considered to be sound in spatial planning principles, consideration should be given to the viability of individual applications. In addition, there is no definition provided with regard to 'major commercial and mixed-use schemes'. Therefore, a minimum threshold should be set to define this, as it would not be appropriate and/or viable for all mixed-use schemes to provide this within their proposals. The supporting text of this draft policy fails to consider the viability of individual schemes to bring forward this requirement and in some instances could have an impact on the deliverability of sites coming forward. In addition, it is not cognisant of other obligations the Local Plan proposes such as affordable housing on mixed use schemes, which similarly will have an impact on deliverability.			A viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Proposed modifications to paragraph 5.24 are set out below: Part 4 seeks to ensure that major development (i.e. W which comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.

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1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP335	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	N/A			The policy sets out that new and intensified employment floorspace will be supported in designated employment areas, including the CAZ as set out in S.EMP1. The policy notes that 10% of employment space provided as part of major commercial and mixed use schemes will be affordable. The supporting text to this policy notes that applicants must provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. It should be noted within the policy wording that this is subject to viability. It should be noted that the term 'affordable' is flexible in this regard as it can relate to rent, lease length and size of the accommodation provided. It is not clear from the current wording how affordable business space is defined and whether it is applied generically across the Borough or within specific areas. The wording of the policy should be amended to include market rates achieved at the development rather than general market rates.			<p>Comments noted. Regarding the viability of this policy, a viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Furthermore, the supporting text in paragraph 5.24 has been amended to provide further detail and clarification in terms of:</p> <ul style="list-style-type: none"> • clarity over 'major commercial development' and 'gross' floorspace; and • clarity over the application of the policy in terms of the need to work closely with our enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process. <p>Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition.</p> <p>Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a</p>	

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												<p>provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.</p> <p>Insert the following definition for affordable workspace in the glossary:</p> <p>“..flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms:</p> <p>accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs;</p> <ul style="list-style-type: none"> • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).”
1054350	Frasers (Central House) Ltd		LP357	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No	Positi vely prepa red; Justifi ed; Effect ive			LBTH’s approach to affordable workspace provision is outlined in Policy D.EMP2. The policy proposes that once the Local Plan is adopted, 10% of employment space provided in new developments should be affordable. Frasers welcomes an approach that offers opportunities for a range of businesses to access workspace. However, it is not clear from the draft Local Plan or the evidence base how the figure of 10% affordable workspace provision has been calculated. We understand from the Growth Sectors and SMR Workspace Study (2017) that LB Hackney has adopted a 10% requirement for affordable workspace within major commercial development schemes and new mixed-use schemes in the Borough’s designated employment areas. Whilst it is noted that this is the adopted position in LB Hackney, no justification has been provided why this would be appropriate within LBTH. A blanket 10% which does not take account of the type of office accommodation approved, the quantum or the location is an inflexible and arbitrary approach to policy and one that does not demonstrate an appropriate strategy to facilitating development that responds to the Borough’s development needs. It is not clear whether reasonable alternatives to the 10% figure have been considered. Affordable Workspace – Policy D.EMP2 is not justified as it fails to evidence why 10% is an appropriate quantum for	Yes		<p>It is accepted that the justification for the 10% affordable workspace figure should be made clearer; therefore, further evidence on the rationale behind this requirement has been undertaken. Furthermore, amendments have been made to the supporting text to further emphasise that proposals will be assessed on a case-by-case basis which will take into account locational factors. Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers</p>

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									LBTH. In response to the above we would propose: 2 The preparation of evidence to justify the 10% quantum and an amendment to the Policy if necessary to reflect the evidence.			(for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.
1142493		Berkeley Group	LP407	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employem t space	No				D.EMP2: New employment space Part 2 of the policy should include Opportunity Areas and Site Allocations.. Part (4) should be removed Soundness test: Positively prepared - strategic locations and allocations should have the flexibility to provide appropriate employment generating uses. Not deliverable - not effective, affordable workspace has not been viability tested for site allocations.	Yes		Comment noted. It is not considered necessary to make such a change because not all site allocations or parts of opportunity areas will be appropriate for employment use.
624580	Jason Larkin	Canary Wharf Group Plc	LP523	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employem t space	No	Justified			Part 4 of the draft policy seeks that all major commercial and mixed-use development schemes deliver 10% of the total floorspace as affordable workspace. Affordable workspace is defined as being affordable by tenancy rates offered at least 10% below indicative market rates of for a minimum period of ten years. We recognise the need for employment space suitable for start-ups or growing businesses however we do not agree that this policy approach is the appropriate way in which to deliver this type of space. Applying this broad approach could limit the ability to deliver office space for particular types of occupiers. The 'Tower Hamlets Growth Sectors and SME Workspace Study' (2017) forms the evidence to support the draft policy. The findings of this study include a number of recommendation to ensure the delivery of workspace within the borough. One of these recommendations is the development of a specific policy guiding workspace provision. However, the approach taken by the Council within the current drafting of this policy does not reflect the wider findings set out within this study. For example, the study considers the variations in demand for workspace spatially across the borough and the range in demand from workspace operators. This blanket 10% of floorspace approach would not achieve the required outcome to deliver workspace in accordance with the finding in this study. Therefore in order to be justified, part 4 of the draft policy should be revised as follows: "Within major commercial and mixed-use development schemes, INSERT < the Council will seek a proportion > DELETE < at least 10% > of new			It is accepted that the justification for the 10% affordable workspace figure should be made clearer; therefore, further evidence on the rationale behind this requirement has been undertaken. The policy adopts a borough wide approach to the affordable workspace thresholds (which provide the default position), but proposals will be developed and assessed on a case-by-case basis which will take into account locational factors. More information on locational factors are also contained within the new evidence base. Proposed modifications to paragraph 5.24 are set out below: Part 4 seeks to ensure that major development (i.e. W which comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers

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								employment floorspace should to be provided as affordable workspace. INSERT < The proportion to be provided will take into account local demand for affordable workspace as well as the delivery of other objectives for the site and of this Plan>			(for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.
1142691		Alliance Property Asia	LP609	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No			POLICY D.EMP2: NEW EMPLOYMENT SPACE The policy sets out that new and intensified employment floorspace will be supported in designated employment areas, including the CAZ as set out in S.EMP1. The policy notes that 10% of employment space provided as part of major commercial and mixed use schemes will be affordable. The supporting text to this policy notes that applicants must provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. The percentage and time restriction should be removed from the policy as it could have a dramatic effect on the viability of the scheme. It should be noted that the term 'affordable' is flexible in this regard as it can relate to rent, lease length and size of the accommodation provided. It is not clear from the current wording how affordable business space is defined and whether it is applied generically across the Borough or within specific areas. Further clarity is requested on this matter. Note: No soundness test undertaken.	Yes		<p>Comments noted. Regarding the viability of this policy, a viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Furthermore, the supporting text in paragraph 5.24 has been amended to provide further detail and clarification in terms of:</p> <ul style="list-style-type: none"> • clarity over 'major commercial development' and 'gross' floorspace; • clarity over the application of the policy in terms of the need to work closely with our enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process; and • greater flexibility should the applicant wish to manage the space independently or with a provider not on our approved list. Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition. <p>Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Which comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such</p>

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												<p>cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application. Glossary addition for affordable workspace: "flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms: accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs; • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s)."</p>

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1054252	Londone wcastle	Londone wcastle	LP625	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No	Effective			The policy sets out that new and intensified employment floorspace will be supported in designated employment areas, including the CAZ as set out in S.EMP1. The policy notes that 10% of employment space provided as part of major commercial and mixed use schemes will be affordable. The supporting text to this policy notes that applicants must provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. The policy must acknowledge that this will have an impact on viability. On truly mixed use schemes this policy would have an impact on the amount of affordable housing that could be provided. It should be noted that the term 'affordable' is flexible in this regard as it can relate to rent, lease length and size of the accommodation provided. It is not clear from the current wording how affordable business space is defined and whether it is applied generically across the Borough or within specific areas. Further clarity is requested on this matter. The policy must also allow consideration of site specific circumstances and for a flexible approach to adopted. As a result, we do not consider the draft plan to be effective.			<p>Comments noted. Regarding the viability of this policy, a viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Furthermore, the supporting text in paragraph 5.24 has been amended to provide further flexibility and clarification in regards to affordable workspace definitions and approach to its application. This includes clarity over the application of the policy in terms of the need to work closely with our enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process. Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition.</p> <p>Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to</p>

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												<p>provide details of management arrangements as part of the planning application.</p> <p>Insert the following definition for affordable workspace in the glossary:</p> <p>“flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms:</p> <p>accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs;</p> <ul style="list-style-type: none"> • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).”
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP654	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	Yes		Policy D.EMP2: New employment space We fully support the principle that at least 10% of new employment floor space should be provided as affordable workspace (even if we disagree below over how affordable it is). We know many small businesses looking for space but either cannot find any space at any price or find that it is not affordable. We are extremely short of space. The plan should also preserve the current affordable work spaces			Yes		Support noted.

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1142716	Lyca Group		LP686	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	N/A			Policy D.EMP2: New employment space We support LBTH's ambition to deliver new employment floorspace in designated employment areas and the Tower Hamlets Activity Areas. However we suggest that greater consideration is given to the range of employment uses which may come forward in the future and that the policy wording of part 6 of Policy D.EMP2 is reworded as suggested below to support evolving ways of working, and enable the co-location of compatible employment and supporting uses including residential where appropriate. 6. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) delete <will not> may be supported INSERT<as part of a wider mix of living and working spaces.?				Policy EMP2.6 is considered to be appropriate in line with the justification set out in paragraph 5.26.
1053510	Zeloof LLP and Truman Estates Limit		LP710	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No				3. Draft Policy S.EMP 1 'D.EMP2: New employment space' 3.1. The draft policy recognises the need to intensify employment floorspace in identified Tower Hamlets Activity Areas, this is supported. The draft policy also seeks to introduce a requirement to provide affordable workspace for major employment schemes. Whilst the principle of this is supported, the policy should define whether this is applicable to net or gross floorspace. In addition, the draft policy should contain sufficient flexibility in circumstances where this cannot be provided on-site, such as where a tenant intends to occupy all the floorspace or where the development is not practically able to be delivered with separate tenanted demises. The draft policy should also allow the applicant or owner of the building to manage the affordable workspace independently providing this is on terms agreed by LBTH. Note: no soundness test was undertaken.	Yes		<p>Comments noted. The supporting text in paragraph 5.24 has been amended to provide further detail and clarification in terms of:</p> <ul style="list-style-type: none"> • clarity over 'major commercial development' and 'gross' floorspace; • clarity over the application of the policy in terms of the need to work closely with our enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process; and • greater flexibility should the applicant wish to manage the space independently or with a provider not on our approved list. <p>Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition.</p> <p>Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of</p>

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												<p>agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.</p> <p>Insert the following definition for affordable workspace in the glossary:</p> <p>“flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms:</p> <p>accessible to a wide range of users including but not limited to local residents, start-up entrepreneurs SMEs;</p> <ul style="list-style-type: none"> • substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; • at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and • at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s).”

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671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP900	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No				Policy D.EMP2: New employment space The policy sets out that new and intensified employment floorspace will be supported in designated employment areas, including the CAZ as set out in S.EMP1. Within major commercial and mixed-use development schemes, at least 10% of new employment floorspace will be affordable workspace. Para 5.24 states that this should be applied where over 1,000 sqm of commercial floorspace is proposed, and applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than 10 years. As noted above, we would suggest wording is added to note this is subject to scheme viability.			<p>A viability assessment has been undertaken which proves that this policy is viable and this will be summarised within the new evidence base. Nevertheless, a reference has been added to the supporting text in paragraph 5.24 to make it clear that this policy is 'subject to viability'. Proposed modifications to paragraph 5.24 are set out below:</p> <p>Part 4 seeks to ensure that major development (i.e. Wwhich comprises of at least 1,000 square metres of gross commercial floorspace relating to B1, B2 and B8 uses) provides sufficient affordable workspace to meet the needs of more local businesses as well as start-ups (44). In such cases, applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years. Applicants should work with our employment and enterprise team and recognised affordable workspace providers (for which we hold an approved list) to determine the scale and nature of the affordable workspace provision on a case by case basis, subject to scheme viability providing details of management arrangements. As an alternative, an applicant may wish to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms. In all cases, the applicant will be required to provide details of management arrangements as part of the planning application.</p>

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP928	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	N/A			At present, Policy D.EMP2 omits reference to site allocations that have employment uses as an identified land use, outside of the designated employment areas and Tower Hamlets Activity Areas. For site allocations outside of these areas the following tests set out in part 3 of this Policy would have to be met. It is proposed that all sites allocated for employment land uses are omitted from this requirement, by amending the policy as set out below:" 1. New or intensified employment floorspace will be supported within designated employment areas and the Tower Hamlets Activity Areas, as set out in policy S.EMP 1. 2. Outside of designated employment areas and Tower Hamlets Activity Areas, new employment space will be directed to designated town centres, and accessible locations along major transport routes and site allocations identified as suitable for employment floorspace. 3. New employment space will be supported at other locations to those specified in parts 1 and 2 above if: a. it can be demonstrated that there is a reasonable prospect of occupancy; b. the employment use would contribute towards integrated place making; c. the area forms part of a cluster of similar employment uses; or d the employment space is being provided as part of a temporary use. 4. Within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace. 5. New employment space must be completed to a standard which meets the needs of potential end users. 6. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported "				Comment noted. The policy and supporting text will be amended to include employment space within site allocations: 1. New or intensified employment floorspace will be supported within designated employment areas locations , and the Tower Hamlets Activity Areas, as set out in policy S.EMP1 and identified site allocations .

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP950	PART 3: POLICIES, 5.21 Paragraph Policy D.EMP2: New employment space	No				Policy D.EMP2 (New employment space) We support LBTH's ambition to deliver new employment floorspace in designated employment areas and the Tower Hamlets Activity Areas. However we suggest that greater consideration is given to the range of employment uses which may come forward in the future and that the policy wording of part 6 of Policy D.EMP2 is reworded as suggested below to support evolving ways of working, and enable the co-location of compatible employment and supporting uses including residential where appropriate. 6. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) DELETE <will not> INSERT <may> be supported INSERT <as part of a wider mix of living and working spaces.>			Policy EMP2.6 is considered to be appropriate in line with the justification set out in paragraph 5.26.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP141	PART 3: POLICIES, 5.24 Paragraph	No	Effective			The Forum has concerns over the lack of affordable workspace. For residential properties, the London Plan recommended a 20% reduction across London for rent to be deemed affordable but in Tower Hamlets POD rents were typically around 55-60% of market rents, and have recently been reduced further in order to ensure they are affordable. We do not think that a 10% reduction is affordable and will not, therefore, attract businesses that need affordable workspace.	Yes		The concerns of the forum are noted and the council would seek as much affordable employment provision as possible. Please note that the 10% discount is seen as a minimum only and the starting point for negotiations on a site-by-site basis which will take into account locational factors. It should also be noted that previous feedback has suggested that flexibility is more of a concern for many start-ups and SMEs than affordability; therefore, the plan also supports flexible workspace. Our position on affordable workspace is now set out within the new evidence base.
1142035		Hermes Property Unit Trust	LP167	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	Yes			Policy D.EMP3: Loss of employment space For the reasons given in our representations to Policies S.EMP1 and D.EMP2 above, we object to Policy D.EMP3. The policy is considered to be too rigid in protecting floorspace without any consideration to the re-provision of floorspace that provides a qualitative and moreover, increased number of jobs, which in our view is what, should be the principal purpose of the policy.		Yes		It is considered that the council's evidence on the protection of floorspace for employment uses is strong and accords with the new draft London Plan.

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1142199		CBRE	LP171	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Effective			<p>Whilst we acknowledge the Council's desire to protect office space within the borough from redevelopment and/or change of use, we believe that there are circumstances where an inflexible approach to the protection of office space is at odds with/precludes the fulfilment of other important objectives of the Plan. We act for a number of clients whose core business is the London office market. We therefore have a strong understanding of the existing office market and where it is heading in the future. A core requirement for modern businesses is access to complementary business uses such as retail, entertainment and leisure uses, and these facilities are expected to be more and more important for office occupiers moving forward. As currently drafted, Policy D.EMP3 does not support the introduction of these complementary business uses, which we believe are essential to sustain and promote the growth of office space in the borough. There are a number of objectives and draft policies within the Plan which do support the business needs identified above. These include:</p> <ul style="list-style-type: none"> • Key objective 1: Managing the growth and shaping change – part 7 relates to strengthening the role of town centres to encourage a broad range and mix of uses and activities to meet the needs of users. • Policy S.SG1: Areas of growth and opportunity within Tower Hamlets – part 6 relates to Canary Wharf and the City Fringe, which will continue to act as a key focus for financial and business services. • Policy D.DH2: Attractive streets, spaces and public realm – part 2 requires development to positively contribute to the public realm by optimising active frontages towards public streets and spaces. • Policy S.EMP1: Creating Investment and Jobs – part 2 states that proposals will be supported which provide opportunities to maximise and deliver investment and job creation in the borough through a) supporting and promoting the competitiveness, vibrancy and creativity of the Tower Hamlets economy; and b) protecting the borough's global, national, regional and local economic roles in delivering jobs and supporting businesses. • Policy S.TC1: Supporting the network and hierarchy of centres – this policy requires development to support the role and function of the borough's town centre hierarchy. It acknowledges the need for retail, entertainment and leisure uses alongside employment, and encourages a mix of uses (day and night) to promote vibrancy, economic vitality and variety. • Policy D.TC5: Food, drink, entertainment and the night-time economy – states that cafés, restaurants and drinking establishments (use classes A3, A4 and AA) will be supported within the Central Activities Zone, Major Centre, Tower Hamlets Activity Areas, District Centres and Neighbourhood Centres. To best meet the needs of modern business, and 	Yes		<p>Comments noted. It is considered that the current approach is appropriate - the council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. Furthermore, part b of policy D.EMP3.2 gives some flexibility which could be applied where there alternative use is clearly beneficial to meeting other objectives. The supporting text in paragraph 5.30 will be amended to provide more clarity on alternative uses, see below:</p> <p>It is recognised that, in some cases, requiring 24 months marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that reprovided employment space as part of redevelopment would not be viable. It should also be demonstrated that the proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses. The report should also demonstrate that the benefits of an alternative use would outweigh the benefits of the employment use to meet other local plan objectives, such as the need for complimentary town centres uses or to maintain active frontages within town centres.</p>

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									therefore to ensure the sustainability and growth of office space within the borough, we suggest that the draft policy wording is amended to include an additional point which could state: "4. At ground floor level, it may be appropriate for some employment floorspace to be replaced by alternative town centres uses within town centres (which includes the Central Activities Zone)". The supporting text to the policy could also be extended to include the text along the lines of the following: "Whilst the purpose of Policy D.EMP3 is to protect existing employment floorspace, the Council acknowledges that there are circumstances within town centre locations (including the Central Activities Zone) where it will be appropriate to introduce complementary town centre uses in place of existing employment space. Such town centre uses include retail, cafes/restaurants, bars and leisure uses. These uses provide a critical complementary and supporting function to businesses which help to sustain employment floorspace and encourages further employment growth. Such uses are typically provided at ground floor level where they benefit from footfall and visibility, whilst also contributing to activity and vibrancy at street level." Overall, we believe that the proposed amendment to Policy D.EMP3 will: 1. Promote rather than compromise the sustainability and growth of office space within town centres; and 2. Support the objectives of the Plan's economic and town centre policies.			
1054236	EID Partners hip		LP183	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	N/A			Policy D.EMP3 currently reads: 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the				Comments noted. The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.

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								<p>benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. Part 2 of Policy D.EMP3 resists the loss of existing employment floorspace in locations outside of those allocated for employment uses, unless they can meet specific criteria detailed in parts a and b. The approach to protecting allocated employment sites should be consistent with the NPPF (paragraph 22) which states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." As such, Policy D.EMP3's current stance is likely to restrict necessary redevelopment whilst disregarding the purpose of including designated employment areas within the Local Plan. Furthermore, whilst we acknowledge the importance of protecting viable employment floorspace in the Borough, we suggest that the insistence of a minimum 24 month evidence period proving active marketing has taken place as stated in part b is excessive and should be reduced to 6 months. The current wording of the policy could be prohibitive to development, resulting in potential vacant buildings which could otherwise be brought forward into active use through mixed use development. Considering the above, we therefore suggest Policy D.EMP3 (Loss of employment space) is amended to the following:</p>				

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							<p>1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least 24 months 6 months at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. 4. Development leading to the loss of employment floorspace will not be considered to be harmful where that same quantum of floorspace has already been provided as part of a net intensification across the wider employment site.</p>				

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1142289		356 ACQ Limited and Millharbour ACQ Limited	LP196	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Positively prepared; Justified; Effective; Consistent with national policy			Loss of Employment Uses Emerging Policy D.EMP3 relates to employment in the Borough in respect of applications which propose the loss of existing employment areas. Adopted planning policy relating to the loss of employment uses includes exception criteria for site allocations, in order to ensure that the deliverability of the allocations is not compromised through onerous restrictions. There is a specific reference in the reasoned justification within the Managing Development Document which states that the Council recognise that the nature of uses proposed on site allocations requires a change from the existing uses and therefore Part (1) of the employment policy, relating to a specific marketing or employment land review exercise, should not apply. We recommend that in order to be effective and ensure that the deliverability of the scale of development anticipated through the emerging Plan is satisfied, the exception criteria for site allocations is retained through either adopted policy or reasoned justification for Policy D.EMP3 There is recognition through Paragraph 5.30 of the emerging Plan that applicants will need to justify that any proposed development within a site allocation would need to demonstrate that it would not prejudice wider land-use objectives or the delivery of site allocations. However we would suggest that recognition is given to the situation where excess office floorspace within the site allocation is no longer required. In these scenarios, under the currently proposed wording, any proposal would be required to demonstrate through a 24 month marketing campaign or robust qualitative and quantitative assessment about the suitability of the commercial floorspace. This onerous restriction could hinder the developability of particular sites, which are better suited for development of alternative uses, in order to meet the wider objectives of the Plan. We therefore suggest that recognition is made within the policy or the supporting justification which mirrors the adopted position for site allocations, suggesting that the marketing requirements are not relevant in such instances where the loss of employment is proposed in the areas earmarked for redevelopment. The policy should not compromise the ability to satisfy the principal objectives of the Local Plan which is to stimulate growth and development in the key Activity Areas. This proposed amendment would ensure that this policy is positively prepared in order to deliver the land use requirements within the Borough and local area, whilst also seeking to make the policy and plan justified through its focus on office development further north in the Isle of Dogs, recognising that this area is no longer suitable or in demand for office occupiers.	No	Policy D.EMP3 – Supporting Text or Additional Policy Point Insert <The Council recognises that a specific approach is required to help deliver site allocations and their component strategic infrastructure uses. The Council recognises that the nature of uses proposed on site allocations requires a change from the existing uses. As such, Part (2) of Policy D.EMP3 does not apply to site allocations.>	The council's evidence highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. Site allocations are capable of meeting some of this need and some site allocations should be employment-led. As such, relaxation of the stated evidence requirement on site allocations is considered inappropriate. Please note that paragraph 5.30 also makes reference to site allocations.

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1142365		Newport Holdings Ltd	LP227	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Positi vely prepa red; Justifi ed; Effect ive; Consi stent with natio nal policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Draft Policy D.EMP3: Loss of Employment Space Part 1 of this policy reflects our comments set out above on draft Policy S.EMP1 and provides the necessary protection for existing employment floorspace in POLs. It reflects the current adopted policy and that set out under the Preferred Approach regulation 18 consultation in November 2016, as well as the Mayor's strategic approach. OFFICER TO REFER TO COMMENTS MADE IN RELATION TO POLICY EMP1 In order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.	Yes		Comments noted.

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719346	John Turner	Ballymore Group	LP273	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No				<p>Policy D. EMP3 – Loss of Employment Space We support the Councils desire to protect floorspace on non-designated employment sites however as stated in our previous representations in January 2017 there must be recognition of the importance of other uses which can be delivered within these areas. In order to achieve sustainable densities appropriate to the local areas the Council should consider the protecting of the number of full time employees instead of floorspace. The National Planning Policy Framework 2012 (NPPF) paragraph 165 states that local authorities should set out policies to deliver jobs within an area. The Council set out within the draft Local Plan that approximately 130,000 new jobs are required. It is therefore imperative that the Council seeks to maximise the delivery of jobs within the Borough. Innovative policy measures such as the use of higher employment densities should therefore be explored. Potential reductions in business floorspace could allow space for other uses such as community and educational establishments to be delivered. The employment density test would allow the Council to consider the planning gain of reducing the business space without being burdened with loss of job opportunities on site. There is an underlying approach supported within policy documents for Greater London to deliver increased but sustainable densities. This has led to high density developments within the London Boroughs delivering much needed housing. We consider that to maximise the delivery of jobs within the borough and achieve the ambitious targets set by the London Plan and goals of the NPPF, the Council should seek to ensure that the existing levels of full time employees within the existing business spaces are retained and a more flexible approach should be considered regarding the protection of floorspace. Finally the current wording of part 2 of the policy is overly restrictive to encourage development to come forward. One of these requirements is for active marketing over a period of 24 months. This period of time is seen as excessive and should be reduce to 6 – 12 months.</p>	Yes		<p>The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate.</p>

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1142424	OCM Luxembourg Buckle Street Apart-	OCM Luxembourg Buckle Street Apart-Hotel Sarl	LP285	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employem t space	No	Justified; Effective; Consistent with national policy			<p>21. At Part 2 of Policy D.EMP3 it states that there should not be a loss of viable employment floorspace as a result of development. So as to be justified, and to accord with Paragraph 154 of the NPPF the term 'viable' should be clarified further to make the policy effective. 22. The continued employment use of floorspace or land could be constrained by commercial, financial or physical aspects of viability, and this should be acknowledged in either the policy or the sub-text. Paragraph 5.29 provides advice that applications should be supported by a marketing exercise which would provide information to the site's commercial viability for employment use, but no consideration is given to physical or financial viability. Similar level of advice should be provided to applicants in respect of these other matters. 23. Part 2 (a) of Policy D.EMP3 requires that at least 24 months of marketing is provided to support an application for a site's redevelopment. This is considered to be excessive, and not reflective of the dynamic property market in London, particularly in the City Fringe and CAZ areas. It is not considered that this policy will be effective at bringing forward development in accordance with the targets set out at the start of the Chapter (Paragraph 5.4). Regardless of the caveats provided at paragraph 5.30 to enable applicants to avoid a marketing exercise, a 24 month period of marketing is excessive and likely counterproductive. 24. It is notable that the neighbouring City of London does not suggest a set period of time for marketing to be undertaken, instead, its policies focus more upon the quality and robustness of the evidence provided including marketing as just one of a number of means of evaluating whether a building/site remains viable for employment uses. The policy leaves the length of marketing open for agreement with the local authority on a site by site basis. It is considered that this approach could be a more appropriate method of protecting employment space in the Borough, which operates within broadly the same commercial property context as the City. 25. Part 2 (a) also refers to "indicative figures" which is explained further in Paragraph 5.29 where this "indicative guidance" is "regularly updated". This information should be clearly set out in order to understand whether this policy is sufficiently justified. 26. Part 2 (b) includes a requirement for applicants to demonstrate that "the benefits of alternative use would outweigh the benefits of employment use". In order to make the Policy effective, there should be clarity provided within the sub-text to explain what this means. The plan should be amended to make it clear precisely what type of benefits the Council will seek to balance. It is assumed that public benefits, economic benefits, heritage benefits and environmental would all be of</p>			<p>Comments noted. Regarding the need to include 'viability' within policy D.EMP3.2, we consider that all local plan policies are viability tested and are also 'subject to viability'; therefore it is not considered necessary to add in this reference. Note that we have viability tested a number of the site allocations and no significant adverse impact on viability has been identified. In terms of the length of marketing period, the council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.</p> <p>In terms of alternative uses (policy D.EMP3.1b), the supporting text to policy D.EMP3 will be amended to provide greater clarity regarding alternative uses (e.g. within town centres) to maintain active uses and frontages. Please see below proposed modifications to paragraph 5.30:</p> <p>It is recognised that, in some cases, requiring 24 months marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that reprovided employment space as part of redevelopment would not be viable. It should also be demonstrated that the</p>

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									importance, and this should be clarified, and any necessary prioritisation within these categories also provided. 27. Within the CAZ equal weight is given to employment uses, other strategic CAZ uses and residential uses, and this should be recognised in the sub-text to policy D.EMP3. This amendment is required in order to make the application of the policy clear and effective.			proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses. The report should also demonstrate that the benefits of an alternative use would outweigh the benefits of the employment use to meet other local plan objectives, such as the need for complimentary town centres uses or to maintain active frontages within town centres.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP336	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Justified			The current wording of the policy sets out a list of criteria that needs to be met in order to satisfy the Council that the loss of employment floorspace in LEL's is acceptable. One of these requirements is active marketing over a period of 24 months. This period of time is seen as excessive and should be reduce to 6 – 12 months. The current wording of the policy will inhibit development, which could otherwise be converted into housing or an alternative active use. The policy should also have consideration and support for the conversion of listed office buildings located within LELs back to their original land use without the need for excessive marketing. The failure to adopt this policy approach could result in the continued decline or loss of listed buildings within the Borough.			The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where is it considered that this requirement is too onerous on certain sites, particularly redevelopment sites. As such, relaxation of the stated evidence requirement including for listed buildings is considered inappropriate. Paragraph 5.30 provides some flexibility where is it considered that this requirement is too onerous on certain sites, particularly redevelopment sites.
1142493		Berkeley Group	LP409	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No				D.EMP3: Loss of employment space Policy or relevant site allocations should confirm that 'Gasholders' are sui generis floorspace and not covered by this policy Soundness test: Revise to make deliverable and therefore effective	Yes		Comment noted. It is not considered, given the nature of gasholders, that they would meet the definition of Sui Generis industrial functions articulated in paragraph 5.6. As such, there would be no requirement to re-provide the gasholder floorspace as employment space.

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1142590		British Airways plc	LP475	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Effective; Consistent with national policy			<p>Policy D.EMP3 currently reads: 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. Part 2 of Policy D.EMP3 resists the loss of existing employment floorspace in locations outside of those allocated for employment uses, unless they can meet specific criteria detailed in parts a and b. The approach to protecting allocated employment sites should be consistent with the NPPF (paragraph 22) which states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." As such, Policy D.EMP3's current stance is likely to restrict necessary redevelopment whilst disregarding the purpose of including designated employment areas within the Local Plan. Furthermore, whilst we acknowledge the importance of protecting viable employment floorspace in the borough, we suggest that the insistence of a minimum 24 month evidence period proving active marketing has taken place as stated in part b is excessive and should be reduced to 6 months. The current wording of the policy will inhibit development, resulting in potential vacant buildings which could otherwise be converted into housing or an alternative active use. Considering the above, we therefore suggest Policy D.EMP3 (Loss of employment space) is amended to the following: 1. Development resulting in the net loss of existing</p>			<p>The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.</p>

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									<p>employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least DELETE <24 months> INSERT < 6 months> at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. INSERT <4. Development leading to the loss of employment floorspace will not be considered to be harmful where that same quantum of floorspace has already been provided as part of a net intensification across the wider employment site.></p>			

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624580	Jason Larkin	Canary Wharf Group Plc	LP526	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Justified			Part 1 of the policy refers to the loss of existing employment floorspace or “potential sites” within POLs. Reference to “potential sites” is incorrect and contradicts draft policy S.EMP1 which does allow sites within Secondary POLs to come forward for non-employment uses. The reference to “potential sites” should therefore be deleted. The approach to protecting allocated employment sites should be consistent with the NPPF, in particular para. 22 which states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.” This was acknowledged specifically in relation to POL in the Council’s Core Strategy & NPPF Consistency Review which stated: “The Council will consider planning applications for vacant employment sites in Preferred Office Locations on an individual basis, taking into account the suite of policies (including Core Strategy SP06.2, NPPF paragraphs 18-22, Managing Development Document policy DM16), in order to effectively assess the prospect of an employment use coming forward on that site.” In order to be consistent with national policy, the same flexibility should be introduced into draft policy D.EMP3. The justification for Part 2 set out in Paragraph 5.29 should acknowledge the important supporting role the employment space outside of the POLs, Strategic Industrial Locations (“SIL”) and Local Employment Locations (“LILs”) play in accommodating employment which serves the function of the strategic employment zones. Employment space surrounding the strategic designations and on key artillery routes into and through the borough play an important role in the overall economic function of the strategic designations. Policy D.EMP3 or the supporting text should also acknowledge the value of various types of employment space to clarify this is not just limited to office space.			Comments noted. Regarding the reference to 'potential sites', this has now been removed from Policy 5.30 for clarification purposes. Regarding the flexibility of policy D.EMP3, it is considered that the policy is already sufficiently flexible, particularly regarding the marketing period. Regarding the supporting text for policy D.EMP3, it is not considered necessary to acknowledge the value of different types of employment space outside the POL, SIL and LIL as this is adequately addressed elsewhere in the plan (e.g. policy S.EMP1). In terms of acknowledging the value of various types of employment space to clarify this is not just limited to office space, it is considered that the plan already adequately highlights the need for a range of employment types and spaces. Proposed modifications to policy D.EMP3 are set out below: 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the net loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they:

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1142691		Alliance Property Asia	LP610	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employmen t space	No				POLICY D.EMP3: LOSS OF EMPLOYMENT SPACE The current wording of the policy sets out a list of criteria that needs to be met in order to satisfy the Council that the loss of employment floorspace in LEL's is acceptable. One of these requirements is active marketing over a period of 24 months. This period of time is seen as excessive and should be reduce to 6 – 12 months. The current wording of the policy will inhibit development, which could otherwise be converted into housing or an alternative active use. The policy should also have consideration and support for the conversion of listed office buildings located within LELs back to their original land use without the need for excessive marketing. The failure to adopt this policy approach could result in the continued decline or loss of listed buildings within the Borough. Note: No soundness test undertaken.	Yes		Comments noted. Regarding the marketing period, the council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate.
1054252	Londone wcastle	Londone wcastle	LP626	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employmen t space	No	Effect ive			The current wording of the policy sets out a list of criteria that needs to be met in order to satisfy the Council that the loss of employment floorspace in LEL's is acceptable. One of these requirements is active marketing over a period of 24 months. This period of time is seen as excessive and should be reduce to 6 – 12 months. The current wording of the policy will inhibit development, which could otherwise be converted into housing or an alternative active use. The policy should also have consideration and support for the conversion of listed office buildings located within LELs back to their original land use without the need for excessive marketing. The failure to adopt this policy approach could result in the continued decline or loss of listed buildings within the Borough. As a result, we do not consider the draft plan to be effective.			The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where is it considered that this requirement is too onerous on certain sites, particularly redevelopment sites.

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1142716	Lyca Group		LP687	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	N/A		<p>Policy D.EMP3 currently reads: 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. Part 2 of Policy D.EMP3 resists the loss of existing employment floorspace in locations outside of those allocated for employment uses, unless they can meet specific criteria detailed in parts a and b. The approach to protecting allocated employment sites should be consistent with the NPPF (paragraph 22) which states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support</p>				<p>Comments noted. The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate. Paragraph 5.30 provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.</p>

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								<p>sustainable local communities.” As such, Policy D.EMP3’s current stance is likely to restrict necessary redevelopment whilst disregarding the purpose of including designated employment areas within the Local Plan. Furthermore, whilst we acknowledge the importance of protecting viable employment floorspace in the Borough, we suggest that the insistence of a minimum 24 month evidence period proving active marketing has taken place as stated in part b is excessive and should be reduced to 6 months. The current wording of the policy could be prohibitive to development, resulting in potential vacant buildings which could otherwise be brought forward into active use through mixed use development. Considering the above, we therefore suggest Policy D.EMP3 (Loss of employment space) is amended to the following: As such, Policy D.EMP3’s current stance is likely to restrict necessary redevelopment whilst disregarding the purpose of including designated employment areas within the Local Plan. Furthermore, whilst we acknowledge the importance of protecting viable employment floorspace in the Borough, we suggest that the insistence of a minimum 24 month evidence period proving active marketing has taken place as stated in part b is excessive and should be reduced to 6 months. The current wording of the policy could be prohibitive to development, resulting in potential vacant buildings which could otherwise be brought forward into active use through mixed use development. Considering the above, we therefore suggest Policy D.EMP3 (Loss of employment space) is amended to the following:</p> <ol style="list-style-type: none"> 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable 				

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								employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least DELETE <24 months> insert < 6 months >at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. INSERT <4. Development leading to the loss of employment floorspace will not be considered to be harmful where that same quantum of floorspace has already been provided as part of a net intensification across the wider employment site.>				
1053510	Zeloof LLP and Truman Estates Limit		LP711	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No				4. Draft Policy D.EMP3: Loss of employment space 4.1. The draft policy is concerned with employment floorspace which, with reference to supporting text (para. 5.6), is relevant only to 'B' use classes only. For the purposes of the protection of employment floorspace within designated town centres, flexibility should be incorporated within the policy to allow for a change of use from office to retail uses whereby a similar employment density can be maintained. Retail uses play a significant role as major employers within the borough's designated town centres. This is particularly significant at ground floor level where retail use is important to the vitality of designated town centres. The policy should therefore incorporate a level of flexibility to ensure the vitality of the borough's town centres is protected and promoted. Note: no soundness test was undertaken.	Yes		Comment noted. It is considered that the current approach is appropriate, as part b of policy D.EMP3.2 gives some flexibility which could be applied where there alternative use is clearly beneficial to meeting other objectives.

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1143308	Raycliff Whitechapel	Memery Crystal	LP797	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Effective			Draft Policy D.EMP3: Loss of employment space This draft policy resists the loss of viable employment floorspace, including in LEL's, except under clause 2, where there is evidence of at least 24 months active marketing over a continuous period, or it is demonstrated that the site is genuinely unsuited to continued employment use due to its condition; reasonable options for restoring the site for B classes are unviable; and that the benefit of the alternative use outweigh the benefits of an employment use. This policy appears to acknowledge that discretion is sometimes needed, and that 24 months marketing evidence can be counterproductive (referencing the condition of a property where attempting to let it would be unrealistic). The requirement for a prolonged period of marketing is also inappropriate in the context of sites housed in important listed buildings, where this could have a negative impact on the maintenance of listed fabric. In such cases, it is agreed that discretion is needed to allow for the most appropriate use or uses to be accommodated, that will rejuvenate and secure their long-term future. Here greater emphasis on other benefits is appropriate, for example, uses that best fit the historic plan form, help to care for and enhance list fabric; or permit greater public access to sites of historic interest. Other benefits could include maintaining a site in single ownership. Further clarification would also be helpful on the required evidence under part 2(b) and part 3, which requires the applicant to demonstrate that alternative employment uses would not be viable, and the loss of employment floorspace would not compromise the operation and viability of the wider LEL, particularly in the context of historic buildings.	Yes		Comments noted. Regarding the marketing period, the council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest, but with scope for this to be varied in discussion with the council. Furthermore, in line with the report's recommendations, flexibility has been built into the policy for situations where owners are considering redevelopment as opposed to re-letting their property. As such, relaxation of the stated evidence requirement is considered inappropriate.
1033272	James Stevens	Home Builders Federation Ltd	LP813	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	N/A			We note that the policy will not allow the net loss of existing employment floor-space within Preferred Office Locations, Local Industrial Locations and Strategic Industrial Locations (SIL). Unfortunately, without a SHLAA it is hard to judge whether this policy approach is consistent with maintaining housing delivery in the borough. We assume it is, but third parties ought to be able to check. We are aware that the Mayor of London through the new London Plan will wish to tighten control over the release of SIL land (see for example the London Housing Strategy, paragraph 3.24). It is unclear, however, what implications this may have for industrial land, including SIL sites, allowed for re-development for residential use under the existing				The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. Furthermore, the new draft London Plan has strengthened protection of industrial land and CAZ policies are consistent with the council's POL policies. As such, the council's approach is considered appropriate and justified.

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								London Plan. This had potential implications for Tower Hamlet's existing planning permissions (which in Tower Hamlets amount to 5,241 dwellings – page 11 of the Housing Delivery Strategy). The policy should make clear that the policy will not apply to existing employment space allocated for residential use under the current Tower Hamlets and London Plan, and employment sites that already benefit from a planning permission for conversion.				
1053283		Travis Perkins	LP874	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Positively prepared; Consistent with national policy			DRAFT TOWER HAMLETS LOCAL PLAN (REGULATION 19 CONSULTATION) REPRESENTATIONS SUBMITTED ON BEHALF OF TRAVIS PERKINS (PROPERTIES) LIMITED We are instructed by our client, Travis Perkins plc, to submit the enclosed representations to the emerging Tower Hamlets Draft Local Plan 2031. Representations can be made until 5pm on Monday 13th November 2017 and on the basis that this letter is submitted (via email) within those timescales we trust that our comments will be taken into account a) Context Travis Perkins (TP) own and operate builders' merchants across London. These builders' merchants provide an essential service to London's construction industry, supplying building materials to the trade and delivering direct to building sites, helping London build. TP builders' merchants fall within the sui generis classification of the Use Class Order. Employment generating sui generis uses are often overlooked when setting out policies to protect employment uses within emerging development plans and when allocating sites for mixed-use redevelopment which puts them at a distinct disadvantage and at risk of being lost. Quod submitted representations on behalf of TP to the Regulation 18 consultation version of the Tower Hamlets Local Plan in January 2017. In these representations, TP requested that sui generis uses were included as a protected employment use in the relevant employment policies and the glossary of the Local Plan. The Regulation 19 version of the Local Plan states at paragraph 5.6 that employment uses include the 'B' use classes (business, general industrial and storage and distribution) and sui generis industrial functions. This is welcomed by TP, however as this statement is within the supporting text and not in a policy or glossary, sui generis employment generating uses, such as builders' merchants therefore continue to be afforded little protection by the Local Plan. TP is the leaseholder of a site at Hollybush Road, Bethnal Green which is particularly relevant at the moment. A current planning application (ref. PA/16/02713/A1) submitted in September 2016 by the landlord is under	Yes		The glossary will be updated to define employment uses as follows: Employment uses: Offices, industrial and storage and distribution facilities which fall under B1,B2 and B8 of the use classes order, as well as other sui generis uses with industrial functions.

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									<p>consideration which seeks planning permission to redevelop the site for 60 residential units over two blocks; Page 2 with Class B1 commercial floorspace. TP is a leaseholder on this site, with 7 years remaining on their lease. There are no other suitable sites in the area to accommodate this branch of TP and if this redevelopment goes ahead, the essential service provide by this successful builders' merchant will be lost. b) Policy Context One of the 12 key principles of the NPPF is that local plans support sustainable economic development to deliver business and industrial units (as well as housing and infrastructure). At paragraph 19, the NPPF states: "Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system" At paragraph 20 the NPPF seeks to ensure that Local Authorities proactively support the development needs of business and at Paragraph 21 advises that Local Plans should support existing business sectors and take into account whether they are expanding or contracting. The London Plan FALP (March 2015) is consistent with the NPPF and seeks to protect London's industrial land, but also allows for the release of sites if it will contribute to wider local planning objectives. Policy 4.4 places emphasis on the need to manage the release of industrial land stating: "The Mayor will work with boroughs and other partners to: a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal" (our emphasis) The London Plan discusses the need for industrial sites to remain in London in order to provide necessary services to local businesses with an evidence based approach promoted to reconcile demand and supply of industrial land and related uses. It is significant that the Mayor's Land for Industry and Transport SPG (September 2012) further emphasises the need to protect existing industrial sites but promotes a mixed-use approach to redevelopment with the use of careful siting, design and access arrangements to prevent any conflict of future occupiers. Page 3 c) TP Hollybush Place TP is a long term leaseholder of the builders' merchant in Bethnal Green at 5 Hollybush Place, E2 9QX. TP has 7 years remaining on the lease and have no intention of</p>			

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									<p>vacating the site before this time. A planning application (ref. PA/16/02713/A1) was submitted by the landowner in September 2016, seeking to redevelop the site for 60 residential units and Class B1 space. The proposed development is for a mixed use commercial/residential scheme, however the proposed commercial units are too small and could not accommodate a builders' merchant. As such, the builders' merchant is being pressured to vacate the site if planning permission is granted. The Local Plan does not provide specific protection for builders' merchants. If this planning application is granted consent, TP will lose their business with no suitable relocation sites in the catchment area. d) Mixed Use Builders' Merchant Sites Employment uses such as builders' merchants can function successfully alongside other uses such as residential or offices on mixed-use sites. Travis Perkins' builders' merchant branches have already been successfully incorporated into mixed-use schemes in London, including at Battersea Park Road in Wandsworth and St Pancras Way in Camden. At Battersea Park Road in Wandsworth, a 'One Stop' Travis Perkins builders' merchant operates on the ground floor of a five storey building with flats above. This branch also provides an active frontage at street level providing the same function as a standard shopfront. The TP branch on St. Pancras Way is a fully operational TP builders' merchant with an external yard area which successfully operates alongside (below) a 560 bed UNITE student accommodation development. Both of these sites demonstrate how an existing TP branch can form part of a residential-led redevelopment proposal, a concept which can also work with office led developments. e) The Test of Soundness i. Not consistent with National Policy In order to pass the test of soundness, Local Plan policies should be consistent with the NPPF. One of the 12 key principles of the NPPF is that local plans support sustainable economic development and paragraph 19 seeks to ensure that the planning system does everything it can to support sustainable economic growth. Paragraph 20 seeks to ensure that Local Authorities proactively plan to meet the development needs of business and at Paragraph 21 advises that Local Plans should: Page 4 "support existing business sectors, taking account of whether they are expanding or contracting" At present the Local Plan does not afford protection to the builders' merchant at Hollybush Place or other sui generis employment generating uses throughout the borough. This is demonstrated in the current landlord planning application to redevelop the Site, which, if approved, will result in the loss of the builders' merchant and closure of a successful business and associated jobs. In order to ensure that sui generis</p>			

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									industrial uses are protected in the future, a definition of Employment Uses or Employment Floorspace (as it is referred to in the employment policies) should be included in the Local Plan Glossary. This definition should state that sui generis uses, such as builders' merchants will ensure that these kinds of businesses are protected in the future. ii. Not Effective Policy EMP1 outlines the intention for the Council to create 125,000 jobs over the period to 2031. The Tower Hamlets Employment Land Review (Draft - November 2016), states at paragraph 4.44 that the demand for industrial space is strong and is from a mix of companies with suppliers and trade counters specifically mentioned as being in demand. At Paragraph 4.48 the draft ELR states that agents have outlined that there is only a 3% vacancy rate for industrial premises. This equates to less than one year's supply of industrial type premises. At Paragraph 4.49, Tower Hamlet's industrial space offer is described as "particularly low" when compared with other Borough's. Although employment policies are robust and seek 24 months marketing before an employment site can be redeveloped for other uses, sui generis builders' merchants are not in a traditional employment or economic use. The NPPF Glossary defines Economic Development as those uses which fall into the B Use Classes as well as community uses and main town centre uses. The planning application which seeks to redevelop the TP branch on Hollybush Place is an example of weaker Local Plan policies can result in the loss of a non-traditional employment generating use, which is not afforded protection because it is not within the B Classes. The Draft Local Plan is therefore not effective until the Glossary clearly defines "employment floorspace" or 'employment uses' as those in the B Use Classes and other similar sui generis uses, such as builders' merchants. Stating this in the supporting text does not go far enough.			
1053881	Sally Styles	C M A Planning Ltd	LP89	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Justified			D.EMP3 – Loss of Employment Space Comment: As per previous comments made in respect of the Regulations 18 consultation in respect of Policy EMP4 Part 2i (as was), the previous objections are maintained. As previously stated the 24 month marketing period is too long and should be reduced to 12 months. This length of time potentially results in premises being left vacant for long periods of time which is an inefficient use of land and buildings. Suggested Amendment: Replace 24 months with 12 months	Yes		The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that a more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest. Furthermore, in line with the report's recommendations, paragraph 5.30 of the Local Plan provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP951	PART 3: POLICIES, 5.27 Paragraph Policy D.EMP3: Loss of employment space	No	Effective; Consistent with national policy			Policy D.EMP3 (Loss of employment space) Policy D.EMP3 currently reads: 1. Development resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs), except where they: a. provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. Part 2 of Policy D.EMP3 resists the loss of existing employment floorspace in locations outside of those allocated for employment uses, unless they can meet specific criteria detailed in parts a and b. The approach to protecting allocated employment sites should be consistent with the NPPF (paragraph 22) which states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." As such, Policy D.EMP3's current stance is likely to restrict necessary redevelopment whilst disregarding the purpose of including designated employment areas within the Local Plan. Furthermore, whilst we acknowledge the importance of protecting viable employment floorspace in the Borough, we suggest that the insistence of a minimum 24 month evidence period proving active marketing has taken place as stated in part b is excessive and should be reduced to 6 months. The current wording of the policy could be prohibitive to development, resulting in potential vacant buildings which could otherwise be brought forward into active use through mixed use development. Considering the above, we therefore suggest Policy D.EMP3 (Loss of employment space) is amended to the following: 1. Development			The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that a more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest. Furthermore, in line with the report's recommendations, paragraph 5.30 of the Local Plan provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.

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								<p>resulting in the net loss of existing employment floorspace or potential sites within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported. 2. Development should not result in the loss of viable employment floorspace outside of the designated employment areas cited in part 1 above or Local Employment Locations (LELs),except where they: a. provide evidence of active marketing over a continuous period of at least DELETE <24 months> INSERT <6 months> at a reasonable market rent which accords with indicative figures; or b. provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use. 3. Proposals involving the loss or reduction of employment floorspace within LELs must also demonstrate that alternative employment uses would not be viable and the loss of employment floorspace would not compromise the operation and viability of the wider LEL. INSERT <4. Development leading to the loss of employment floorspace will not be considered to be harmful where that same quantum of floorspace has already been provided as part of a net intensification across the wider employment site.></p>			

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1033229	Paul Burley	Montagu Evans LLP	LP43	PART 3: POLICIES, 5.31 Paragraph	No	Effective			<p>Representations on Behalf of Barts Health NHS Trust (ID: 635854) Redevelopment within the Borough's Employment Areas In respect of Whitechapel Part 4 of the proposed policy says that "The redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided on-site and where it...c. provides a range of high-quality flexible workspaces designed to meet the needs of the growing biotech cluster, research and development space, flexible workshop space and units to meet the needs of other small-to-medium enterprises and creative businesses within the Whitechapel LEL...". That list, which is inclusive, suggests that the flexible workspace should meet the needs of all of those potential uses. That is not possible or desirable – floorspace for biotech companies will be of a very different nature and specification to that needed by creative industries. For example, life sciences and biotech companies may require laboratories and large-floorplate offices for desk-based work and collaborative writing whereas creative industries might require smaller workshop space, perhaps even with showroom-type facilities. Furthermore, some occupiers within those categories will want a specification that commands rental levels outside of the affordability envelope of other occupiers within those categories. Instead, the policy should say that floorspace should be designed wherever possible to be flexible or adaptable over time and that it should meet the needs of one or more of the types of businesses that the Council would like to see locate in the Whitechapel area.</p>	Yes		Comments noted. Regarding flexible workspace, it is considered that the plan already offers sufficient flexibility and does not specify the needs of all user types cited need to be considered on each individual unit or site, supported by paragraph 5.35.

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1033229	Paul Burley	Montagu Evans LLP	LP44	PART 3: POLICIES, 5.31 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Redevelopment within the Borough's Employment Areas In respect of Whitechapel Part 4 of the proposed policy says that "The redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided on-site and where it...c. provides a range of high-quality flexible workspaces designed to meet the needs of the growing biotech cluster, research and development space, flexible workshop space and units to meet the needs of other small-to-medium enterprises and creative businesses within the Whitechapel LEL...". That list, which is inclusive, suggests that the flexible workspace should meet the needs of all of those potential uses. That is not possible or desirable – floorspace for biotech companies will be of a very different nature and specification to that needed by creative industries. For example, life sciences and biotech companies may require laboratories and large-floorplate offices for desk-based work and collaborative writing whereas creative industries might require smaller workshop space, perhaps even with showroom-type facilities. Furthermore, some occupiers within those categories will want a specification that commands rental levels outside of the affordability envelope of other occupiers within those categories. Instead, the policy should say that floorspace should be designed wherever possible to be flexible or adaptable over time and that it should meet the needs of one or more of the types of businesses that the Council would like to see locate in the Whitechapel area.	Yes		Comments noted. Regarding flexible workspace, it is considered that the plan already offers sufficient flexibility and does not specify the needs of all user types cited need to be considered on each individual unit or site, supported by paragraph 5.35.
1142035		Hermes Property Unit Trust	LP168	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	Yes			Policy D.EMP4: Redevelopment within designated employment Although we object to the allocation of Thomas Road as a Local Industrial Location (LILs), we support the general principle of allowing the redevelopment of LILs to include non-employment uses, although we consider that qualitative improvements and increased job creation should be taken into account. Moreover, the policy should allow for demonstrable economic benefits We support the general thrust of Part 6 of the policy as a pragmatic approach to the re-provision or relocation of existing businesses, provided it is viable to do so.		Yes		Support noted. It is considered that the qualitative improvement of LILs and their impact on job creation is considered elsewhere in the plan, such as policy S.EMP1.

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635451	National Grid Property Holdings		LP193	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelop ment within designated employmen t area	No	Justifi ed; Effect ive			Part 4 of this policy is neither justified nor effective as only allowing the redevelopment of Local Employment Locations (LELs) to include non-employment uses where the existing level of employment floorspace is re-provided on-site does not take into account the quality of existing provision. It is important to recognise that with good planning and design it is possible to provide a higher quality employment space that may have less floorspace but is well used. This would be preferential to re-providing employment floorspace of the same quality that is then not fully occupied. More flexibility is therefore required from this policy to ensure the overall viability of schemes to redevelop parts if LELs are not undermined by a policy which is currently overly prescriptive. Specifically, it should be noted that this should not apply to gasholder site within Site Allocation area 1.3, which technically falls within a LEL, but does not currently include any employment floorspace. Part 4f requires a range of units including industrial floorspace, small-to-medium enterprise space and studios to meet the needs of creative industries within the Cambridge Heath LEL. If this policy is not applied flexibly then these requirements will severely limit the opportunity to meet other Plan policies such as housing delivery. It should be clarified within this policy that the gasholder site (in Site Allocation 1.3) does not currently include any employment space. In addition, the requirement to provide a range of employment units should be applied flexibly depending on the position in the context of viability on a specific site and should not prejudice housing delivery in Site Allocation areas. NOTE THAT THIS ALSO RELATES TO SITE ALLOCATIONS - TM TO VIEW	Yes		The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. It is not considered, given the nature of gasholders, that they would meet the definition of Sui Generis industrial functions articulated in paragraph 5.6. As such, there would be no requirement to re-provided the gasholder floorspace as employment space. It is also considered that the plan already offers sufficient flexibility, and that uses other than employment can be supported within LELs.
635773	Al Mubarak ia Ltd		LP207	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelop ment within designated employmen t area	No				Policy D.EMP4 (Redevelopment within designated Employment Areas) Policy D.EMP4 sets out the parameters for proposals which result in the loss of employment floorspace, referring to Preferred Office Locations (POL), the Central Activities Zone (CAZ), Local Employment Locations (LELs) and Local Industrial Locations (LILs). The Tobacco Dock site does not fall within any of these designations and therefore is not considered to be subject to any of the policy restrictions within Policy D.EMP4. However, it would be considered helpful if this policy clearly set out what LBTH consider as an 'employment area' and whether this designation extends to sites within the THAA.	Yes		This information is already set out in policy S.EMP.1 along with the Policies Map. Please note that further amendments have been made to ensure that Policies S.EMP1 and D.EMP4 are fully aligned and consistent.

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1142365		Newport Holdings Ltd	LP229	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Positively prepared; Justified; Effective; Consistent with national policy			On behalf of our client, Newport Holdings Ltd, we set out below representations to the Regulation 19 consultation on the Tower Hamlets Local Plan 2031, published for comment until 13 November 2017. We understand this is the final round of consultation prior to submission for Examination which raises a number of concerns as the approach to a number of policies has fundamentally changed since the previous round of consultation in 2016, without adequate explanation for the proposed approach. We consider that the issues and amendments set out in these representations should be addressed prior to submission for Examination (with a further round of consultation if necessary) and we would be grateful if the comments set out in this letter could be fully considered by the Council and the appointed Inspector prior to the Plan being finalised for adoption. Newport Holdings Ltd is a landowner in the Aldgate area and has committed to making a significant investment in the Borough with a range of associated benefits. We welcome the opportunity to comment on the draft Plan on behalf of Newport Holdings Ltd and trust that the representations set out below are helpful to the Council and the Inspector in ensuring the Plan is positively prepared, justified, effective and consistent with national policy. Representations The representations set out below are based on the chapters and associated policies of the draft Plan for ease of reference. Draft Policy D.EMP4: Redevelopment within Designated Employment Area Draft Policy D.EMP4 point 2 states that redevelopment within the SPOL "...must be employment-led and deliver the maximum viable level of office floorspace, or other non-residential strategic functions within the Central Activities Zone (CAZ). Where residential uses are proposed these should not exceed the proportion set out in policy S.EMP1". Our comments on this draft Policy directly reflect those set out above on draft Policy S.EMP1. We reiterate the changes required to ensure that this policy reflects national policy and the London Plan, supporting the delivery of mixed-use development in the SPOL which forms part of the CAZ and the Opportunity Area, re-providing office floorspace currently on site (and thereby providing a supply of modern high quality space) but without enforcing an unreasonable and unjustified restriction on the percentage of housing within this redevelopment which will unnecessarily constrain housing supply. We also reiterate that on the basis of LBTH's approach to the SPOL (where office-led redevelopment must be delivered) our client's site should be removed from this designation and placed in the CAZ only, together with similar developments on the eastern side of Leman Street. The mixed-use redevelopment of the site, re-providing existing office	Yes		<p>Comments noted. Regarding the proposed employment floorspace thresholds, it is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to</p>

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								<p>space and providing a split of approximately 75% residential and 25% office, has been strongly supported by the Mayor of London and LBTH's Officers, and clearly the draft Policy as now proposed would conflict with this support. Subject to the application being positively determined, the uses on site would not correlate with the designation of SPOL and the site is therefore considered suitable for inclusion in the CAZ (zone C) only. We request that the Aldgate SPOL boundary is reviewed on this basis. We have reviewed the requirements for sites within CAZ (zone C) under draft Policy D.EMP4 part 3 on the basis of this requested re-designation and wider redevelopment opportunities within the Borough. The draft policy states that within this zone redevelopment "...should be mixed-use to include office or other nonresidential floorspace that supports the strategic function of the CAZ. The proportion of residential floorspace should not exceed 50% of the total floorspace within the development proposal". The first part of this draft Policy is supported, providing mixed-use developments in this part of the Borough to support its strategic function which aligns with the policies of the London Plan. The second part of the draft Policy, however, is not considered justified or sound and places an unreasonable restriction on future development and the critical supply of housing in Tower Hamlets. It also directly conflicts with Chapter 4 of the draft Local Plan, which sets out a Borough-wide need for 58,965 new homes by 2031, with the City Fringe opportunity area, within which the CAZ zone C falls, playing a key part in achieving these figures with a minimum delivery of 9,330 new homes with specific reference to delivery in Aldgate. We also note that draft Policy S.EMP1 states that equal weight will be given to proposals for residential and employment or other strategic CAZ functions in CAZ zone C. This suggests that these uses will be considered equally beneficial to the CAZ and both will be supported. However, draft Policy D.EMP4 then limits this approach, setting out a maximum of 50% of the total floorspace as residential. This approach will unnecessarily and unjustifiably constrain the quantum of residential delivery and does not take into account site-specific characteristics and the need to optimise a site's potential, making the best and most efficient use of brownfield sites. For instance, our client's site is capable of being redeveloped to re-provide the existing office floorspace on site and, through increased height in this identified 'Tall Buildings Zone', provide 75% of the new floorspace as residential. This ensures the delivery of much improved high quality office space to meet modern needs, with no net loss in the CAZ/SPOL, but also contributes to the critical supply of housing in the Borough. This is reflected in</p>			<p>accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace. 2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14:</p> <p>The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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									<p>other recently-developed sites in the identified CAZ (zone C) such as Goodman’s Fields – a highly successful mixed-use redevelopment which, based on the current draft policy approach, would not have been supported. We therefore consider that draft Policy D.EMP4 and associated draft Policy S.EMP1 have not been positively prepared, are not justified, are not effective in achieving the aims of the Plan and are not consistent with regional or national policy. The following alterations are requested: 1 Removal of the restriction of 25% residential only in the SPOL (under S.EMP1 and associated link within part 2 of Policy D.EMP4) 2 Removal of our client’s site from the SPOL area based on the current proposals which have been strongly supported by LBTH and the Mayor 3 Alteration to part 4 of policy D.EMP4 to simply state that within the CAZ (zone C) redevelopment “...should be mixed-use to include office or other non-residential floorspace that supports the strategic function of the CAZ”. No specific constraint should be placed on the delivery of residential as a proportion of total floorspace on site. These amendments would ensure consistency with Chapter 4 (housing delivery) and Chapter 3 (draft Policy D.DH6) which supports tall buildings in the identified Aldgate zone the Local Plan. They would also provide consistency with national policy and London Plan policy. Summary In summary our client is generally supportive of the Local Plan with reference to housing supply and the tall buildings zone, but considers there are fundamental issues with the draft policies set out under Chapter 5, particularly S.EMP1 and D.EMP4. It is not considered that these draft policies are positively prepared, justified, effective and/or consistent with regional and national policy. The key issue of concern is the constraint placed on the quantum of housing delivered as part of mixed-use redevelopment in the SPOL and the CAZ (zone C). We consider that the restrictions to residential as ‘25% of the site area’ only within the SPOL and a maximum of 50% of total floorspace within a development in the CAZ (zone C) should be deleted and the previously drafted approach reinstated i.e. within the SPOL the redevelopment of an existing employment site should re-provide the existing office floorspace as part of the proposed development, and within the CAZ equal weight should be given to office, residential and other strategic CAZ functions, as set out under draft Policy S.EMP1. We also consider that, based on our client’s live planning application for residential-led redevelopment within the tall buildings zone, with strong support from the Mayor and LBTH for the delivery of 25% office (re-provision of existing) and 75% residential, their site should be removed from the SPOL and placed in the CAZ (zone C), subject to the above comments on draft Policy D.EMP4 part 3.</p>			

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								In order for the Plan to be found sound, the amendments set out above should be addressed and this position resolved. At present the Plan is not positively prepared, there is a clear absence of justification for the proposed approach, and there are conflicts between its chapters as well as with strategic policy within the London Plan. We suggest that these amendments are made prior to submission for Examination as further amendments at a later stage could delay the progression and final adoption of this document.			
635854	Barts Health NHS Trust		LP234	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No			Redevelopment within the Borough's Employment Areas In respect of Whitechapel Part 4 of the proposed policy says that "The redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided on-site and where it...c. provides a range of high-quality flexible workspaces designed to meet the needs of the growing biotech cluster, research and development space, flexible workshop space and units to meet the needs of other small-to-medium enterprises and creative businesses within the Whitechapel LEL...". That list, which is inclusive, suggests that the flexible workspace should meet the needs of all of those potential uses. That is not possible or desirable – floorspace for biotech companies will be of a very different nature and specification to that needed by creative industries. For example, life sciences and biotech companies may require laboratories and large-floorplate offices for desk-based work and collaborative writing whereas creative industries might require smaller workshop space, perhaps even with showroom-type facilities. Furthermore, some occupiers within those categories will want a specification that commands rental levels outside of the affordability envelope of other occupiers within those categories. Instead, the policy should say that floorspace should be designed wherever possible to be flexible or adaptable over time and that it should meet the needs of one or more of the types of businesses that the Council would like to see locate in the Whitechapel area.	Yes		Comments noted. Regarding flexible workspace, it is considered that the plan already offers sufficient flexibility and does not specify the needs of all user types cited which should be considered on each individual unit or site. This is set out clearly in paragraph 5.35.

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1142398		David Abraham Partnership	LP255	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No			Policy D.EMP4 then states that redevelopment within the CAZ (Zone C) should include office or other non-residential floorspace and that the proportion of residential floorspace should not exceed 50%. Again it does not acknowledge that certain opportunity sites are already in residential use but are utilised inefficiently. Our client owns a low grade existing building in residential use within Zone C of the CAZ which presents a significant opportunity for redevelopment. The above policies, as drafted, disincentivise redevelopment of such sites and unnecessarily inhibit housing delivery. They are not in conformity with London Plan Policies 2.10, 2.11 and 2.12 which promote the intensification of uses and the protection of residential uses in the CAZ. The London Plan is clear that the CAZ has multiple functions, including as a place for people to live and that the provision of a range of homes in the CAZ helps support its strategic economic function. Draft Policies S.EMP1 and D.EMP4 currently undermine the balanced approach advocated by the London Plan. Change required: The references in Policy D.EMP4 and para. 5.14 to a suggested 50:50 apportionment between office and residential floorspace in individual new developments are arbitrary, unjustified and overly prescriptive. The suggested split does not acknowledge the existing land use mix at a site and will restrict rather than facilitate otherwise appropriate development. All references to a percentage split between component land uses in the area should be removed.	Yes		<p>It is considered that the council's approach to the Secondary POL and CAZ Zone C (CAZ tertiary area) is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) which has been prepared between regulation 18 and 19 stages. We recognise the need for mixed use development in CAZ Zone C and support new residential development. The 50% threshold has been included in order to protect the strategic function of the CAZ and to set out the council's position clearly on this issue. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below:</p> <p>Central Activities Zone (Zone tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of</p>

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												uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.
1142424	OCM Luxembourg Buckle Street Apart-	OCM Luxembourg Buckle Street Apart-Hotel Sarl	LP284	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Justified; Effective; Consistent with national policy			Policy S.EMP1 and D.EMP4 Evidence Base 1. Paragraphs 5.1 – 5.5 indicate that in order to meet future projections for jobs in office and industrial uses the broad planning policy target should be to protect existing floorspace and encourage new floorspace to be delivered either as standalone developments, or through mixed use developments. We broadly support this approach, though consider that the strategy for protecting existing B Use Class floorspace and sites should be more flexible than currently proposed by policies in Chapter 5, in order to be effective and sufficiently justified. 2. The higher GLA projections for jobs and floorspace are based on a 10 year trend covering 2005-15, typically representative of a full economic cycle and including a strong upward growth period at the national and local level as well as the 2007-8 financial downturn. It also included the one-off 2012 London Olympic Games which provided a significant regeneration and employment boost to East London and the Olympic borough's, including Tower Hamlets. Much of the jobs and floorspace growth during this period was driven by the financial sector particularly at Canary Wharf (which benefitted from the Jubilee Line extension). 3. GLA projections are not broken down at the sector level and therefore a greater degree of interpretation is required. The Tower Hamlet's 2016 Employment Land Review notes that whilst one should not "dismiss the GLA view", "Repeating the past growth cycle will be ever more challenging". A key factor is a significant labour constraint and the need to import an ever increasing labour force from greater distance. 4. The Experian projections, recognised as one of the top forecasting sources, include an adjustment for Brexit effects and the 2016 Employment Land Review provides narrative on the balance between the Experian 'Brexit' projections and the GLA 'aspirational' projections. Views on the effect of Brexit on the economy remain			Comments noted. It is considered that the council's approach to the Secondary POL and Zone C is justified and supported by evidence which has been prepared between regulation 18 and 19 stages. We recognise the need for mixed use development in CAZ Zone C (tertiary zone) and support new residential development. The 50% threshold has been included in order to protect the strategic function of the CAZ and to set out the council's position clearly on this issue. However, please note that the policy wording of policies S.EMP1 and D.EMP4 will be amended to build in more flexibility and to recognise that proposals will be assessed on a site-by-site basis. Regarding the approved list of workspace providers, we do encourage applicants to work with recognised workspace providers, although the supporting text is clear that this is not a requirement for applicants. The proposed modifications to policy S.EMP1 are set out below: Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use. Secondary Preferred Office Location (POL): These contain, or could provide, significant

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								<p>under debate however there is considerable concern that downward effects will be incurred and that London as a financial centre has one of the greatest sensitivities to negative job outmigration – with Oxford Economics reporting that the financial sector is most at risk of all services (Oxford Economics, Assessing the Economic Implications of Brexit). 5. Whilst the NPPF provides a requirement to ‘plan positively for growth’ the three-fold difference in floorspace requirements between Experian and GLA projections are a cause for concern. Taking the above factors into account, planning for GLA projected growth and policies that seek to protect offices at the expense of other economically active and job creating uses is likely to insufficiently respond to local and wider market signals and have a downward effect on the local economy and efficiency of land use provision. 6. We therefore believe that the development plan is unsound on the basis that policies are just based upon a robust evidence base and are unjustified. Policies S.EMP1 and D.EMP4 7. Part 1 of Policy S.EMP1 seeks to establish the Designated Employment Locations in the Borough. This includes the Central Activities Zone (CAZ). Within the CAZ it is stated that there are opportunities for ‘other employment uses’ within mixed use developments. It also states that equal weight is to be given to proposals for residential, other employment uses or other strategic CAZ functions in this location, including visitor accommodation. 8. This approach is supported and reflects the policies set out within the Central Activities Zone SPG. 9. Policy S.EMP1 supports economic growth in the broader sense, not just in terms of office or industrial uses (B Use Classes). This accords with policies within the National Planning Policy Framework at Paragraphs 18-20 which encourages all forms of economic development and jobs growth. Again this is supported. 10. Notwithstanding, there seems to be some confusion between Policy S.EMP1, Paragraph 5.14, Policy D.EMP4 (3) and Paragraph 5.34 and how these parts of the plan should be applied to a development proposal. NPPF paragraph 154 states that “Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” The conflict between the policies and paragraphs needs to be addressed in order for the plan to be effective and consistent with national policy. 11. Policies S.EMP1 indicates that mixed use development will be sought in the CAZ, comprising employment and/or other strategic CAZ uses. Equal weight will be attributed to these uses and residential use. 12. Paragraph 5.14 however states that a ‘significant quantum’ of</p>			<p>office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided. and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of uses and is more peripheral to the ‘commercial core areas’. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include</p>

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								<p>employment floorspace should be provided in developments in this location, seeking a split of 50% employment and other strategic CAZ uses, and 50% residential. 13. The 50% target sought by Paragraph 5.14 seems to be arbitrary and does not rely upon evidence to support this position. Further, if employment, other strategic CAZ uses and residential uses are equal, why does paragraph 5.14 seek to include a percentage split between them? 14. Related to this, Policy D.EMP4(3) supports the redevelopment of buildings in the CAZ to be up to 100% 'employment use' / 'other strategic CAZ function'. 15. Paragraph 5.34 which supports this policy then states that 'there should be an overall increase in employment floorspace as a result of any redevelopment proposal. Where there is deviation below the 75% and 50% proportions of office floorspace, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.' 16. Policy D.EMP4(3) whilst supported, would seem to conflict with Policy S.EMP1 which seeks mixed use redevelopment in the CAZ. More significantly though, is that paragraph 5.34 could be read that an application for the redevelopment of land/buildings in the CAZ should increase the amount of employment floorspace. It is not clear whether the phrase 'overall increase' is meant as a Borough wide increase, or resulting from each development. Clearly the latter would conflict with both the wording of the policy it supports (D.EMP4) and also S.EMP1 and Paragraph 5.14. 17. These aspects of the proposed plan should be revised to provide clarity as to the expectations placed upon development in the CAZ which seeks the redevelopment of existing employment space. Given that Chapter 5 of the plan is concerned with increasing jobs growth; rather than focussing on the provision of employment floorspace within redevelopments, an alternative strategy could be to seek developments to provide a similar number of jobs. This is the approach taken in the City Fringe Opportunity Planning Framework (2015). 18. Part 2 of Policy S.EMP1 is supported, though it requires further clarification to take account of developments occurring in the CAZ. In this location other strategic CAZ uses are also supported, and in this context Part 2 a - d should all be drafted so as to reflect the contribution non-B Class Uses can make to the Borough's economy. As currently worded, and read alongside Paragraph 5.6, the policy would not clearly recognise the importance of other types of jobs in accordance with the NPPF's definition of 'economic development'. 19. Part 3 of Policy S.EMP1 is broadly supported though we are concerned with supporting text in Paragraph 5.20 which states that "we will</p>			<p>residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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									particularly welcome proposals which demonstrate co-operation with recognised workspace providers, for which we hold an approved list." 20. We are not aware of the list of approved providers within the published evidence base, and this should be made public for review prior to examination. Further, this aspect of the policy is anti-competitive (therefore conflicting with the NPPF) as it implies that unless a workspace provider is 'approved' by the Council then their application may not be treated equally to that of an approved provider. This aspect of the policy is unjustified and should be deleted.			
1142493		Berkeley Group	LP410	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No				D.EMP4: Redevelopment within designated employment areas Part 5 of policy or relevant site allocations should make clear that confirm that 'Gasholders' are sui generis floorspace and not 'industrial uses' which need to be replaced as they do not generate employment Soundness test: Revise to make deliverable and therefore effective	Yes		It is not considered necessary to specifically refer to gasholders within this policy. The Local Employment Location designation at Cambridge Heath merely seeks to retain the existing employment function and character of the area, and promote the delivery of additional employment space of the types specified in Policies S.EMP1.1 and D.EMP4.4f across the designation. This will help meet the borough's overall employment projections and further enhance the vibrancy of the LEL and corresponding designation across the border in Hackney. Furthermore, it is not considered, given the nature of gasholders, that they would meet the definition of Sui Generis industrial functions articulated in paragraph 5.6. As such, there would be no requirement to re-provide the gasholder floorspace as employment space.

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1053884		Queen Mary University of London	LP479	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Effective			ALSO COPIED TO WHITECHAPEL SOUTH SITE ALLOCATION - LIAISE WITH TM /OFFICER Part 4 of Policy D.EMP4 (Redevelopment within Designated Employment Areas) sets out that the redevelopment of LEL's to include non-employment uses will be restricted unless, among other factors outlined in parts a to f, the existing level of employment floorspace is re-provided on site. QMUL consider that it is imperative to ascertain whether this conflicts with the Whitechapel South allocation which allocates housing, in addition to employment led uses, as a land use requirement. QMUL would seek further clarification within Policy D.EMP4 that the land use requirements as set out in the Whitechapel South allocation will not be undermined by the wording of Policy D.EMP4. Overall, QMUL are supportive of both the Whitechapel South allocation and the identification of the site as an LEL, subject to clarification that the policies are not in conflict with one another. SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption. General Development Policies – Clarification required that Whitechapel designated as an LEL does not conflict with the Whitechapel South allocation, particularly with regard to land use restrictions. Additional reference to key worker housing within the sub-text of the specialist housing policy to support the necessary uses that are required to deliver the aspirations for Life Sciences at Whitechapel. The reinstatement of the higher education policy to support the growth of the University over the plan period.			Support for the LEL designation is noted. It is considered the plan already offers sufficient flexibility for uses other than employment to be supported within LELs in line with the requirements of the site allocation.

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624580	Jason Larkin	Canary Wharf Group Plc	LP528	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Positively prepared; Justified; Consistent with national policy		We would reiterate our comments above (on draft policy S.EMP1) in relation to part 2 of draft policy D.EMP4, which states that where residential uses are proposed these should not exceed the proportions set out in policy S.EMP1.			<p>Comments noted. Regarding the proposed employment floorspace thresholds, it is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to</p>

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											<p>accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>

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1143308	Raycliff Whitechapel	Memery Crystal	LP798	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Effective			Draft Policy D.EMP4 (redevelopment within designated employment area This draft policy stipulates that the redevelopment of LELs to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided. It is felt that parts of this policy overlap with draft policy D.EMP3 and S.EMP1 and there may be advantages to amalgamate these policies in the interests of making the Plan more transparent. In addressing the requirement for a re-provision of employment floorspace, sites with a unique or historic employment use such as a B2 industrial use, might also not be considered to be a compatible neighbour in the modern context. B2 uses can require a higher ratio of floorspace relative to job creation. Therefore, the requirement to replace all existing floorspace for alternative B class uses in these circumstances could also be unduly restrictive, particularly in areas where there has been change from largely commercial and industrial uses to more multicultural and creative centres, serving a more flexible range of needs. Straightforward re-provision of other employment uses (i.e. B use classes), therefore, may not produce the most appropriate development, or reflect the site's position having regard to other specific designations (e.g. with respect to the Town Centre Hierarchy, Opportunity Areas, CAZ etc). We would therefore encourage LBTH to consider a wider mix of uses to be included in the definition of "employment floorspace", where appropriate, to include other uses that create other forms of employment such as retail, hotel, cultural, and education, rather than just traditional B class uses. LBTH is also encouraged to exercise its discretion on a case-by-case basis, as the policy identifies, where the owner-occupiers of a property decide to close or relocate their business operation elsewhere (including out of the borough) and/or sell their premises. In these cases, it is not reasonable that the new owners of the site be held responsible in the context of any application made by them to redevelop it. This particularly applies in the case of buildings that have been in specialist use, where re-provision of suitable accommodation elsewhere within the borough may not be possible or desirable. The supporting text for Part 3 of Policy D.EMP4 requires an overall increase in employment floorspace as a result of any redevelopment proposal in the CAZ (zone C). Where there is deviation below the 50% proportion of office floorspace, robust justification is required to demonstrate why this cannot be achieved across the wider designation. Again, we would suggest that LBTH consider altering the wording of this so that it is less restrictive. As specified above, other uses that compliment the CAZ functions and create jobs (rather than just	No		Comments noted. It is not considered necessary to amalgamate parts of policies D.EMP3 and S.EMP1 and it is considered that the scope of employment land as defined in the plan is in line with national and London Plan policy and definitions. Regarding the employment definition, please note that retail, short-stay accommodation, culture and education are referenced elsewhere within the plan. The council considers its employment designations are appropriate and backed by evidence. Regarding non-employment floorspace, there is scope for some level of non-employment floorspace where it supports the function of the area. Regarding the 50% threshold within CAZ Zone C (tertiary area), it is considered that the council's approach is justified and supported by evidence which has been prepared between regulation 18 and 19 stages. We recognise the need for mixed use development in CAZ Zone C and support new residential development. The 50% threshold has been included in order to provide a useful guide to development and to protect the strategic function of the CAZ. However, please note that the policy wording of S.EMP1 will be amended to build in more flexibility and to recognise that proposals will be assessed on a site-by-site basis. The proposed modifications to policy S.EMP1 are set out below: Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs . They are relatively peripheral compared to the P primary and S secondary C cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes . Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.

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									employment floorspace) should be considered acceptable in this context where appropriate, particularly as the CAZ is also renowned for its arts, culture, heritage and leisure uses, rather than mainly business functions.			<p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14:</p> <p>The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone-C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP901	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No				Policy D.EMP4: Redevelopment within designated employment areas It is noted that redevelopment in the CAZ (zone C) should be mixed use to include office or other non-residential floorspace that supports the strategic function of the CAZ. The proportion of residential floorspace should not exceed 50% of the total floorspace within the development proposal. Clarification should be added to this policy to note that residential is not required as part of developments within the CAZ (Zone C) to avoid conflicting with the allocation for the site as a Preferred Office Location. As set out above, the priorities of the Opportunity Areas should also be noted within this policy to strengthen the support for delivery of employment within these areas.			<p>Comments noted. The policy wording has been amended to clarify that residential development is not required as part of redevelopment. The proposed modifications to policy S.EMP1 are set out below:should not exceed 25% of the site area floorspace provided. and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and</p>

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												<p>employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p>
1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP944	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No	Positively prepared; Effective			<p>Draft Policy D.EMP4 (Redevelopment within designated employment area) states that: 2. Redevelopment within the Secondary POL must be employment-led and deliver the maximum viable level of office floorspace, or other non-residential strategic functions within the Central Activities Zone (CAZ). Where residential uses are proposed these should not exceed the proportion set out in policy S.EMP 1. Policy S.EMP1 states that residential should not exceed 25% and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised. Further to the above draft policy text, the draft sub-text of Policy D.EMP4 goes on to add that (underlined for emphasis): 5.33 - Parts 2 and 3 seek to strike an appropriate balance between offices, CAZ strategic uses and housing to meet future growth needs and the place-making objectives of mixed-use development. Within the Secondary POL and CAZ (zone C), any redevelopment proposals should result in an overall increase in employment floorspace and meet the office floorspace proportions required in policy S.EMP1 (see paragraphs 5.13 and 5.14). UNDERLINED FOR EMPHASIS <Where development seeks to deviate from these policy requirements, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.> 5.34 - Parts 2 and 3 seek to strike an appropriate balance between the protection of existing and provision of new office and CAZ strategic uses to meet future growth within with demand for new housing and place making objectives of delivering mixed-use development. UNDERLINED FOR EMPHASIS <Within the Secondary POL and CAZ (zone C), there should be an overall increase in employment floorspace as a result of any redevelopment proposal. Where there is deviation below the 75% and 50% proportions of office floorspace, applicants must provide robust justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation.></p>			<p>Comments noted. It is considered that council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review and Preferred Office Locations Boundary Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ. However, it is accepted that greater flexibility is required. Therefore, the policy and supporting text has been amended to further reflect the CAZ SPG and to allow more flexibility on a case-by-case basis. This includes an additional part to the policy (part 2) as set out in the modifications to policy S.EMP1 below. (Please note that policy D.EMP4 has now also been fully aligned to policy S.EMP1).</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not</p>

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								Given the varying locations of the allocated Secondary POL sites, it is considered that demand for significant volumes of office floorspace in these locations is uncertain and likely to be so for a considerable period. this basis, we consider that the requirements of the site specific allocation and Policy S.EMP1 to deliver 75% of the site in commercial use with ancillary facilities is overly restrictive. Conversely, the draft sub-text of Policy D.EMP4 allows for flexibility in the quantum of commercial and residential uses where it can be demonstrated that the levels of office floorspace sought by the policy cannot be achieved.			<p>exceed 25% of the site area floorspace provided. and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Primary and Secondary Cores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose-built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14: The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary</p>

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1143461	Savills (UK) Ltd Savills (UK) Ltd	Savills (UK) Ltd	LP952	PART 3: POLICIES, 5.32 Paragraph Policy D.EMP4: Redevelopment within designated employment area	No				Policy D.EMP4 (Redevelopment within designated employment area) In addition, we suggest the following additional wording in red to Policy D.EMP4: Redevelopment within the Secondary POL must be employment-led and deliver the maximum viable level of office floorspace, or other non-residential strategic functions within the Central Activities Zone (CAZ). Where residential uses are proposed these should not exceed the proportion set out in policy S.EMP 1 INSERT <unless justification demonstrating why those levels of office floorspace cannot be achieved and how the overall target can be achieved across the wider designation is provided.>			<p>The wording of policy D.EMP4 and supporting text will be amended so that it is completely aligned to the requirements set out in policy S.EMP1. See below the proposed modifications to policy S.EMP1:</p> <p>Primary Preferred Office Location (POL): This predominantly consists of offices and is most suitable for buildings with large floorplates which can provide significant numbers of jobs. It is unsuitable for housing or any other non-strategic Central Activities Zone (CAZ) use which could undermine its strategic function and prevent the delivery of sufficient land for employment use.</p> <p>Secondary Preferred Office Location (POL): These contain, or could provide, significant office floorspace to support the role and function of the Primary POL and the City of London. Significant Greater weight is given to office and other strategic CAZ Central Activities Zone uses as a first priority. Although residential uses can be accommodated, these must should not exceed 25% of the site area floorspace provided, and must robustly demonstrate that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Central Activities Zone (Zone-tertiary area): This zone contains areas of the CAZ outside of the POL-Primary Cores and Secondary Zones-POLs. They are relatively peripheral compared to the Pprimary and Ssecondary Ccores but also provide significant existing employment floorspace and capacity to accommodate future growth. There are opportunities for some larger purpose built office buildings and significant provision of office and other strategic CAZ uses employment uses as part of employment-led or mixed-use schemes. Equal weight is given to proposals for residential and employment or other strategic CAZ functions in these locations, Residential uses are supported as part of mixed use schemes although the proportion of residential floorspace should generally not exceed 50% of the total floorspace.</p> <p>2. Where floorspace thresholds set out in part 1 are exceeded, applicants must robustly demonstrate that the targets</p>

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												<p>cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>Paragraph 5.14:</p> <p>The remainder of the CAZ which is outside of the Secondary POL (the CAZ tertiary area zone C) contains a more diverse range of uses and is more peripheral to the 'commercial core areas'. Within this zone, proposals should consist of or provide a significant quantum of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site, although (a split of approximately 50% employment and other strategic CAZ uses and 50% other uses which may include residential will be encouraged). The proportion of uses will be negotiated on a site by site basis in accordance with parts 1 and 2, with the objective of maximising office and CAZ uses in line with the London Plan and the evidence set out in the Preferred Office Locations Boundary Review.</p>
1142559	Tim Brennan	Historic England	LP447	PART 3: POLICIES, Chapter 6: Revitalising our town centres	N/A			As the draft Plan notes, there are 58 conservation areas across the borough, and many of these cover district or neighbourhood centres. Given the changing nature of the purpose and uses of town centres and the ongoing likelihood of consequent applications for redevelopment, we consider that conservation area designations should be flagged in this part of the Plan. We suggest this could be achieved by adding a new bullet point at the end of policy S.TC1 g. taking account of the relevant conservation area character appraisal and management plan where appropriate.				Comment note. It is considered that an additional reference to policy S.TC1 regarding conservation area character appraisals and management plans adds unnecessary detail. The plan should be considered as a whole.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP662	PART 3: POLICIES, Chapter 6: Revitalising our town centres	No				Meanwhile Use / Empty Sites Despite the presence of a large number of empty vacant sites in the Borough there is no policy encouraging their use either on a permanent or temporary basis (except in relations to Markets). We believe this to be a material omission. The South Quay Masterplan recommends temporary uses and landscaping of decanted/vacant development sites and dock edges including for the following uses: - pop-up retail, affordable workspace, cultural & sporting activities and public art and lighting installations. But there is no such guidance in the Local	Yes		The plan has a number of references to activating vacant sites other than markets: Policy D.EMP2.3d and paragraph 5.23 facilitate temporary employment uses. Policy S.TC1.4f supports proposals at vacant town centre units and sites. Policy D.OWS3.6 encourages community gardens, allotments and parks.

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									Plan. Note: No soundness test undertaken.			
1053510	Zeloof LLP and Truman Estates Limit		LP719	PART 3: POLICIES, Chapter 6: Revitalising our town centres	No				11. 'Brick Lane District Centre Map' 11.1. We have reviewed the proposed district centre designation boundaries for the Brick Lane area and consider that the following areas should also be included within the boundaries. These are integral parts of the district centre and comprise activities or opportunities that will contribute to the overall success and vitality of the district centre. We ask that they be included accordingly. 11.2. Old Shoreditch Underground station on Pedley Street should be included in the district centre. This property has a potentially crucial function as part of the district centre to draw and encourage people to use Allen Gardens, as part of the 'green spine' which is envisioned (and indicated in the 'Spitalfields Place' map) in the current Core Strategy. 11.3. 4-16 Hanbury Street. The district centre is proposed to be extended (on the south side of Hanbury Street) from 18-38 Hanbury Street. However, 4-16 Hanbury Street should also be included in the district centre as they are a natural extension of the district centre offering on Hanbury Street. It is also logical to include 4-16 Hanbury Street within the district centre as the properties directly opposite (11-17 Hanbury Street on the north side of Hanbury Street) are located within the district centre. As can be seen on site the 4-16 Hanbury Street properties are of the same nature and character as the rest of Hanbury Street. 11.4. The properties along Whitby Street, being 2-4 Chance Street, 17-27 Whitby Street and 3 Club Row should be included in the district centre. Given the development of 17-19 Whitby Street at ground level to be a gym use and the development of 25-27 Whitby Street to be A3 and A4 at ground/basement with hotel above, it is not logical for Whitby Street to be excluded from the district centre. As a minimum alternative, it could instead logically be added to the Redchurch Street Neighbourhood Centre. 12. 'Redchurch Street Neighbourhood Centre Map' 12.1. The designated neighbourhood centre only extends from Boundary Street to Club Row within the current iteration of the draft Local Plan. This is illogical and should extend eastwards to include 71-97 Redchurch Street to reflect its overall character and activity as a neighbourhood centre. 12.2. With reference to	Yes		We do not feel it is appropriate to extend Town Centre boundary at this stage which has been determined based on existing evidence of current/future need within the Town Centre Retail Capacity Study (2016), as well as site visits and consideration of built form. Regarding the frontages in question, we feel the properties are too far removed from the Brick Lane shopping area to be included within the boundary, but are still covered within the activity area nonetheless, given them the same protections. We will review all town centre boundaries on an annual basis in order to reflect necessary changes or extensions to centres.

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									Paragraph 11.3 above, if the properties along Whitby Street (being 2-4 Chance Street, 17-27 Whitby Street and 3 Club Row) are not added to the Brick Lane district centre, then it is logical to add them instead to the Redchurch Street Neighbourhood Centre. Note: no soundness text undertaken.			

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1142064	Lucy Rogers		LP114	PART 3: POLICIES, 6.1 Paragraph	No	Effect ive			The Town Centres policy does not elaborate on the provision of employment and in particular the provision of small employment spaces and work spaces that are often found around the back and above town centre areas. In fact a very high proportion of employment is found in town centres. They contribute to a living town centre. They prevent a town centre being used increasingly for residential and provide reasons to visit town centres, which includes social interaction. The policy must include this small employment spaces and work spaces sector in it. Especially as retail is coming under increasing pressure from internet shopping. It leads to the need for other sorts of services provided in the town centres. "If a creative capital is to be a place that lives and breathes – rather than a tradeable abstraction, a mere asset class – then it needs to pursue, counterintuitively, the kind of policies that will restrain its success. The key to a successful metropolis is, paradoxically, a degree of failure. That is what makes experimentation possible. The musicians and artists, the punks, the YBAs and the graphic designers who set the scene slept in cheap studios and lived off the dole. If those are gone where is creative life to happen? If London wants to maintain its position as a city hospitable to the industries its boosters say they support, it needs to make life less comfortable for the speculators and plutocrats they actually seem to woo. That means bringing the property market under control, easing the pace of gentrification and reversing the disastrous policy that allows commercial property to be converted into flats to create expensive housing on the cheap. London is a success story. But this kind of success is exactly what can kill a city." Edwin Heathcote, architecture and design critic for the Financial Times Also see Prof Jane Clossick Town Centre case study http://www.academia.edu/1532513/High_Street_Case_Study_Tottenham_High_Road The section should include a separate category on employment uses, again supported by evidence to find out how town centres are currently being used by small businesses and trades. Town Centres should: --- support a mix of uses including the small and micro-enterprise economy, providing and protecting workspaces that contribute to this sector. --- strengthen the role and function of the area's distinctive and varied town centres to provide a choice of cultural, leisure, retail activities and employment spaces used by small independent enterprises.	No	Does not comply with NPPF para 7 as it not taking an up to date approach to the requirement for employment and small business uses in the town centres. 7. There are three dimensions to sustainable development: economic, social and environmental. ● an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; para 17 ● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then	Comment noted that town centre policies do not elaborate on the provision of small employment spaces. We consider that policies S.TC1 and S.EMP1, in particular supporting paragraph 5.17, already reference the role town centres play in providing employment spaces. It is not considered necessary to amend the plan. Regarding the comment that employment uses prevent town centres being used increasingly for residential and provide reasons to visit centres, we consider that it would not be appropriate to unnecessarily prevent residential use within town centres, as it would be contrary to national and London plan policy. Regarding the third comment supporting a mix of uses to provide a choice of cultural, leisure, retail and employment spaces, we consider that our policies already promote a mix of uses and unit types to support different types of enterprises.

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											<p>meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; para 21 ● set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; ● support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in</p>	

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											<p>economic circumstances;</p> <p>The section should include a separate category on employment uses, again supported by evidence to find out how town centres are currently being used by small businesses and trades. Town Centres should: --- support a mix of uses including the small and micro-enterprise economy, providing and protecting workspaces that contribute to this sector. --- strengthen the role and function of the area's distinctive and varied town centres to provide a choice of cultural, leisure, retail activities and employment spaces used by small independent enterprises.</p>	
1142000		Halfords Ltd	LP57	PART 3: POLICIES, 6.1 Paragraph	No	Consistent with national policy			Within the example of "other areas of...retail activity" provided within the brackets add ", and retail warehouse premises)" This is required in order to recognise that such premises have different locational requirements to traditional town centre retail premises (but provide a valuable role in the shopping hierarchy), as recognised within paragraph 006 of the Planning Practice Guidance: "It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests."	Yes		Comment noted. Larger units including retail warehouses would be directed to town centres so as not to undermine town centres. It is not considered necessary to amend the plan.

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1142985	Transport for London (TfL)	Transport For London	LP729	PART 3: POLICIES, 6.2 Paragraph	N/A			<ul style="list-style-type: none"> TfL would welcome further text to highlight the important roles of these centres in the future, for instance the enhancement and redevelopment of Chrisp Street and Crossharbour and the role they will play for the locality. 				Comment noted. While the importance of the role of the borough's centres is recognised, it is not considered necessary to further amend the supporting paragraphs. Furthermore, details of the proposed regeneration of these sites are set out within the site allocations chapter.
1142000		Halfords Ltd	LP58	PART 3: POLICIES, 6.3 Paragraph	No	Consistent with national policy			<p>The Anchor Retail Park should be added to the centres hierarchy in order that the policy be consistent with the NPPF. It is the Borough's only retail park. There are no other retail warehouse premises within the Borough (i.e. solus units). It therefore provides a consolidated retail destination in its own right. It was approved as recently as 1998 and is under significant threat of redevelopment for uses (residential) that would not enable the retention of the retailers present - Halfords, Currys/PC World and Asda. Its allocation would therefore be consistent with the second bullet point of paragraph 23 of the NPPF, such that the Retail Park's protection would enable it to be resilient to future economic change. The eighth bullet point of paragraph 23 requires local planning authorities to "set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to centres." Aligned to this is paragraph 006 of the Planning Practice Guidance: "It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests." "Large format' bulky goods comparison retailing is land hungry, in order to enable retailers to have sufficient showroom space and storage for the display of large items. Due to the size of products there is a need for car parking in order to enable the transportation of bulky products. These factors, alongside the lack of availability of large enough in-centre locations and costs associated with the acquisition thereof, is the reason why large format retailing is generally always located outside of existing centres. They are particularly relevant to Halfords due to the need for staff to be able to provide on-site diagnostics and fitting of certain products (car batteries, roof boxes etc.). Halfords has genuine locational requirements and remain one of the oldest retailers operating within the sector. They have a vital role to play in environmental terms through the retailing of products designed to keep cars in a roadworthy condition. It is for this reasons that Halfords are nationally exempted from Sunday trading hours restrictions. Generally there is little competition between in-centre and (non-central) large format</p>			The council's evidence base (Town Centre Retail Capacity Study, 2016) has not recommended that the Anchor Retail Park be designated as a town centre. In addition, emerging London Plan policy promotes the redevelopment of out-of-town-centre retail parks and car parks to include residential use. As such, it is not considered necessary to designate the Anchor Retail Park as a town centre.

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									<p>retailing due to the different product types — they occupy different sectors of the retail market with different locational and trading characteristics and are capable of complimenting one another. The government recognizes the retail warehouse sector and requires LPAs to plan for them. We note that other authorities do plan for such retail formats (as required by the NPPF), including the London Borough of Merton (for example in their allocation of 84-88 Bushey Road, Raynes Park, SW20 0JH for bulky goods retailing). It is clear that retail park landowners are exploiting the enormous rise in house prices within London and that residential developers are targeting those landowners who are in possession of larger plots of land. Retail warehouse park store operators are therefore suffering as a result. The planning system must respond positively to these prevailing market forces to ensure a balanced mix of land-uses and prevent out-commuting by residents to access such facilities elsewhere. The consequence of ignoring the role that such retailing has within the Borough is unsustainable. A depleted stock will inevitably lead to increased travel times (out-commuting) and job losses. In terms of the increased travel times, one must be mindful that visits to such facilities generally requiring access to, and journeys to be made by, car. It is generally not possible to undertake such journeys by public transport due to the bulky nature of products. These issues are compounded further by the pressure on alternative retail facilities outside of the Borough, much is which is also unprotected and under increasing and genuine pressure for redevelopment, particularly for further residential accommodation. We have reviewed the Household Surveys provided within the Town Centre Retail Capacity Study 2016: Final Draft Report (undertaken in July 2016) and within the earlier Retail & Leisure Capacity Study (undertaken in July 2008). Within both surveys we are able to assess the level of out-commuting from residents in the 'Home Zone' for Anchor Retail Park to access facilities for a given range of bulky comparison goods categories (only three categories are provided in each of the surveys). We have focused on the Home Zones, as these are relatively central to the Borough. They differ within the two studies because the authors use different zonings. The 2008 survey demonstrates that the most popular destinations for the three product categories are outside of the Borough. It should also be noted that the most popular means of accessing these destinations is by 'car/van as driver', which is not surprising given the comments above. The more recent survey illustrates that within the Home Zone (and with the exception of electrical products) the most popular locations are all outside of the Borough. The Currys/PC World store at Anchor Retail Park is the</p>			

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									most popular location for the purchase of electrical goods within the Home Zone, however this is not surprising given that the retailer is, by some distance, the market leader for such an explicitly defined product category. It does however underline that there would be considerable supply implications for shoppers were the store to be lost, which would also be the case if the retail park were redeveloped. None of the retail park destinations identified as being first, second or third place choices are protected within the relevant local authority development plan proposals map. This puts them also at risk of redevelopment with the effect of increasing out-commuting even further. The information is set out in the table attached to these comments. Halfords are concerned that they may not be in a position to maintain a presence within the Borough. It is reiterated that Anchor Retail Park is the only retail warehouse park within the Borough. Recent trends within London indicate that the supply of bulky goods retail warehousing is being depleted significantly. The poor provision of alternative premises is likely to become worse unless Anchor Retail Park is safeguarded within the hierarchy of centres.			
1049487		Ashbourne Beech Property	LP107	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No	Justified			Policy S.TC1. This relates to the network and hierarchy of centres in the borough. The policy states that development is to support the role and function of the borough's town centre hierarchy and the provision of town centre uses in line with the principles that are set out in the table that accompanies the policy. Crossharbour is one of eight District Centres, whose role is to be promoted as vibrant hubs containing a wide range of shops services and employment. Figure 12, p97 identifies the location of the Major Centre of Canary Wharf and of the various district centres. Paragraph 6.12 says that district centres generally meet more local needs, with catchments of around 800 metres and provision of convenience goods and services. Typically, they contain around 10,000 – 50,000 sq m of retail, leisure and service floorspace and often have specialist functions. They have high levels of accessibility and are generally suitable locations for housing and employment. Table 4, p99 sets out the "proportion of new retail floorspace required" and identifies the amount of convenience and comparison floorspace required for Major and District Centres. Paragraph 6.16 states that the table provides a breakdown of the retail floorspace capacity requirements across the different tiers of centre during the plan period. The Town Centre Retail Capacity Study (2016) is referenced. Can it be explained how the figures included in Table 4 have been derived from the 2016 capacity study?	Yes		Comment noted. The figures in table 4 are derived from the total level of additional floorspace the retail capacity study has assessed as being needed within the borough. Proposals affecting listed buildings would continue to be assessed with regard to policies on heritage.

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635773	Al Mubarakia Ltd		LP209	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	Yes		Policy S.TC1 (Supporting the network and hierarchy of Centres) Policy S.TC1 identifies that in THAAs can 'provide an area of transition between the scale, activity and character of the Central Activities Zone (CAZ) and Canary Wharf Major Centre and their surrounding areas, support a mix of uses which make a positive contribution to health and well-being, and promote active uses at ground floor level'. As mentioned above, Tobacco Dock itself falls within the City Fringe Activity Area. Currently the wider site does not all fall within the Activity Area. Therefore, Al Mubarakia would like to request that the Activity Area is extended to support the redevelopment and delivery of a comprehensive, co-ordinated scheme across the whole site. A site plan is attached to outline the current boundary of the THAA, and the suggested extension (Appendix 1). Secondly, as per Policy S.EMP1			Yes		We do not feel it is appropriate to extend the Tower Hamlets Activity Area boundary at this stage. It is considered that there is already scope within the plan for employment uses to come forward on the Tobacco Dock site, and any potential future extension to the boundary would be reviewed at a future date once the employment floorspace has come forward.

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							<p>above, Al Mubarakia support the aspirations of this policy and would like to ensure that a flexible range and mix of uses are supported within the THAAs. Tobacco Dock is currently used as an iconic events space, which provides a broad mix of flexible uses. It is considered that events space would play an important role in re-vitalizing the THAA. As such, Al Mubarakia would support a flexible approach to the implementation of this policy, which will enable the provision of events space at their site at Tobacco Dock.</p>					

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624910	Sir or Madam	Telford Homes PLC	LP269	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No				Further to our comments made against the Regulation 18 consultation documents, connecting places is, in our view, a key objective for any local plan. We thoroughly support London Borough of Tower Hamlets' ambition in this regard. But for connections to be attractive and safe, they need to be animated and populated. In this regard, we note that Poplar High Street Neighbourhood Centre has been extended into the Blackwall Reach development to the west of the site and this has begun to connect Poplar and Blackwall, building activity along the spine running to the north of the A13 corridor. We think that the importance of Poplar High Street as a key connector should be recognised and that Poplar High Street Neighbourhood Centre should be upgraded to a District Centre extending from Tower Hamlets College in the west to Republic and the lake at East India Dock in the East. It is our view that the opportunity created by Poplar High Street to create a substantive connection between Canary Wharf and Poplar and Blackwall is underplayed in the draft plan and that Poplar High Street is under performing as a centre. It is our view that Poplar High Street could benefit from a greater critical mass, increased identity and anchor uses if it is to become the hub of a creative village that effectively mixes those key elements identified earlier of 'work, live and play'.			At this time, it is considered that the existing boundary of Poplar High Street is appropriate. Retail uses can be supported at East India Dock in line with its LEL designation, in order to support the function of the area. The boundary of the town centre can be further reviewed as part of any future Local Plan review. Even with extension, it is not considered that sufficient floorspace would be provided to justify designation as a District Centre, but regardless designation as a District Centre is made through the London Plan.
719346	John Turner	Ballymore Group	LP274	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No				Policy S.TC1 –Town Centre Hierarchy As discussed with the Council we strongly support the proposed designation as London City Island as a Neighbourhood Centre and the policy approach to this area. We are also in discussions with the Council regarding the extension of the designation to Goodluck Hope and the wider Leamouth South peninsular. The designation of the area as Neighbourhood Centre will help cement the creative cluster coming forward on the Peninsular. The existing creative industries at Trinity Buoy Wharf are currently isolated from the rest of the Borough. The provision of new services will help attract further investment providing a boost to the existing business. We would welcome the opportunity to discuss this approach with the Council further with the desire to create a new centre full of cultural and creative industries accompanied by high quality housing and serviced by excellent public transport (including the Thames Clipper).	Yes		It is considered that the neighbourhood centre designation will be sufficient to facilitate the development of a creative cluster in this location given that there is a notable gap between commercial/leisure at City Island and the provision in Good Luck Hope. The Lower Lea Crossing marks a clear demarcation between geographical areas. The Local Plan also does not preclude out-of-centre development and sets out the circumstances in which these uses will be permitted outside of town centres (i.e. where it does not undermine the vitality and viability of these centres).

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624910	Sir or Madam	Telford Homes PLC	LP281	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No				Chrisp Street Market As noted above, the comprehensive redevelopment of Chrisp Street Market (which Telford Homes are the joint applicants) is being considered by the Council's planning department as a result of the current planning application. This is due to be determined imminently. The draft Local Plan continues to allocate Chrisp Street Market as a 'district centre' which reinforces the aspirations of the town centre as a vital and vibrant shopping and civic function, one which Telford Homes generally supports. As part of the redevelopment proposals for Chrisp Street Market application, the applicants have carried out their own research and have analysed 2011 census data. The 2011 census shows there were circa 66,000 people living within a 15 minute walk from the site. Assuming the consented residential schemes will be built out, there will be an estimated 100,000 people living within a 15 minute walk of Chrisp Street Market by 2020. Telford Homes engaged CACI to carry out market research as part of evidence to support the commercial floorspace proposals as part of the current planning application. The CACI report is attached and submitted to the Council in support of these representations, which estimates the catchment for Chrisp Street has £624m comparison spend of which they estimate Chrisp Street has only a 1% market share. Carter Jonas's recent Retail Capacity Study (2016) reports the same 1% market share for comparison shopping and 1.9% for convenience shopping (paragraph 22.42). Carter Jonas's capacity modelling assumptions explained in detail in Section 17 of their report assumes no changes in market share for both comparison and convenience. Paragraph 17.21 notes that the 'constant market share approach', whilst standard practice is highly theoretical. We would concur and suggest for the Council to achieve its policy aims for Chrisp Street Market and Poplar, the Borough must plan to achieve an increasing market share for Chrisp Street Market for both comparison and convenience retail (paragraph 17.33). Given the minimal market share that Chrisp Street Market currently has, any increase in comparison or convenience retail would not materially impact the vitality and viability of other town centres, such as the major centre at Canary Wharf. The proposed site allocation map at Figure 31 (page 203) has not identified the entire site allocation correctly. A planning application for the demolition of existing garages and erection of a children's Sure Start Centre was granted in October 2016 (ref. no. PA/16/02248). This site also forms part of the wider comprehensive redevelopment proposals for Chrisp Street Market, which will see the relocation of the current Sure Start Centre within the existing market to Kerbery Street as part of this permission. The Centre			We do not feel it is appropriate to extend town centre boundary at this stage which has been determined based on existing evidence of current/future need within the Town Centre Retail Capacity Study (2016), as well as site visits and consideration of built form. We will review all town centre boundaries on an annual basis in order to reflect necessary changes or extensions to centres as a result of future redevelopment.

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									should therefore be included within the wider site allocation for Chrisp Street Market, as a district town centre. Telford Homes proposes that the boundary of the Chrisp Street District Centre should be amended to include the former George Green college building adjacent to the site and other possible redevelopment sites on the opposite side of East India Dock Road to assist in accommodating additional demand for town centre uses as identified in Chapter 10 of the Draft Retail Capacity Study (2016). Poplar HARCA has secured planning permission for the change of use of the premises from educational (D2) to become their head offices (use class B1a). Appendix 1 indicates additional areas that should be considered as part of the Chrisp Street Market district town centre designation. The Draft Retail Capacity Study also notes that there is lack of comparison goods within the town centre, in particular national multiples. It also highlights poor linkages the parade of shops to the east of Chrisp Street Market and it is noted the town centre designation has been extended to include this, which is supported. Further consideration of the extension of the town centre boundary should also be considered by the Council has part of the draft Local Plan to assist in accommodating additional retail occupiers, particularly the national multiples as identified by the Carter Jonas Study. *SEE ATTACHED MAP FOR SUGGESTED AMENDMENT TO DISTRICT CENTRE BOUNDARY*			
1142548	Grafton Group PLC	Grafton Group PLC	LP438	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	Yes		Policy S.TC1 Supporting the network and hierarchy of centres We support the town centre hierarchy as identified within the policy. In particular, we welcome the identification of London City Island as a Neighbourhood Centre as this will help to provide retail and other necessary services for the emerging residential community in the Leamouth area.					Support noted.

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1142556	Regal London	Regal London	LP439	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	Yes		Policy S.TC1 Supporting the network and hierarchy of centres We support the town centre hierarchy as identified within the policy. In particular, we welcome the identification of London City Island as a Neighbourhood Centre as this will help to provide retail and other necessary services for the emerging residential community in the Leamouth area.					Support noted.
624580	Jason Larkin	Canary Wharf Group Plc	LP529	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No	Positi vely prepa red; Justifi ed; Effect ive			Draft policy S.TC1 is the key Local Plan town centre policy, and - in its current form - misses the opportunity to endorse the overarching position statement that Canary Wharf is fulfilling the function and role of a Metropolitan Centre at the current time. The Draft Local Plan aspires to facilitate and support the redesignation of Canary Wharf as a Metropolitan Centre, and Policy S.TC1 should therefore ensure strong consistency with this message as set out in supporting paras. 2.13 and 6.9. The following text should therefore be inserted within the 'Functions/Roles' alongside Canary Wharf within draft policy S.TC1 (table): "Endorse the re-designation of Canary Wharf to a Metropolitan Centre in accordance with its current function and role." Table 4 and supporting para. 6.17 provides a breakdown of retail floorspace capacity requirements across the different tiers of centre during the Plan period based on the Council's 'Town Centre Retail Capacity Study', 2016 ("TCRCS"). The figures presented are low and not set in context based on the conclusions and recommendation provided in the TCRCS by the Council's planning consultants Carter Jonas. Table 4 is inflexible and restrictive, rather than being supportive of economic growth and sustainable development. In order to be justified and effective, the Local Plan must set its need figures in context and avoid the policy framework from preventing further retail/town centre growth and Canary Wharf as encouraged throughout the remainder of the document. The TCRCS endorses this position. The Carter Jonas need forecasts are based on current market shares, and the TCRCS			The London Plan is clear that Canary Wharf has the potential to be reclassified as a metropolitan centre over the plan period. We also recognise that Canary Wharf is now fulfilling this role which has been sufficiently recognised throughout the local plan (see policy S.SG1 and the supporting text to policy S.EMP1). Therefore, until the re-designation is official, we will not change the "major centre" reference in the Local Plan. Regarding Table 4, paragraph 6.17 is considered to offer sufficient flexibility where proposals for additional floorspace come forward that exceed the figures contained within Table 4. Figure 12 does not show town centres the precise boundaries, only buildings within the town centres. That is why North Quay is not shown as there are no existing buildings on the site. However, the Policies Map clearly shows that the site is within the boundary.

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									<p>emphasises that an allowance must be made for Canary Wharf to accommodate more retail/town centre floorspace, above the baseline need forecasts, based on an increase in market share and claw back of trade: "As its starting point, the capacity assessment assumes that the Borough's (convenience and comparison goods) retail market is in 'equilibrium' at the base year and tests a 'constant market share approach' over the forecast period in accordance with good practice." (TCRCS, paragraph 18.35) "it should be noted the capacity assessment does not take account of the potential for major planned investment to increase the rate of expenditure retention for the Borough. Key regeneration schemes for Canary Wharf and Whitechapel are expected to enhance the profile of these centre. For Canary Wharf, the planned provision of 14,000sqm of new comparison goods floorspace could help claw back expenditure lost to Westfield Stratford and Central London. Should this occur an increase in the Borough's comparison goods expenditure retention may increase forecast capacity for Tower Hamlets and its centres." (TCRCS, paragraph 18.37) It is therefore recommended to insert a new paragraph immediately after Table 4 clarifying the context of the baseline need figures as set out in the TCRCS: "The level of need for retail floorspace set out in Table 4 is based on a constant market share approach over the plan period. The figures should not represent a ceiling to new development. New floorspace may enhance the profile of a town centre, helping to claw back expenditure, and increase market share and trade retention." We would also question whether it is appropriate to have a retail demand test as set out in para. 6.17 when assessing planning application, this is not consistent with the retail tests set out in the NPPF. As per our comment on draft Local Plan Figure 11 above, Figure 12: 'Town centre hierarchy' also appears to exclude the North Quay site from the Canary Wharf Major centre. This is inconsistent with the Adopted Local Plan Policies Map as well as the 'Tower Hamlets Town Centre Strategy 2017 to 2022 (March 2017) evidence base document (Appendix 10) which both show a wider area for the Canary Wharf town centre than Figure 12. Figure 12 should therefore be updated to reflect the correct extent of the Canary Wharf town centre boundary. Please refer to Attachment 6 for further details</p>			

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635797	Greater London Authority		LP679	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	N/A			The Mayor is working with Tower Hamlets to develop Canary Wharf into a Metropolitan Centre. This will be reflected in the emerging London Plan. These policies should promote residential development, where appropriate, proportionate to the scale and function of the town centre.				<p>The London Plan is clear that Canary Wharf has the potential to be reclassified as a metropolitan centre over the plan period. We also recognise that Canary Wharf is now fulfilling this role which has been sufficiently recognised in the local plan (see Policy S.SG1 and Policy S.EMP1 supporting text). Therefore, until the re-designation is official we will not change the Major Centre reference in the Local Plan.</p> <p>Regarding the reference of residential development within town centres, an amendment will be made to Policy S.TC1 as set out below:</p> <p>4c. promoting mixed-use and multi-purpose town centres (which include new residential uses where appropriate) with a mix of unit sizes and types to assist in the creation of vibrant centres that offer a diversity of choice, and meet the needs of local communities;</p>
1053510	Zeloof LLP and Truman Estates Limit		LP712	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No				5. Draft Policy S.TC1 'Supporting the network and hierarchy of centres' 5.1. In general, the delivery of new retail and leisure floorspace in District Centres is supported. Whilst it is appropriate to identify a target delivery of retail floorspace, as per table 4, it would be inappropriate to inhibit further growth within town centres beyond these figures, especially where this floorspace is provided as smaller, independent retail units which promote jobs and economic prosperity.	Yes		Comment noted. It is considered there is sufficient flexibility for growth beyond the figures stated in Table 4.
1143156	Hondo Enterprises	Hondo Enterprises	LP770	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	Yes		It is acknowledged that development should support the role and function of the borough's town centre hierarchy and the provision of town centre uses in line with the principles identified. Within the proposed Crossharbour District Centre, vibrant hubs containing a wide range of shops, services and employment will be promoted. The					Support noted.

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							need to deliver new retail and leisure floorspace within the District Centre to meet identified needs is supported.					
1143324		Resolution Property plc	LP828	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No	Effective			Policy S.TC1 (Supporting the network and hierarchy of centres) identifies Thomas More as a Neighbourhood Centre and states and outlines the policy requirements for Neighbourhood Centres. We support the protection of the existing services within the locality. However, we suggest that the reconfiguration and upgrading of the existing retail space is recognised as a benefit of development in Neighbourhood Centres, alongside the provision of new retail space. We suggest the following amendment to paragraph 2 of the policy. 'New development within the Central Activities Zone, Tower Hamlets Activity Areas and designated Major, District and Neighbourhood Centres will be expected to support the delivery of new retail and leisure floorspace INSERT <or re-configure/upgrade existing onsite retail and leisure floorspace> to meet identified needs	Yes		It is considered that the definition of development (see Section 57 of the Town and Country Planning Act 1990) also encompasses redevelopment and refurbishment.
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP902	PART 3: POLICIES, 6.4 Paragraph Policy S.TC1: Supporting the network and hierarchy of centres	No				Policy S.TC1: Supporting the network and hierarchy of centres This policy notes that the London Plan's approach to development within the CAZ will be applied which is supported. Redchurch Street Neighbourhood centre should support the specialist functions that exist to continue providing vibrant shopping and leisure destinations which attract visitors to the borough. New development within the Central Activities Zone and Neighbourhood Centres will be expected to support the delivery of new retail and leisure floorspace to meet identified needs. New development must contribute positively to the function, vitality and viability of the Redchurch St Neighbourhood centre. The aspirations of this policy are generally supported.			Support noted.
1142000		Halfords Ltd	LP64	PART 3: POLICIES, 6.11 Paragraph	No	Effective			The paragraph is not clear. It is not clear what the context is for 'the proposed site' is. Is it referring to all proposals for town centre uses that are not in a designated centre? If this is the case, then the requirements of the paragraph are inconsistent with the NPPF as there is no requirement for an assessment of the mix of uses/consideration of 'over-concentrations of uses' etc.	Yes		This paragraph should not have been included separately, and will be merged back into paragraph 6.10.

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635854	Barts Health NHS Trust		LP235	PART 3: POLICIES, 6.13 Paragraph	Yes		We welcome the explanation / guidance at paragraph 6.13 in relation to the criteria that will be considered when deciding whether to elevate Whitechapel in the town centre hierarchy during the plan period.			Yes		Support noted.
1049487		Ashbourne Beech Property	LP108	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No	Justified			Policy D.TC2 provides specific advice relating to development in town centres. Text is included relating to 60% of ground floor units as A1 in primary frontages with 40% in secondary frontages. The primary and secondary frontages are defined on the Policies Map. Whilst the rationale for the policy is understood, clarity should be sought as to how the 60% figure has been arrived at? Also, the policy refers to "60% of ground floor units"; is this the best way to secure a predominance of Class A1 retail in the primary frontages? Should it not refer to the frontage as opposed to unit numbers?	Yes		The 60% figure is considered appropriate as it maintains a pre-dominance of A1 use, which is needed for our town centres in order to meet the need for the forecast new retail floorspace over the plan period, while allowing suitable flexibility for a range of other town centre uses to come forward. It is also considered that the percentage of units is considered a more suitable measure, also making it easier for the planning department to monitor and assess for planning applications; hence no change to the policy is deemed necessary.
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP337	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	N/A			The policy seeks to set a percentage target for the type of retail unit found within defined primary and secondary frontages. As the draft policy already acknowledges these frontages are suitable for A1 and non-A1 retail uses, the focus of the policy should be the delivery of a town centre that has vitality and viability to ensure that the centres are active, well used and deliver high quality public realm. As such, the policy should not seek to set down prescribed percentage figures for either A1 or non-A1 type uses.				It is accepted that policy D.TC2 (part 6) should include more flexibility. An amendment to the policy will be included to require that robust evidence is provided by the applicant where A1 floorspace cannot be maintained at the current level. The policy will be amended as follows: 6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that: a. the loss of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 23 and 45) (unless there is robust evidence confirming that the proportions of A1 floorspace cannot be maintained at the current level);
1142691		Alliance Property Asia	LP612	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No				POLICY D.TC2: PROTECTING RETAIL IN OUR TOWN CENTRES The policy seeks to set a percentage target for the type of retail unit found within defined primary and secondary frontages. As the draft policy already acknowledges these frontages are suitable for A1 and non-A1 retail uses, the focus of the policy should be the delivery of a town centre that has vitality and viability to ensure that the centres are active, well used and deliver high quality public realm. As such, the policy should not seek to set down prescribed percentage figures for either A1 or non-A1 type uses.	Yes		It is accepted that policy D.TC2 (part 6) should include greater flexibility. An amendment to the policy will be included to require that robust evidence is provided by the applicant where A1 floorspace cannot be maintained at the current level. The policy will be amended as follows: 6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that: a. the loss

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									Note: No soundness test undertaken.			of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 23 and 45) (unless there is robust evidence confirming that the proportions of A1 floorspace cannot be maintained at the current level);
1054252	Londone wcastle	Londone wcastle	LP627	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No	Effective			The policy seeks to set a percentage target for the type of retail unit found within defined primary and secondary frontages. As the draft policy already acknowledges these frontages are suitable for A1 and non-A1 retail uses, the focus of the policy should be the delivery of a town centre that has vitality and viability to ensure that the centres are active, well used and deliver high quality public realm. As such, the policy should not seek to set down prescribed percentage figures for either A1 or non-A1 type uses and the policy must have regard to site specific circumstances. As a result, we do not consider the draft plan to be justified or effective.			It is accepted that policy D.TC2 (part 6) should include greater flexibility. An amendment to the policy will be included to require that robust evidence is provided by the applicant where A1 floorspace cannot be maintained at the current level. The policy will be amended as follows: 6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that: a. the loss of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 23 and 45) (unless there is robust evidence confirming that the proportions of A1 floorspace cannot be maintained at the current level);

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1053510	Zeloof LLP and Truman Estates Limit		LP713	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No				6. Draft Policy S.TC2 'Protecting retail in our town centres 6.1. Protection of retail uses within designated town centres is supported. Flexibility should be incorporated within the policy to allow an appropriate and successful mix of retail functions alongside other supporting uses. The Brick Lane district centre has a unique and distinctive commercial offer which provides a world-renowned tourist destination. A flexible approach to retail and other appropriate town centre uses should be employed specifically within this locality to ensure it can continue to promote its distinct and wider role. We also note that some of the identified designated frontages currently have little or no A1 retail uses within them, a less prescriptive approach towards the provision of A1 retail uses should be employed where the current level of A1 provision is below the identified minimum percentage threshold. 6.2. A flexible approach should be applied to the location of A1 uses within a town centre to allow other supporting town centre uses to prosper alongside more traditional A1 retail uses. A1 retail uses should not therefore be protected where it can be demonstrated that they are being replaced by other supporting town centre uses and the A1 use is being re-provided in a more appropriate location within the same town centre. 6.3. There is a need for the planning policy and supporting text to appreciate that other non-designated frontages are appropriate for retail uses. For instance, in a scenario where future retail development is progressed. To recognise the need for flexibility, the following wording should be added to paragraph 6.23, 'or a broad range of uses which contribute to the support the overall function of the town centre'. Note: soundness test no undertaken.	Yes		It is accepted that policy D.TC2 (part 6) should include greater flexibility. An amendment to the policy will be included to require that robust evidence is provided by the applicant where A1 floorspace cannot be maintained at the current level. The policy will be amended as follows: 6. Where the loss of A1 retail units is proposed within the boundary of a town centre, it must demonstrate that: a. the loss of the A1 units would not result in the overall level of A1 units falling below the proportions set out within policy D.TC2 (see parts 1, 23 and 45) (unless there is robust evidence confirming that the proportions of A1 floorspace cannot be maintained at the current level);
1143324		Resolution Property plc	LP829	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No	Effective			Policy D.TC2: Protecting retail in our town centres sets out the draft retail policies. We recognise that this policy seeks to protect retail provision in neighbourhood Centres, however due to the variety in unit sizes, we recommend that the policy refers to floorspace rather than units. We therefore recommend the following amendment to paragraph 5 of the policy. Within Neighbourhood Centres (except Columbia Road and Redchurch Street) and Neighbourhood Parades, the proportion of units within A1 retail use must not fall below 40% of DELETE<all units> INSERT <floorspace> within the designated centre.	Yes		The percentage of units is considered a better measure than floorspace - it is also easier for the planning department to monitor and assess for planning applications; hence no change to the policy is deemed necessary.

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671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP903	PART 3: POLICIES, 6.19 Paragraph Policy D.TC2: Protecting retail in our town centres	No				Policy D.TC2: Protecting retail in our town centres The allocation of the Redchurch Street Neighbourhood Centre is supported. The policy sets out that development will be expected to contribute to achieving a minimum of 60% of ground floor units as A1 (retail) use; and contribute to the activity and vitality of the town centre by offering space to meet and relax, subject to A1 (retail) units not falling below the threshold set out above. It is considered that a range of A Class Uses should be promoted within centres to create a truly vibrant and mixed-use area.			Support noted.
1033229	Paul Burley	Montagu Evans LLP	LP45	PART 3: POLICIES, 6.30 Paragraph	No	Consistent with national policy			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Managing and Supporting Retail Outside of Our Town Centres The 200 sq m threshold may inhibit the delivery of units exceeding 200 sq m that form part of major regeneration projects but which are in locations that are not currently designated as a centre. The local plan should make clear whether floorspace thresholds are net or gross. In the PDF version the policy number appears to be missing the prefix "D."		0	<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace.</p> <p>Proposed modifications to the policy are set out below:</p> <p>Policy D.TC3</p> <p>1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where:</p> <p>1. Outside of the borough's town centres hierarchy, new retail development will be subject to:</p> <p>a. a sequential test; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.</p> <p>a. individual units do not exceed 200 square metres</p> <p>b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and</p> <p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same</p>

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												<p>criteria and additionally: a. demonstrates local need that cannot be met within an existing designated centre; and b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>
1142035		Hermes Property Unit Trust	LP161	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	Yes			Policy TC3: Retail outside our town centres We support the 200 sq m threshold provided in Part 1 criteria a. The Council should take a pragmatic approach to the consideration of the provision of retail and food and drink uses which form part of major mixed use developments.		Yes		Support noted. It is considered that policies D.TC3 and D.TC5.2 provide a framework for the pragmatism requested.

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635854	Barts Health NHS Trust		LP236	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	No				Managing and Supporting Retail Outside of Our Town Centres The 200 sq m threshold may inhibit the delivery of units exceeding 200 sq m that form part of major regeneration projects but which are in locations that are not currently designated as a centre. The local plan should make clear whether floorspace thresholds are net or gross. The policy number appears to be missing the prefix "D."	Yes		<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace.</p> <p>Proposed modifications to the policy are set out below:</p> <p>Policy D.TC3</p> <p>1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where:</p> <p>1. Outside of the borough's town centres hierarchy, new retail development will be subject to:</p> <p>a. a sequential test; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.</p> <p>a. individual units do not exceed 200 square metres</p> <p>b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and</p> <p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:</p> <p>a. demonstrates local need that cannot be met within an existing designated centre; and</p> <p>b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in</p>

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												<p>accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>
1142493		Berkeley Group	LP412	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	No				D.TC3: Retail outside our town centres Part 1 should include Opportunity Areas and Site Allocations. 200 sqm restriction should be removed or made flexible as it is possible strategic site allocations might for example accommodate a medium sized food store as part of placemaking Soundness test:Positively prepared - potentially limits mixed use on allocated sites	Yes		<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace. Proposed modifications to the policy are set out below:</p> <p>Policy D.TC3</p> <p>1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment</p>

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											<p>locations, transport interchanges and accessible locations along major routes and only supported where:</p> <p>1. Outside of the borough's town centres hierarchy, new retail development will be subject to:</p> <p>a. a sequential test; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.</p> <p>a. individual units do not exceed 200 square metres</p> <p>b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and</p> <p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:</p> <p>a. demonstrates local need that cannot be met within an existing designated centre; and</p> <p>b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.32:</p> <p>New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm</p>

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												gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.
1142000		Halfords Ltd	LP77	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	No	Consistent with national policy			This comment relates to Policy TC3: Retail Outside our Town Centres- Part 1 of the policy is inconsistent with the NPPF - the policy should refer to the same criteria used in paragraph 24 of the NPPF, namely retail proposals outside the Borough's town centres should be directed to edge-of-centre locations and only if suitable sites are not available should out of centre sites be considered. The policy should say that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre. In Part 1 section a, reference is given to a floorspace limit of 200 square metres. This represents a moratorium on larger retail premises. This level of floorspace is inconsistent with large format bulky goods retail warehouse premises, which require large floorplates for the sale and display of larger products (as well as the associated storage space). The Council do not recognize the role which such retail facilities provide to its residents. In Part 1 section b, reference is given to a requirement for shop-fronts to be well integrated. We suggest the words 'wherever possible' be added, as this is not always possible with retail warehouses (and not particularly necessary in terms of aesthetics). In Part 1 section c, this is supported. But reference here should be made to impact testing being only required for non central retail proposals over 2,500 square metres (in order to be consistent with NPPF paragraph 26). Part 2 section a of the policy requires a demonstration of retail need, however this is inconsistent with the NPPF (where there is no 'need' requirements - the government removed such a requirement many years ago). Parts 1 and 2 of Policy TC3 are generally inconsistent with the requirements of paragraphs 23 and 26 of the NPPF and should be simplified to be consistent with them. The moratorium on non central proposals over 200 square metres is			It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace. Proposed modifications to the policy are set out below: Policy D.TC3 1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where: 1. Outside of the borough's town centres hierarchy, new retail development will be subject to: a. a sequential test; and b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace. a. individual units do not exceed 200 square metres b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and

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								<p>not justified. It was not recognized or recommended in the Council's evidence base (Town Centre Retail Capacity Study 2016: Final Draft Report). In Part 3, section a should be reworded to include the word "comparable" so that it reads "the shop is within 300 metres walking distance of the nearest alternative comparable A1 shops." This addition would be consistent with need for the local planning authority to plan positively for main town centre uses which cannot be accommodated in town centres, and also paragraph 006 of the Planning Practice Guidance. This is required because my client's store at Anchor Retail Park is under threat from redevelopment for residential use. It would not be sustainable for a planning application for redevelopment (that excludes the retention of the existing retailers) to succeed on the basis of the loss of retailing at the retail park because there happened to be a small travel agency within 300 metres, as this would not serve the same retail format. This would result in out-commuting to other boroughs because Anchor Retail Park is the only such facility within the Borough. We also suggest that clarification be given as to whether there is a need for the words "and" or "and/or" after Part 3, section a. We would suggest that the word "and" be applied in order to protect existing non central retail floorspace which is still trading, where landlords are seeking redevelopment in instances where existing tenants have no desire to cease trading. This is most particularly relevant to Anchor Retail Park, being the only such facility in the Borough and with evidence (see attached) of out-commuting to other retail warehousing facilities several miles away from residents of the 'home zone' wherein Anchor Retail Park is situated.</p>			<p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:</p> <p>a. demonstrates local need that cannot be met within an existing designated centre; and</p> <p>b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>

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1142000		Halfords Ltd	LP78	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	No	Consistent with national policy			This comment relates to paragraph 6.31 - Here reference is only given to convenience goods. Reference also needs to be made to the comparison goods retail market.	Yes		Comment noted. The current wording is considered sufficient, as generally there would not be a need for immediate access to comparison products.
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP929	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	N/A			This policy does not account of retail uses incorporated into new mixed use developments outside of the borough's town centres, designated employment areas, transport interchanges and locations along major routes, unless it is demonstrated that the provisions of Part 1 and 2 of the policy can be met. New retail floorspace within mixed use developments outside of these locations should be acceptable, with an acknowledgement that retail floorspace on site within mixed use developments can cater for future residents needs and contribute to placemaking. According to Paragraph 6.34, the size limit on individual retail units within Part 1 (a) of the policy is intended to ensure that A 1 retail uses, such as larger convenience supermarkets are directed towards existing town centre boundaries in line with the 'town centre first' approach set out in government guidance. However there is no justification to the specific threshold of 200sqm proposed. It is therefore requested that this be omitted from the policy, and sites be considered against the tests on sequential approach and impact set out in the NPPF, as proposed below:" Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges, accessible locations along major routes and as part of large scale mixed use development and only supported where: & individual units do not exceed 200 square metres; /Ja. shop-fronts are well integrated into their surroundings and are implemented upon completion of the				It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. Proposed modifications to Policy D.TC3 are set out below: Policy D.TC3 1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where: 1. Outside of the borough's town centres hierarchy, new retail development will be subject to: a. a sequential test; and b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace. a. individual units do not exceed 200 square metres b. shop-fronts are well integrated into their surroundings and are implemented upon completion of the development; and c. the role of nearby town centres is not undermined. 2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally: a. demonstrates local need that cannot be met within an existing designated centre; and b. does not affect amenity or detract from

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							<p>development; and eb. the role of nearby town centres is not undermined 2. New A1 retail floorspace will only be supported at other locations to those specified in part I where it meets the same criteria and additionally: a. demonstrates local need that cannot be met within an existing designated centre; and b. does not affect amenity or detract from the character of the area. 3. Development resulting in the loss of A1 retail shops outside of the town centre hierarchy will only be supported where: a. the shop is within a 300 metres walking distance of the nearest alternative A1 shops; b. the shop has been vacant for a period of more than 12 months and robust evidence is provided of efforts made to market the shop unit over that period at an appropriate rent (providing examples of three comparable shop unit rents within the vicinity); or c. the site is unsuitable for continued retail use due to its accessibility, size or condition and there is no viable prospect of a retail use on the site, taking account of the projected residential growth in the vicinity and future need for provision of local shops as part of a sustainable neighbourhood. "</p>				<p>the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorspace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>

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1143387	Berkeley Group		LP930	PART 3: POLICIES, 6.31 Paragraph Policy TC3: Retail outside our town centres	No	Justified; Effective			D.TC3: Retail Outside of Town Centres Draft Policy D.TC3 seeks to support A1 retail floorspace outside of the borough's town centres only where units do not exceed 200sqm, shop fronts are implemented into the surroundings, and where the role of nearby town centres are not undermined. This is a new requirement compared with adopted policy. The London Dock site is located outside of a town centre boundary, and benefits from an extant planning permission consenting up to 10,408sqm (GEA) of retail (Use Class A1/A2/A3/A4/A5) floorspace. Condition 15 of the extant consent sets the maximum amount of floorspace for individual units allowing for the following: § one A1 convenience store of up to 550sqm (GEA); § up to 1,311sqm (GEA) of other A1 convenience floorspace, with no single unit to exceed 500sqm (GIA); § up to 2,186sqm (GEA) of A1 comparison floorspace, with no single unit to exceed 500sqm (GIA); and § up to 1,748 sqm (GEA) of service floorspace. There are instances where the provision of retail units over 200sqm are suitable for an out of town centre location, particularly within large residential applications where new residential communities are established, without undermining the role of nearby town centres. This is supported by London Plan Policy 4.8 (part B d) which supports the provision of additional local convenience shopping and services provision at an appropriate scale in locations accessible by walking, cycling and public transport to serve existing or new residential communities. This is also demonstrated by the London Dock extant planning permission, where it was considered a number of retail units, of up to 550sqm in floorspace, in order to serve the new development are required. This draft policy is therefore not justified, not in accordance with London Plan and not effective. The draft policy does not allow for applications to be considered on a site by site basis. The wording under Part 1a) should therefore be deleted from the policy.			It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace. Proposed modifications to the policy are set out below: Policy D.TC3 1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where: 1. Outside of the borough's town centres hierarchy, new retail development will be subject to: a. a sequential test; and b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace. a. individual units do not exceed 200 square metres b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and c. the role of nearby town centres is not undermined. 2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally: a. demonstrates local need that cannot be met within an existing designated centre; and b. does not affect amenity or detract from the character of the area. Paragraph 6.31: New retail development will continue to be directed towards existing centres in accordance with the sequential approach

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												<p>set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>
1142493		Berkeley Group	LP413	PART 3: POLICIES, 6.32 Paragraph	No				D.TC5: Food, drink, entertainment and the night-time economy Parts 1 and 5a should include site allocations Soundness test: Positively prepared - potentially limits mixed use on allocated sites	Yes		Comment noted. It is not considered appropriate to include site allocations within these policies, as not all site allocations or areas within them will be appropriate for main town centre uses, and policies D.TC5.2 and D.TC5.5 already support such uses outside of areas specified in D.TC5.1 where they are more local in nature and scale.

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1142000		Halfords Ltd	LP81	PART 3: POLICIES, 6.33 Paragraph	No	Consistent with national policy			Paragraph 6.33 references various requirements that are at odds with the established tests of the NPPF (paragraph 24 - the sequential test and paragraph 26 - the impact test). It is suggested that the paragraph does not add anything and should be deleted.	Yes		<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace.</p> <p>Proposed modifications to the policy are set out below:</p> <p>Policy D.TC3</p> <p>1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where:</p> <p>1. Outside of the borough's town centres hierarchy, new retail development will be subject to:</p> <p>a. a sequential test; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.</p> <p>a. individual units do not exceed 200 square metres</p> <p>b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and</p> <p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:</p> <p>a. demonstrates local need that cannot be met within an existing designated centre; and</p> <p>b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in</p>

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												<p>accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>

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1142000		Halfords Ltd	LP85	PART 3: POLICIES, 6.34 Paragraph	No	Consistent with national policy		<p>This paragraph seeks to justify the Council's proposed moratorium on non central retail floorspace over 300 square metres as set out and proposed through Policy TC3. It is inconsistent with the tests of the NPPF (paragraph 24 - the sequential test and paragraph 26 - the impact test) and does not recognise that some retail floorspace formats cannot realistically be accommodated within town centres (paragraph 006 of the NPPG states that "It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests."The Council is not planning positively for such floorspace but instead seeking an outright ban. If other authorities sought to replicate this it could have a devastating effect on the retail warehouse industry sector which requires large format stores for the sale/display and storage of bulky products. As stated in our comments on behalf of Halfords for Policy TC3, we consider that the Council has gone off at a tangent that is inconsistent with national policy. It is reiterated that a 300 square metre limit on non central floorspace was not something that was suggested by their retail advisers in the evidence document entitled Town Centre Retail Capacity Study 2016: Final Draft Report. We urge the Council to frame the tests for such proposals in accordance with the sequential and impact tests enshrined within the NPPF where there is no clear evidence to justify any departure. There is a clear paucity in bulky goods retail warehouse provision with the Borough, with evidence of out-commuting by residents within the 'home zone' of the Borough's only retail warehouse park (Anchor Retail Park). The Council is not planning for the market and Policy TC3 and supporting paragraph 6.33 are naive to the requirements of the sector. This is not sustainable and will exacerbate the level of out-commuting in order for its residents to access such facilities. Anchor Retail Park should be protected and form part of the hierarchy of centres (see our comments on behalf of Halfords in respect of Policy S.TC1.</p>	Yes		<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence has been provided demonstrating its suitability. Please note that flexibility has been added to the policy and supporting text to require an impact assessment should retail proposals exceeding the threshold to come forward in accordance with the NPPF. The policy has also been amended to clarify that it is referring to gross floorspace.</p> <p>Proposed modifications to the policy are set out below:</p> <p>Policy D.TC3</p> <p>1. Development of new A1 retail floorspace outside of the borough's town centres will be directed to designated employment locations, transport interchanges and accessible locations along major routes and only supported where:</p> <p>1. Outside of the borough's town centres hierarchy, new retail development will be subject to:</p> <p>a. a sequential test; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.</p> <p>a. individual units do not exceed 200 square metres</p> <p>b. shop fronts are well integrated into their surroundings and are implemented upon completion of the development; and</p> <p>c. the role of nearby town centres is not undermined.</p> <p>2. New A1 retail floorspace will only be supported at other locations to those specified in part 1 where it meets the same criteria and additionally:</p> <p>a. demonstrates local need that cannot be met within an existing designated centre; and</p> <p>b. does not affect amenity or detract from the character of the area.</p> <p>Paragraph 6.31:</p> <p>New retail development will continue to be directed towards existing centres in</p>

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												<p>accordance with the sequential approach set out in the National Planning Policy Framework (NPPF) which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail exists in locations outside of the Central Activities Zone, Tower Hamlets Activity Areas and designated town centres to meet the immediate convenience needs of local people and/or support the function of designated employment areas. (see part 1).</p> <p>Paragraph 6.32:</p> <p>Size limits on New retail units or extensions outside of the town centres hierarchy have been defined should not exceed 200 sqm gross floorpace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. A1 retail uses, such as larger convenience supermarkets, are directed towards existing town centre boundaries (as defined on the Policies Map). in line with the 'town centre first' approach set out in government guidance. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF.</p>
1052996		Kentucky Fried Chicken (Great Britain) Limited	LP118	PART 3: POLICIES, 6.38 Paragraph	No	Positively prepared			The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 200 metres of a school or leisure centre as zero, but does so without evidence of either a link between harm and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, this has not been objectively assessed. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts. The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. We are further of the view that food of high energy density or poor nutritional value is	Yes		The approach taken to control the development of new hot food takeaways has developed in light of increasing concerns of residents and politicians regarding the overconcentration of takeaways in the borough, especially where they tempt younger residents to consume food unhealthy foods that are high in fat, salt and sugar. There is also strengthening national and local evidence base and revised planning policy guidance relating to this issue. These policies form part of the council's overarching strategy to tackle the borough's obesity and food poverty problems. They aim to prevent hot food takeaways developing in areas disproportionately frequented by children (i.e. in close proximity to schools and local authority leisure centres). Similarly, by ensuring a balance of takeaways within our designated centres, the policy seeks to

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									sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses is both unhelpful and unfair.			<p>promote and protect healthy choices and retain the economic diversity of the borough, as well as protecting the attractiveness, vitality and character of primary frontages.</p> <p>It is acknowledged that hot food takeaways are not the only source of foods that contribute to unhealthy lifestyles, and that not all hot food takeaways provide unhealthy/poor quality food. Nonetheless, within Tower Hamlets, the overwhelming majority of hot food takeaway outlets do provide food of poor nutrition. Furthermore, it is considered that there is no guarantee that a healthy business model would continue into the future under an A5 use class and that it is not an unreasonable prospect that pressures on the business could lead to a change in the nature of the food sold despite the current best intentions of the appellant.</p> <p>The council's approach is more permissive than that proposed in the new London Plan and additional evidence has been compiled by the council's public health team to support the council's position.</p>
1052996		Kentucky Fried Chicken (Great Britain) Limited	LP119	PART 3: POLICIES, 6.38 Paragraph	No	Justified			There is no evidence for any link between harm and proximity of hot food takeaways to schools or leisure centres and only very limited evidence of a correlation between proximity and overweight, so it is unclear how refusing planning permission for hot food takeaways within 200 metres of such locations could ever be justified. The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians. Consequently, it is far from clear how refusing planning permission for hot food take- aways within 200 metres of primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. The Evidence Base contains no evidence of any threshold number of hot food takeaways at which the harm that the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between the proximity of hot food takeaways and the incidence of obesity or overweight at all. It is better to rely on objective evidence in a retail study to set maximum proportions of hot food	Yes		<p>It is acknowledged that hot food takeaways are not the only source of foods that contribute to unhealthy lifestyles, and that not all hot food takeaways provide unhealthy/poor quality food. Nonetheless, within Tower Hamlets, the overwhelming majority of hot food takeaway outlets do provide food of poor nutrition. Furthermore, it is considered that there is no guarantee that a healthy business model would continue into the future under an A5 use class and that it is not an unreasonable prospect that pressures on the business could lead to a change in the nature of the food sold despite the current best intentions of the appellant.</p>

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									takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. As it is usually impractical to apply a maximum frontage proportion outside centres, the 200-metre distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres. In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones.			
1052996		Kentucky Fried Chicken (Great Britain) Limited	LP120	PART 3: POLICIES, 6.38 Paragraph	No	Effective			For the reasons set out in our response highlighting the lack of justification, it is unclear how refusing permission for hot food takeaways within 200 metres of primary schools could ever be effective. Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. It is hard to see how the effectiveness of the policy could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity.	Yes		It is acknowledged that hot food takeaways are not the only source of foods that contribute to unhealthy lifestyles, and that not all hot food takeaways provide unhealthy/poor quality food. Nonetheless, within Tower Hamlets, the overwhelming majority of hot food takeaway outlets do provide food of poor nutrition. Furthermore, it is considered that there is no guarantee that a healthy business model would continue into the future under an A5 use class and that it is not an unreasonable prospect that pressures on the business could lead to a change in the nature of the food sold despite the current best intentions of the appellant.

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1052996		Kentucky Fried Chicken (Great Britain) Limited	LP121	PART 3: POLICIES, 6.38 Paragraph	No	Consistent with national policy			We consider that no regard has been had to national policy and advice in preparing the policy because none of the NPPF policies include dietary issues. The PPG simply refers to a Public Health England Briefing Paper that contains studies on the issue. The NPPF identifies hot food takeaways as a main town centre use that should be located in town centres or in the next most accessible location based on need. Creating zones in which they may not be located inevitably works against this approach. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of facilities and public transport.	Yes		It is not considered the council's approach is inconsistent with national policy, as hot food takeaways are not prohibited from town centres but just parts of them. The council's approach is more permissive than that proposed in the new London Plan and additional evidence is being compiled to support the council's position.
1033229	Paul Burley	Montagu Evans LLP	LP46	PART 3: POLICIES, 6.38 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Food, Drink, Entertainment and the Night-time Economy The reference to "AA uses" at 2 (b) should be corrected.			The General Permitted Development Order was amended in 2017 to introduce a new use class differentiating between drinking establishments with and without food offer - A4 and AA.
1033229	Paul Burley	Montagu Evans LLP	LP47	PART 3: POLICIES, 6.38 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Food, Drink, Entertainment and the Night-time Economy The reference to "AA uses" at 2 (b) should be corrected.			The General Permitted Development Order was amended in 2017 to introduce a new use class differentiating between drinking establishments with and without food offer - A4 and AA.
635773	Al Mubarakia Ltd		LP211	PART 3: POLICIES, 6.39 Paragraph Policy D.TC5: Food, drink, entertainment and the night-time economy	No				Policy D.TC5 (Food, drink, entertainment and the night-time economy) Policy D.TC5 states that the development of entertainment venues within the D2 or sui generis use classes not references in the remainder of policy D.TC5 (therefore excluding A use classes, betting shops, amusement centres, casinos and lap dancing clubs), will be directed to the Central Activities Zone, THAA, Canary Wharf Major Centre and the other designated town centres. Al Mubarakia support the principle of entertainment venues in the THAAs, specifically supporting the development of conferencing and events space within these areas. This policy does not make reference to cultural event spaces, or cultural quarters. However, it is assumed these uses fall under the 'sui generis' category for the benefit of this policy. Policies contained within other Local Plans such as Lambeth1 specifically set out protective policies for cultural attractions. Such attractions are important to the civic and historic importance of the borough, and we would suggest LBTH consider including reference to cultural event spaces within their emerging Local Plan to give clarity to the support in policy for them.	Yes		Comments noted and support welcomed. Regarding reference to cultural event spaces, while cultural event spaces are not referenced within the policy, existing wording is considered sufficient to support them.

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635854	Barts Health NHS Trust		LP237	PART 3: POLICIES, 6.39 Paragraph Policy D.TC5: Food, drink, entertainm ent and the night-time economy	No				Food, Drink, Entertainment and the Night-time Economy The reference to "AA uses" at 2 (b) should be corrected.	Yes		The General Permitted Development Order was amended in 2017 to introduce a new use class differentiating between drinking establishments with and without food offer - A4 and AA.
1053977	Power Leisure Bookmak ers Ltd	Power Leisure Bookmak ers Ltd	LP464	PART 3: POLICIES, 6.39 Paragraph Policy D.TC5: Food, drink, entertainm ent and the night-time economy	No	Positi vely prepa red; Justifi ed; Effect ive; Consi stent with natio nal policy			COPIED FIRST SECTION TO POLICY SG3. We write on behalf of our client, Power Leisure Bookmakers Ltd, to make representations to the Tower Hamlets Local Plan 2031 (Regulation 19). Section 19 of the Planning and Compulsory Purchase Act 2004 requires that development plan documents or any other local development document must have regard to national policy documents and guidance as in the NPPF. Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) regulations prescribes that local plans must contain a reasoned justification of the policies. As set out in the NPPG (Paragraph 014. Reference ID: 12-014-20140306) "appropriate and proportionate evidence is essential for producing a sound Local Plan" and "evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan". Paragraph 182 of the NPPF states that a local planning authority should submit a plan for examination which it considers is sound – namely that it is: positively prepared; justified; effective; and consistent with national policy. The Council will also be aware that as a regulator they must comply with the Regulators' Code (April 2014), laid down in parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006. The Code seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate to reduce regulatory burdens on businesses. We originally made comments, on our client's behalf, on 20 December 2016 in relation to the Pre-Publication Consultation on the Local Plan. We are disappointed to see that our comments have not been taken on board, nor has any additional evidence been introduced to justify the policies proposed in relation to betting shops. Our client's comments concern the provisions of policies TC5 (4) 'Food, Drink, Entertainment and the Night-time Economy' and SG3 'Health Impact Assessments'. In summary, our client considers that betting shops, as an appropriate town centre use, should not be excluded from certain parts of the borough. It is also considered that Policy TC5 (4) and SG3 overlap the considerations of licensing with			Our consultation on the Statement of Gambling Policy 2016 included concerns raised by members of the public that there were too many betting shops in the borough and that their proliferation was in areas of low income and youth vulnerability. Further evidence has been compiled by the council's public health team to help explain our rationale. It demonstrates that the proliferation of betting shops can incur negative social and health impacts on local communities as well as harming the attractiveness, vitality and character of town centres. This is the reason why we have sought to restrict their proliferation within particularly important or vulnerable areas which attract high levels of footfall and activity.

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									<p>those of planning. There are therefore elements of the Plan which require amendments and /or explanation before the Plan can be considered 'sound'. Specific comments can be found below. Comments Policy TC 5 (4) – Food, Drink, Entertainment and the Night-time Economy Exclusion of Betting Shops from Primary Frontages Despite the removal of the element of TC2 which sought to exclude betting shops from Primary Frontages, TC5 (4) appears to continue to seek this restriction, without justification. In addition, it is continually disappointing to see that the Policy seeks to exclude the possibility for betting shops to locate in neighbourhood centres, neighbourhood parades and other nondesignated locations. Betting shops, as a recognised town centre use, are appropriate in smaller centres, and there is no clear justification for their exclusion. None of the evidence produced by the Council indicates that betting shops might have a negative impact upon smaller centres. If adopted, this part of the policy will restrict a legitimate town centre use that would like to operate within certain areas of the borough. There is no reasonable explanation via policy evidence, or otherwise, as to why betting shops are not considered to be suitable within the primary frontage, smaller centres or non-designated locations. There is a real danger that adopting such an approach will effectively place a moratorium on such new uses in centres. Clearly such an approach is inappropriate and would fly in the face of the NPPF, which seeks to encourage shops and services to locate within centres, rather than in out of centre locations. We are concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres”. Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. It is important to highlight that since the Use Class Order changed in April 2015, betting shop uses are now considered under the 'Sui Generis' use class (rather than A2) and an application is now always required for the change of use to Betting shop uses. Policy TC 5 restricts the use completely from the primary frontage of its town centres which is completely unreasonable and unsubstantiated. Again, regard needs to be had to the very real impact that the policy is likely to have on a number of different industries and the clear conflict that would arise with the NPPF. We consider that the Plan would be unsound on the basis that it is not positively prepared (it effectively discriminates against</p>			

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								<p>legitimate town centre uses and particular uses such as betting shops), it is not based on credible evidence and therefore not justified, nor is it consistent with national policy (as it is not compliant with the NPPF as outlined above). Restrictions Policy TC5 (4) also states that development for new betting offices/shops will only be considered in the CAZ, Activity Areas or secondary frontages within Major and District Centres. Such uses will be resisted where: a. there is an over concentration of such uses which could give rise to negative cumulative social impacts; b. the site is in close proximity to a school or sensitive community, cultural or social facilities; and c. the proposal would detrimentally impact the amenity and character of the area. In relation to point a) and control over the clustering of uses, it is recognised that the London Plan Town Centres SPG (July 2014) states that Councils are encouraged to manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets. We therefore do not have any objections to the Council seeking to control this. In relation to items b) of the policy, and the resistance to betting shops in close proximity to a school or sensitive community, cultural or social facilities, it is clear that there is a significant and unnecessary overlap with the Gambling Act 2005 Licensing Objectives (reproduced below). The Licensing Act already controls the impact that a new betting shop may have on vulnerable people in the community. • Ensuring gambling is kept free from crime and disorder. • Ensuring gambling is conducted in a fair an open way. • Protection of children and vulnerable adults. This part of the policy should be removed in order to avoid an overlap between licensing and planning considerations. Since our initial comments, submitted on 20 December 2016, no additional evidence to justify proposed Policy TC 5, has been submitted. The March 2017 document 'Tower Hamlets Town Centre Strategy 2017 to 2022' has been prepared and now forms part of the evidence base. There is nothing within this document that suggests that excluding betting shops from primary frontages, neighbourhood centres, parades or non-designated locations would enhance the borough's town centres. There is also nothing to suggest that existing betting shops within these locations are having a negative impact. It is peculiar that betting shops are excluded from these areas, yet the same policy TC5 indicates that Sui Generis uses, such as nightclubs, could be acceptable in those locations. Summary We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any concentrations which would lead to negative impacts, however, to assert unnecessary vetoes on areas where betting shop</p>			

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									operators can locate (when there is no robust evidence to support the approach) is wholly unsubstantiated and does not allow officers/members to make objective decisions. It also places unnecessary burdens on betting shops operators who already need to submit an application when looking for new units. In summary, our comments are as follows: • Policy TC5 (4) – It is unclear why the Council are seeking to exclude betting shops from primary frontages, neighbourhood centres, neighbourhood parades or other non-designated centres within the borough. Betting shops are appropriate town centre uses and no evidence has been produced that suggests betting shops are inappropriate in these areas. • Policy TC5 (4) – There is a clear overlap between the provisions of this policy and the licensing considerations for betting shops legislated by the Licensing Act. • Policy SG 3 – There is no evidence to suggest that there is a link between health and betting shops. We suggest that LB Tower Hamlets consider the points raised within this letter and take our client's comments into consideration in the preparation of the plan and request that you keep us informed on further progress and consultations.			
635797	Greater London Authority		LP681	PART 3: POLICIES, 6.39 Paragraph Policy D.TC5: Food, drink, entertainment and the night-time economy	Yes		Controls over hot food take-aways, betting hops etc are broadly supported, in line with London Plan Policies 3.2 and 4.8g and their supporting text.					Support noted.
635797	Greater London Authority		LP682	PART 3: POLICIES, 6.39 Paragraph Policy D.TC5: Food, drink, entertainment and the night-time economy	N/A			There appear to be two small errors in proposed Policy D.TC5, parts (1) and (2b).				The General Permitted Development Order was amended in 2017 to introduce a new use class differentiating between drinking establishments with and without food offer - A4 and AA.
1033229	Paul Burley	Montagu Evans LLP	LP48	PART 3: POLICIES, 6.45 Paragraph	No	Consistent with national policy			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Short-stay Accommodation Whilst this draft policy says that visitor accommodation will be supported in the Borough's higher-order centres including district centres, it says that the need for such accommodation should be demonstrated. Hotels are a 'main town centre use' (as defined by the NPPF) and therefore there should not be a requirement to demonstrate a need where such a facility is proposed			While it is accepted that hotels are a main town centre use and an important use to developing the visitor infrastructure of Tower Hamlets, it would be detrimental to the health of town centres should an over-concentration develop. Over-concentrations can harm the character of a place both directly (e.g. creating noise and disturbance for neighbouring residents) and indirectly

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									in one of the centres listed in the draft policy.			(by generating a high level of transience in the overnight population). Furthermore, an over-concentration can also lead to a loss of land suitable for uses of greater priority, such as housing or employment. For example, hotels often provide lower employment densities according to the Employment Density Guide (Homes and Communities Agency, 2015), which means that other employment uses providing higher employment densities would be preferred where there was a conflict over available development land.
635773	Al Mubarakia Ltd		LP212	PART 3: POLICIES, 6.46 Paragraph	Yes		Policy D.TC6 (Short-Stay Accommodation) Policy D.TC6 states that 'development of visitor accommodation will be supported in locations within the Central Activities Zone, Canary Wharf (Major Centre), Tower Hamlets Activity Areas and District Centres (as shown on the Policies Map) or along primary routes where adjacent to transport interchanges'. Al Mubarakia are supportive of the THAAs being appropriate locations for visitor accommodation.			Yes		Support noted.
635854	Barts Health NHS Trust		LP238	PART 3: POLICIES, 6.46 Paragraph	No				Short-stay Accommodation Whilst this draft policy says that visitor accommodation will be supported in the Borough's higher-order centres including district centres, it says that the need for such accommodation should be demonstrated. Hotels are a 'main town centre use' (as defined by the NPPF) and therefore there should not be a requirement to demonstrate a need where such a facility is proposed in one of the centres listed in the draft policy.	Yes		While it is accepted that hotels are a main town centre use and an important use to developing the visitor infrastructure of Tower Hamlets, it would be detrimental to the health of town centres should an over-concentration develop. Over-concentrations can harm the character of a place both directly (e.g. creating noise and disturbance for neighbouring residents) and indirectly (by generating a high level of transience in the overnight population).

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												Furthermore, an over-concentration can also lead to a loss of land suitable for uses of greater priority, such as housing or employment. For example, hotels often provide lower employment densities according to the Employment Density Guide (Homes and Communities Agency, 2015), which means that other employment uses providing higher employment densities would be preferred where there was a conflict over available development land.
1142424	OCM Luxemburg Buckle Street Apart-	OCM Luxemburg Buckle Street Apart- Hotel Sarl	LP286	PART 3: POLICIES, 6.46 Paragraph	No	Justified; Effective			D.TC6: Short-stay accommodation 28. Policy D.TC6 relates to short stay accommodation. Within the Glossary, short stay accommodation is defined as hotels, apart-hotels, serviced apartments and hostels. Within the policy however, there is no distinction made between these forms of accommodation other than to refer to serviced apartments in Part 2 and seeking to restrict occupancy to 90 days. 29. If the policy intends to only restrict the occupancy of serviced apartments to 90 days, this policy is supported. If however, this part of the policy is also to be used to restrict the occupancy of apart-hotels to 90 days, this would be considered unjustified and without a sufficient evidence base to support this approach. 30. Serviced apartments and apart-hotels are two distinct types of accommodation and fall within different Use Classes. Serviced apartments are typically sui generis use whereas apart-hotels are Use Class C1. Because they are different use classes, the way in which they are controlled should be different also. 31. For example, an apart-hotel is C1 Use Class and should therefore be treated the same way as a hotel in terms of occupancy restrictions. It is a purpose built hotel product aimed at transient populations, as defined in case law. Hotel occupancy is not restricted to 90 days, and there is no justification for the occupancy of an aparthotel to be restricted either. The function of an aparthotel room undoubtedly gives the ability for guests to stay longer, but rarely do guests cease to be 'transient'. 32. The laws stipulating a maximum of 90 days occupation (Greater London Powers Act 1973 and Deregulation Act 2015) are intended to apply only to residential accommodation (Use Class C3) not apart-hotels. 33. It may be useful to include a definition of apart-hotel in the local plan (either in Policy D.TC6 or in the glossary. We suggest the below wording: "Apart-hotel - hotel accommodation (Use Class C1) that provides for occupancy purchased at a nightly rate with no deposit against damages. Typically the following will apply: - larger units than at a standard hotel including mix of studios, one-bedroom and two bedroom suites; - In-room kitchenette and bathroom; - No minimum or maximum stay but occupied by a transient population;			Comments noted. As set out in paragraph 6.50, the council's position is clear that apart-hotels and serviced apartments must not be occupied for periods longer than 90 days. This restriction is set out in legislation (Deregulation Act 2015).

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									· - Branded buildings; · - 24/7 manned reception on site, room telephone connection to the front desk; · - Additional services on demand; · - On-site laundry if not provided in units; · - Telephone and internet provided by operator and included in price; · - The use will be secured in the form of a licence, not a lease; and · - The occupants of the room will not have exclusive possession of the room.” 34. When defined in this way, the need for 90 day occupancy restrictions could be avoided. If operated as outlined above apart-hotels would be distinct from serviced apartments and residential uses. As with other C1 accommodation, planning conditions should be used to control unauthorised change of use, and beyond Greater London this is normally the case.			
1054236	EID Partners hip		LP295	PART 3: POLICIES, 6.46 Paragraph	N/A			Further to the above, it is noted that Policy D.TC6 sets out that development of visitor accommodation will be supported in locations within the Central Activities Zone, Canary Wharf (Major Centre), Tower Hamlets Activity Areas and District Centres (as shown on the Policies Map) or along primary routes where adjacent to transport interchanges, providing: a) the size, scale and nature of the proposal is proportionate to its location; b) a need for such accommodation can be demonstrated, taking account of other proposals and unimplemented consents in the local area; c) it does not compromise the supply of land for new homes or jobs and our ability to meet the borough’s housing and employment targets; and d) the applicant can demonstrate adequate access and servicing arrangements appropriate to the scale, nature and location of the proposal. As discussed earlier, the function of office locations should be supported by a range of compatible land uses to address the changing market for offices. In respect of the list of acceptable locations for hotel uses, it is considered that the following wording should also be included “or in Local Employment Locations where they support the employment functions of the area.” In respect of point a) this wording is not clear or relevant as hotel uses serve a varying catchment areas and should not always only serve the immediate				It is not considered necessary to reference Local Employment Locations within policy D.TC6, given that all Local Employment Locations contain locations or designations where such provision can be supported. With regards to part a, the policy does not reference short-stay accommodation as serving a particular catchment. Part b is considered justified, as it aims to prevent an over-concentration of short-stay accommodation. With regards to part c, it is considered that short-stay use would not displace housing or employment use in every circumstance. The primary objective is to ensure that viable sites for housing or employment to meet identified needs are not lost, for consistency with other policies such as policy S.EMP1.

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								area. Point b) places the onus on the applicant and the need for hotel uses should not need to be provided in each application. If the Council are concerned about an over proliferation of hotel uses, this should be denoted or described within the policy. Point c) this point is not clear as in all cases, space for housing and or employment uses would be displaced by the delivery of a hotel use. The council should further explain what they would like to achieve by this wording. Point d) this wording is supported.				
1142493		Berkeley Group	LP415	PART 3: POLICIES, 6.46 Paragraph	No				D.TC6: Short-stay accommodation Parts 1 should include site allocations soundness test: Positively prepared - potentially limits mixed use on allocated sites	Yes		Comment noted. It is considered that the current policy wording is appropriate, and site allocations are managed elsewhere within the document.
1143156	Hondo Enterprises	Hondo Enterprises	LP771	PART 3: POLICIES, 6.46 Paragraph	Yes		It is acknowledged and supported that visitor accommodation will generally be appropriate within areas including District Centres subject to the various considerations.					Support noted.
1143367	WEST INDIA PROPERTY INVESTMENTS	WEST INDIA PROPERTY INVESTMENTS LIMITED	LP890	PART 3: POLICIES, 6.46 Paragraph	N/A			We support the amendments to the policy for short-stay accommodation. However, we consider that the within Paragraph 1, reference should be made to opportunity areas as being suitable for short-stay visitor accommodation. In addition, we note the reference within Policy D.TC2 to 'it does not compromise the supply of land for new homes or jobs and our ability to meet the borough's housing and employment targets'. We consider the policy would benefit from confirmation as to how this element of the policy is measured and assessed.				It is considered that not all parts of opportunity areas will be appropriate locations for short-stay accommodation, therefore no change will be made to the spatial guidance set out in policy D.TC6.1. An additional paragraph will be added to the supporting text referring to part 1c, as set out below: 1c) it does not compromise the supply of land for new homes (as per the housing trajectory set out in appendix 7) or jobs and our ability to meet the borough's housing and employment targets; and
1053881	Sally Styles	C M A Planning Ltd	LP90	PART 3: POLICIES, 6.46 Paragraph	No	Justified			D.TC6 (part 1c) – Short Stay Accommodation Comment: As per previous comments made in respect of the Regulations 18 consultation in respect of Policy TC7 Part 1c (as was), the previous objections are maintained. As previously stated this requirement is unreasonable as not all sites will be suitable / available for conventional residential use for planning or other commercial reasons. Some sites will be better suited to short stay accommodation. Furthermore, the	Yes		Comment noted regarding policy D.TC6 (part 1c). While it is accepted that some sites will not necessarily be the optimum locations for housing or employment use, it is considered appropriate to retain part c to ensure that viable sites for housing or employment to meet needs are not unnecessarily lost. Please note that some clarification will be provided as per the

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									current version of this policy also refers to jobs and employment targets. Some sites may be best suited to temporary accommodation. Suggested Amendment: Delete Part 1c			modifications below: 1c it does not compromise the supply of land for new homes (as per the housing trajectory set out in appendix 7) or jobs and our ability to meet the borough's housing and employment targets.
1142656	Rabina Khan		LP546	PART 3: POLICIES, 6.47 Paragraph	Yes		The plan recognises the need for developments that are relevant for the locality thus prevention of over-development thus preserving space for actual needed developments or developments that do not benefit TH.					Support noted.
1033229	Paul Burley	Montagu Evans LLP	LP49	PART 3: POLICIES, 6.50 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Markets The proposed policy says that markets will be directed to town centres and should enhance the centre's existing offer and contribute to vitality. Whilst this is supported in principle, it should be recognised that great care will need to be taken in deciding the location of new or relocated market provision. If access to or visibility of retailers' premises is masked by market stalls, this could prove harmful to the trade of permanent businesses in the borough's defined centres. Consideration must also be given to safe and efficient pedestrian movement on the capital's increasingly-busy footways. It is therefore essential that the proposed policy requires consideration of the effect of new or relocated market provision on existing businesses and that adjacent landowners and occupiers are fully consulted.			It is considered that existing wording is sufficient to ensure that markets would not negatively impact existing uses. Part 2 of the policy requires that proposals for new markets 'enhance the centre's existing offer and contribute to vitality and cohesion'. Part 3 of the policy supports proposals for new markets outside of town centres only where they do not undermine the borough's existing markets and town.
635854	Barts Health NHS Trust		LP239	PART 3: POLICIES, 6.51 Paragraph	No				Markets The proposed policy says that markets will be directed to town centres and should enhance the centre's existing offer and contribute to vitality. Whilst this is supported in principle, it should be recognised that great care will need to be taken in deciding the location of new or relocated market provision. If access to or visibility of retailers' premises is masked by market stalls, this could prove harmful to the trade of permanent businesses in the borough's defined centres. Consideration must also be given to safe and efficient pedestrian movement on the capital's increasingly-busy footways. It is therefore essential that the proposed policy requires consideration of the effect of new or relocated market provision on existing businesses and that adjacent landowners and occupiers are fully consulted.	Yes		It is considered that existing wording is sufficient to ensure that markets would not negatively impact existing uses. Part 2 of the policy requires that proposals for new markets 'enhance the centre's existing offer and contribute to vitality and cohesion'. Part 3 of the policy supports proposals for new markets outside of town centres only where they do not undermine the borough's existing markets and town.

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1053788	Steve Craddock	The Canal & River Trust	LP355	PART 3: POLICIES, 6.51 Paragraph	No	Consistent with national policy			We question why policy D.TC7 only supports new markets outside of town centres where they are temporary in nature and how the council would define 'temporary' in this case. We suggest that if the proposal complies with the requirement not 'to undermine the borough's existing markets and town centres' and does 'not cause unreasonable harm to the amenity of surrounding properties' then a proposal should be supported, in accordance with the presumption in favour of sustainable development and aim of supporting a strong, competitive local economy in the NPPF.			It is considered that existing wording is sufficient to ensure that markets would not negatively impact existing uses. Part 2 of the policy requires that proposals for new markets 'enhance the centre's existing offer and contribute to vitality and cohesion'. Part 3 of the policy supports proposals for new markets outside of town centres only where they do not undermine the borough's existing markets and town.
1053510	Zeloof LLP and Truman Estates Limit		LP714	PART 3: POLICIES, 6.51 Paragraph	No				7. Draft Policy D.TC7 'Markets' 7.1. Markets contribute towards creating vibrant and diverse retail uses to the borough and they should be supported through planning policy accordingly. It is necessary however to ensure that any proposals for markets will not compromise or prejudice other town centre uses and activities. This includes locating markets whereby they affect the trading ability of an existing or potential future retail unit in a town centre. The policy wording should be updated to reflect this accordingly.	Yes		Comment noted. It is considered that existing wording is sufficient to ensure that markets would not negatively impact existing uses. Part 2 of the policy requires that proposals for new markets 'enhance the centre's existing offer and contribute to vitality and cohesion'. Part 3 of the policy supports proposals for new markets outside of town centres only where they do not undermine the borough's existing markets and town.
1142064	Lucy Rogers		LP88	PART 3: POLICIES, 6.51 Paragraph	No	Justified			Markets are organic in nature and can only function through the individual traders who operate them. Policy therefore must include the addition of those traders in discussions about possible changes to markets. "overall quality of market and public realm" is subtle and can mean different things to different people. and some improvements risk losing the character and therefore selling-point of the market, or losing the customers who may need it most. It is therefore vital that any changes to a market are supported by accurate assessments of what the market provides and to whom (for example affordable produce) and by the necessity of consultation with traders and customers and their inclusion in any discussions of plans.	No	Must accord with NPPF para 7 in providing for all sections of the economy. 7. There are three dimensions to sustainable development: economic, social and environmental. • an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of	Comment noted. It is considered that no change is necessary, as the explanation text already makes clear the policy seeks to protect the role and function of markets and that the needs of traders are addressed.

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											<p>infrastructure; para 17 ● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; para 21 ● set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; ● support existing business sectors,</p>	

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											taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;"Any changes to a market are supported by accurate assessments of what the market provides and to whom (for example affordable produce) and by the necessity of consultation with traders and customers and their inclusion in any discussions of plans."	
790873	Sport England	Sport England	LP836	PART 3: POLICIES, Chapter 7: Supporting community facilities	No	Positively prepared; Effective; Consistent with national policy			Indoor and outdoor sport facilities, including playing field, is addressed throughout many different policies within this chapter and has limited mention within those policies and supporting text. Sport England are concerned that sport infrastructure actions and requirements are lost and would be given less priority than, for example, general open space. Although many playing fields are open space parks the general approach the Council have taken with the Local Plan and poorly integrating playing field and sporting needs within the Open Space Strategy does not adequately plan for sport. Sport England would want to see at least a specific policy that relates to sport facilities but preferably one policy relating to outdoor sport facilities and another that focuses on indoor sport facilities that are informed by up-to-date and robust strategies that the Council still have to develop (Sport	Yes		Paragraph 7.7 clarifies that outdoor sport facilities are also important community facilities and are covered under Policies S.OWS1 and D.OWS3). Further clarification will be added to this paragraph as follows: Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities. Paragraph 7.7 has been amended by making minor modification as thus: Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities. These are addressed within (see policies S.OWS1 and D.OWS3).

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								<p>England do not consider the strategies developed so far are robust given the methodology followed and lack of stakeholder involvement). Sport England appreciates that paragraph 7.2 is an introduction, but states that there are need gaps for indoor sports facilities but does not state that outdoor sport facilities, playing fields and playing pitches have need gaps. Tower Hamlets Playing Pitch Assessment (PPA) (which has yet to be signed off by stakeholders, although should be shortly) highlights deficits which raises questions whether the PPA has been used to inform the Local Plan. Although the PPA is not a strategy it is a starting point that should inform a strategy. The PPA states the strategy, which would follow Sport England's Playing Pitch Strategy Guidance, would sit within the Open Space Strategy however there is no such strategy or action plan that can be considered to be a robust strategy for sport. It is too vague, does not set out priorities, timelines, what facilities are actually required and has not been developed with stakeholders. Tower Hamlets Indoor Sports Facility Strategy raises similar concerns. As a result, in terms of indoor and outdoor sport facilities, the Council are unable to "ensure that sufficient facilities are provided to meet the needs of the borough's growing population in the areas of greatest need and growth" as stated in paragraph 7.3.</p>			<p>The Playing Pitches Assessment includes an assessment of the borough's playing pitches and outdoor sports facilities following Sport England's Playing Pitch Strategy Guidance. The findings of the Playing Pitches Assessment, which has been reviewed and agreed by all NGBs have been used to inform part E of the Open Space Strategy.</p> <p>The Open Space Strategy includes an overarching open space action plan, also containing high level actions relating to outdoor sport facilities.</p> <p>The Indoor Sports Facilities Strategy includes assessment of the borough's indoor sports facilities and specific strategic options and objectives.</p> <p>With consideration to the significant level of overall open space deficiency in Tower Hamlets and the competing demands on the borough's open spaces (including playing pitches), the Open Space Strategy takes a more holistic approach that considers all open space needs, including space for outdoor sports. Embedding considerations for outdoor sports in the Open Space Strategy allows multiple demands on the borough's limited open spaces to be balanced more effectively in a very diverse and densely populated borough like Tower Hamlets.</p> <p>In addition and based on the Open Space and the Indoor Sport Facilities strategies, the Infrastructure Delivery Plan is a key document supporting the Local Plan. It provides an assessment of the current supply and future need for indoor sport facilities and outdoor sport facilities and playing pitches (included in the open space sections of the document) and identifies specific projects to help address this need. Furthermore, a more detailed action plan has been/will be prepared based on the findings of the Playing Pitches Assessment and will be incorporated into the next update to the Infrastructure Delivery Plan. On these bases it is considered that the local plan provides an adequate framework for sustainable planning for indoor and outdoor sport facilities, including playing pitches.</p>

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1142493		Berkeley Group	LP359	PART 3: POLICIES, Chapter 7: Supporting community facilities	No	Justified; Effective; Consistent with national policy			<p>Justified: No, infrastructure planning has not fully tested options Effective: No, over-allocation without flexibility leaves potential for parts of sites to be blighted by unnecessary infrastructure allocations Consistent with national policy: No, combined weight of obligations not consistent with para 173 of the NPPF The growth in population in Tower Hamlets as a result of new housing will require new supporting social and physical infrastructure. The Council has sought to plan for this infrastructure through its Infrastructure Delivery Plan and various other supporting documents. Whilst such planning is inherently uncertain due to changing demographics and housing delivery rates the Council acknowledges that, for the largest item of social infrastructure, Secondary Schools, it has allocated more sites than it requires. Our review of the Council's background planning documents suggests that it may also not have properly taken into account the potential role that Free Schools and Academies – the Government's preferred approach to the delivery of new school places – can make to meeting these identified needs. Policy D.CF3 sets out the generic policy for school provision stating: Development of new early education and care facilities and primary and secondary schools which respond to local need will be supported where:</p> <p>a. they are in locations which are accessible to the residents of their indicative catchment areas; b. they can demonstrate appropriate learning spaces (including external play space) can be provided; and c. the design and layout of these facilities and play space provision reflects the relevant guidance from the Department for Education and Sport England, taking account of the level of air quality and other amenity considerations. This does not however provide helpful guidance to Developers – particularly those with such facilities allocated to their sites given the wide variations allowed by Building Bulletin 103, the current Department for Education Guidance. The Council has then, on a site by site basis, allocated facilities to sites, notionally following its site allocations methodology. It has allocated five sites for Secondary Schools including the two with current planning permissions (London Dock and Westferry) when it acknowledges it only needs four in total and in practice this could be three or fewer if Free Schools come forward. The Council's most recent schools planning work notes that there are three Free Schools approved in the Borough, one of which has a site that has been purchased for it by the Education and Skills Funding Agency (ESFA). The Draft Plan also allocates other community provision to sites including health facilities and leisure centres. Although developers may be able to provide land or buildings for such provision, as Berkeley Group has done at Goodman's Fields for example for a health</p>	Yes		<p>Comment noted. Further work is being carried out with regards to schools which will determine the infrastructure requirements for site allocations.</p> <p>The Infrastructure Delivery Plan identifies the need for 5-6 new health facilities. This is reflected in the site allocations section, which allocates sites for 6 new health facilities and the re-provision of an existing specialist facility at Whitechapel as well as the re-provision of an existing health facility at Crossharbour.</p> <p>The Infrastructure Delivery Plan identifies the need for 1 new indoor leisure facilities. The local plan allocates land at Bishopsgate Goods Yard site for the new provision. It also allocates for the re-provision of the existing leisure facility at Westferry Printworks.</p>

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									centre, there is no guarantee such provision will always be taken up by providers. In order for the Plan to be effective (deliverable) it will be important for the Council to add some wording, either to the overarching policy (D.CF3) or the relevant site allocations, which allows flexibility in provision and the release of sites from Social Infrastructure requirements where there is no public take up or where up to date infrastructure planning demonstrates that sites are not required. This will allow Allocated Sites to make their full contribution to meeting housing need where social infrastructure is not required. This could include reference to the criteria in D.CF3 (3) as a means of considering the release as well as allocation of sites: the demand for school places in that location, deliverability of appropriate buildings at a reasonable cost, and air quality. Modifications to make sound Amend Policy D.CF3 and relevant site allocations to allow process of release where infrastructure not required Ensure sufficient flexibility and clarity in site allocations about requirements, reflected in reductions in other obligations where Council's own evidence suggests impacts on viability			
1033229	Paul Burley	Montagu Evans LLP	LP50	PART 3: POLICIES, 7.4 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Supporting Community, Cultural and Social Facilities Part 2 of this policy says that "Development will be required to contribute to the capacity, quality, usability and accessibility of existing community facilities, particularly where development will increase demand." Paragraph 7.9 the explains that: "Part 2 promotes opportunities to create new community facilities and expand or improve the capacity and accessibility of existing facilities, taking account of future projected community needs (as set out in the Infrastructure Delivery Plan). This will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded through the community infrastructure levy where this is identified on the Regulation 123 List." The Council's Regulation 123 List sets out the type of infrastructure that Tower Hamlets Council intends will be, or may, be wholly or partly funded by CIL including: • public education facilities; • community facilities and faith buildings; • leisure facilities such as sports facilities, libraries and Idea Stores; and • health facilities. We do not see why there is an additional proposed policy requirement to deliver community facilities – it would amount to 'double dipping'. Instead, the Council must ensure that CIL receipts are promptly distributed to organisations that have a responsibility to deliver	Yes		The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind"). In addition, the plan also specifies in paragraph 2.42 that financial contributions may be sought financially or 'in kind' – where the developer builds or directly provides the matters necessary to fulfil the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. However, financial contributions may be secured for reasonable fitting out and infrastructure costs and this is determined on a case-by-case basis. A minor modification has been proposed for clarification, accuracy and consistency and the following text in paragraph 7.9 of policy S.CF1 is moved to paragraph 7.10: Loss of sports facilities will only be justified where an applicant can provide a robust

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									community facilities, for example the National Health Service.			assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.
1142677	Crest Nicholson		LP586	PART 3: POLICIES, 7.5 Paragraph Policy S.CF1: Supporting community facilities	No	Consistent with national policy			Part 4 of Policy S.CF1: Supporting community facilities states that “new community facilities will be directed towards the borough’s centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal” In addition, Paragraph 7.11 of the explanatory text sets out that part 4 of the policy seeks to ensure that new facilities are located within or at the edge of town centres. This is contrary to paragraph 38 of the NPPF which does not restrict key facilities to town centres or edge of town centres. In particular it states that “new facilities will be directed towards locations which are accessible to their catchment areas”. In light of the explanatory text to the policy, it is understood that community facilities will be permitted when they are easily accessible to the expected catchment of the proposed facility. This should be clarified as the current policy wording is unclear. The proposed site allocation includes a D1 floorspace provision which is intended to offset the additional need for facilities generated by the development, as well as making a contribution towards the needs of the surrounding area. Whilst not located within one of the borough’s centres, Policy S.CF1 is considered to support the provision of community facilities at the site as it is within close proximity of the Roman Road West District centre and will therefore be accessible to the intended catchment of the facility.			Comment noted. Part 4 of policy S.CF1 states that new community facilities will be directed towards town centres or to locations which are accessible to their catchments. Town centres are the most accessible places in the borough and given that social infrastructure provides service to the community, it needs to be accessible to all users. Paragraph 38 of the NPPF states that key facilities should be located within walking distance of most properties where that is practical. Policy D.CF3 additionally enforces this approach by requiring an up-to-date and robust local need for new community facilities outside town centres. Community facilities have been proposed as part of site allocation where it has been demonstrated that a local need would be met.

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1143156	Hondo Enterprises	Hondo Enterprises	LP772	PART 3: POLICIES, 7.5 Paragraph Policy S.CF1: Supporting community facilities	Yes		The protection of existing community facilities through these policies is supported. The need for developments to contribute to the capacity, quality, usability and accessibility of existing community facilities where development will increase demand is accepted, however it should be accepted that this cannot always be delivered on site. It is acknowledged and supported that new community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposals. The principles within this policy are supported. The need for community facilities within wider developments to be accessible to people outside of the host development is accepted.					Comment noted.

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624580	Jason Larkin	Canary Wharf Group Plc	LP530	PART 3: POLICIES, 7.5 Paragraph Policy S.CF1: Supporting community facilities	No	Justified; Consistent with national policy			The draft policy is appears too dismissive of the role that CIL will play in the funding of community facilities. The Council's Regulation 123 List includes "Community facilities"; "Health and social care facilities; Leisure facilities such as sports facilities", "libraries and Idea Stores"; and "Public education facilities" as types of infrastructure to be funded by CIL. CIL should be the primary funding source of such facilities and only in exceptional circumstances, where specific to a development and where robustly justified by the Council, should other mechanisms be used to bring forward such infrastructure. The draft policy and supporting text should make this clear, consistent with Chapter 4: 'Infrastructure Delivery' of Part 5: 'Monitoring and Delivery' of the Draft Local Plan.			Policy D.SG5 and section 5 of the document specify the role of CIL and section 106 contributions in delivering the majority of the necessary infrastructure to support the planned growth in Tower Hamlets. Community facilities policies and site allocations infrastructure requirements specify the need for specific types of community facilities at particular locations. Paragraph 7.9 under policy S.CF1 also clarifies that provision of new community facilities will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded though the community infrastructure levy where this is identified on the Regulation 123 List.
790873	Sport England	Sport England	LP837	PART 3: POLICIES, 7.5 Paragraph Policy S.CF1: Supporting community facilities	No	Positively prepared; Justified; Consistent with national policy			Policy S.CF1: Supporting community facilities Policy S.CF1 broadly aligns with the 'protect' and 'enhance' elements of Sport England's policy, and therefore the NPPF, but does not adequately address 'provide'. However, even the 'protect' and 'enhance' aspects are weak for sport facilities which is a reflection of Sport England's concerns of amalgamating all community facilities within generic policies. It is not clear if this policy has been informed by the Indoor Sports Facility Strategy and PPA which, despite the concerns raised by these evidence base documents, raises questions whether the policy has been positively prepared. Sport England is concerned that Part 1 does not highlight the function of existing community facilities therefore, for instance, a sports facility could be lost to another community use. The NPPF is clear that a surplus must be identified before there is a loss facilities. Sport England does not consider that this policy would prevent such a change of use and therefore it is not consistent with the NPPF, paragraph 74. While development that increases demand should contribute to improving facilities that it would impact, the provision of new facilities or access to facilities should also be considered. Part 2, therefore, is too restrictive by limiting to any existing facility improvement. Robust strategies should direct and highlight what is needed and where. Sport England broadly supports Part 3 provided the location is clearly identified by robust need assessments and strategies. However, "maximising opportunities" is not considered strong and infers developments won't need to do this therefore it is recommended that this wording is amended to "Development should provide for the provision...." as this is more precise and stronger.	Yes		Comment noted. The council considers it is appropriate to amalgamate all community facilities within generic policies. These include a range of social infrastructure that provide services to the community and serve local needs. The policy clearly specifies that indoor sports and leisure facilities are one type of community facilities, which are protected against loss. Whilst policy S.CF1 clearly specifies that indoor sports and leisure facilities are one type of community facilities, their loss needs to be clearly justified in line with policy D.CF2 before any other community use can be considered in its place. Paragraph 7.14 indicates that where the loss of community facilities is justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in accordance with relevant strategies, including Indoor Sports Facilities Strategy, Open Space Strategy and Infrastructure Delivery Plan. The council has made an amendment by making minor modification to paragraph 7.14 to add the following wording to clarify that the loss of sports facilities as thus: Loss of sports facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus

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												<p>provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.</p> <p>In addition, an amendment has been made to paragraph 7.17 to add the following:</p> <p>Proposals to replace indoor sport facilities must be of at least equivalent function, quality and quantity and in a suitable location.</p>
635854	Barts Health NHS Trust		LP240	PART 3: POLICIES, 7.5 Paragraph Policy S.CF1: Supporting community facilities	No				Supporting Community, Cultural and Social Facilities Part 2 of this policy says that "Development will be required to contribute to the capacity, quality, usability and accessibility of existing community facilities, particularly where development will increase demand." Paragraph 7.9 the explains that: "Part 2 promotes opportunities to create new community facilities and expand or improve the capacity and accessibility of existing facilities, taking account of future projected community needs (as set out in the Infrastructure Delivery Plan). This will be achieved through the use of planning contributions and working together with partners to ensure adequate community facilities are in place to support the sustainable growth of the borough. Improvements to community facilities may also be funded though the community infrastructure levy where this is identified on the Regulation 123 List." The Council's Regulation 123 List sets out the type of infrastructure that Tower Hamlets Council intends will be, or may, be wholly or partly funded by CIL including: · public education facilities; · community facilities and faith buildings; · leisure facilities such as sports facilities, libraries and Idea Stores; and · health facilities. We do not see why there is an additional proposed policy requirement to deliver community facilities – it would amount to 'double dipping'. Instead, the Council must ensure that CIL receipts are promptly distributed to organisations that have a responsibility to deliver community facilities, for example the National Health Service.	Yes		The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind"). In addition, the plan also specifies in paragraph 2.42 that financial contributions may be sought financially or 'in kind' – where the developer builds or directly provides the matters necessary to fulfil the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. However, financial contributions may be secured for reasonable fitting out and infrastructure costs and this is determined on a case-by-case basis.
790873	Sport England	Sport England	LP842	PART 3: POLICIES, 7.6 Paragraph	No	Positively prepared; Effective; Consistent with national			Paragraph 7.6, which supports Policy S.CF1, lists community facilities which does not include outdoor or informal sports facilities or playing field and pitches. However, schools are mentioned which are likely to have such facilities. This further affirms Sport England's concerns about the limited weight, or indeed consideration, playing fields have been given within the Local Plan.	Yes		Paragraph 7.7 clarifies that playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are covered by policies S.OWS1 and D.OWS3.

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						policy						
790873	Sport England	Sport England	LP843	PART 3: POLICIES, 7.11 Paragraph	No	Positively prepared; Effective; Consistent with national policy			In relation to Part 4, while some community facilities would be best suited in town centres, this may not necessarily be where the demand is for sports facilities once considering current or planned future development. Paragraph 7.11 also does not reflect this point and appears to focus on vitality of central areas. The location of sports facilities should be based on where they are required to meet an identified need.	Yes		Part 4 of the policy states that new community facilities will be directed towards the borough's centres and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal. Areas within or at the edge of town centres are considered to be the most accessible places in the borough. As such, it is considered that new community facilities (indoor sports facilities) will be: <ul style="list-style-type: none"> • accessible to all users which aligns with principle 1 of the SE's Active Design, • within easy reach of each other which is in line with principle 2 of the SE's Active Design, • surrounded by mix of land uses which are available in town centres such as retail, community and associated uses. This is in accordance with principle 4 of the SE's Active Design that will support linked trips, • located within a prominent location which addresses principle 5 of the SE's Active Design. In addition, new facilities will be directed towards locations which are accessible to their catchment area. This will be assessed on a case-by-case basis and it means that facilities would be located where they meet an identified need. It is considered that the wording of the policy is effective so it ensures that new community facilities can be delivered in most suitable locations.
1033229	Paul Burley	Montagu Evans LLP	LP51	PART 3: POLICIES, 7.12 Paragraph	No	Effective			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Safeguarding Community Facilities Whilst we support the general aim of safeguarding community facilities, this policy should include the necessary flexibility to enable providers to work within other regulatory regimes. For example in relation to health services it could be that case that facilities are no longer required and therefore the land should be put to a more effective use; or that services are commissioned from another party and from other premises elsewhere. It should also be recognised that for organisations with large estates there may also be opportunities to rationalise the amount of space without compromising service delivery.	Yes		Part 1 (a and b) of policy D.CF2 specifies certain circumstances in which an existing community facilities can be replaced with another community use. The relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy and Infrastructure Delivery Plan would indicate an alternative community use that would better meet local needs.

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1054350	Frasers (Central House) Ltd		LP370	PART 3: POLICIES, 7.13 Paragraph Policy D.CF2: Existing community facilities	No	Positi vely prepa red; Justifi ed; Effect ive			Policy D.CF2 requires that development which results in the loss of any existing community facility must be retained unless it can be robustly demonstrated that there is no longer a need or that a new off-site location would better meet the needs of existing users. However the wording of the suggested policy D.CF2 is overly restrictive and risks preventing sites coming forward that could help to meet the employment floorspace requirements as detailed under the LBTH Employment Land Review. The requirement for a 'replacement facility of similar nature' does not take into account, for example, the wider training and development opportunities that could result from construction and operation of many uses, in lieu of a particular form of community use such as education. The Policy fails to recognise or even consider the benefits that can be delivered from alternative uses, in lieu of the replacement community facility. As such, it fails to realise opportunities for a site to deliver the maximum public benefits to the local community. Given the shortfall in meeting the London Plan target office floorspace of 1,384,250 sqm, the policy should recognise the benefits that development which would help to meet this shortfall and in turn, demonstrate that the plan has been proactively planned for growth. Safeguarding Community Facilities – Policy D.CF2 is neither justified nor effective. It fails to provide the flexibility to allow alternatives that could deliver increased benefits and assist the Council in meeting its targets over the plan period. In response to the above we would propose: 4 For Policy D.CF2 to acknowledge the benefits from other replacement uses that might be preferable to a replacement community facility and therefore be acceptable in policy terms.	Yes		Paragraph 70 of the NPPF requires planning policies and decisions to guard social infrastructure against the unnecessary loss. Policy D.CF2 clearly specifies that any loss of a community facility should be justified in line with part 1 (a and b). The approach to provide a replacement facility in accordance with relevant strategies, accords with current London Plan policy 3.16 which states that boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. This is also in line with part G of the draft London Plan policy S1.

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790873	Sport England	Sport England	LP844	PART 3: POLICIES, 7.13 Paragraph Policy D.CF2: Existing community facilities	No	Positively prepared; Effective; Consistent with national policy			Policy D.CF2 Existing Community Facilities Policy D.CF2 appears at odds with Policy S.CF1 to some extent as the latter states existing facilities would be protected but Policy D.CF2 states such facilities should be 'retained' unless certain criteria is met. The approach of Policy D.CF2 is inconsistency with national planning policy (paragraph 74 of the NPPF) which advocates the loss of sports facilities only when a surplus is identified not a lack of need. Sport England considers a lack of need is a lower threshold than an identified surplus. The surplus must be identified by a robust strategy for any decision on loss to stand up to challenge. Parts 1b) and 2 are also at odds with the NPPF as the replacement must be of at least equivalent function, quality, quantity and in a suitable location and not merely a 'similar nature' or just quality and accessibility as currently stated by the policy. Furthermore, the PPA highlights playing field deficits therefore there should be no loss or partial loss of school playing field. Part 3 suggests that there can be playing field loss if the school needs an extension, which again is contrary to the NPPF, paragraph 74. Sport England suggest that any extension does not result in full or partial playing field loss unless it meets the provisions of paragraph 74 or Sport England's Playing Field Policy which can be found at https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/	Yes		Comment noted. Policies seek to protect existing community facilities, however, it is considered that appropriate degree of flexibility has been given to consider their replacement with another community facility should their loss be justified. As such, policies are considered sound. The following wording has been added to paragraph 7.14 to comply with paragraph 73 of the NPPF: Loss of sports facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport facility that better meets the needs of the community. Additionally, the following sentence has been added to paragraph 7.17 to incorporate the requirements from paragraph 74 of the NPPF: Proposals to replace indoor sport facilities must be of at least equivalent function, quality and quantity and in a suitable location.
1053510	Zeloof LLP and Truman Estates Limit		LP715	PART 3: POLICIES, 7.13 Paragraph Policy D.CF2: Existing community facilities	No				8. Draft Policy D.CF2 'Existing Community Facilities' 8.1. The draft policy should include flexibility to ensure that the borough's designated town centres are vibrant and commercially successful places.	Yes		Comment noted. Chapter 6 promotes town centres as vibrant and sustainable places continuing to meet the needs of the people that use them.
635854	Barts Health NHS Trust		LP241	PART 3: POLICIES, 7.13 Paragraph Policy D.CF2: Existing community facilities	No				D.CF2: Safeguarding Community Facilities Whilst we support the general aim of safeguarding community facilities, this policy should include the necessary flexibility to enable providers to work within other regulatory regimes. For example in relation to health services it could be that case that facilities are no longer required and therefore the land should be put to a more effective use; or that services are commissioned from another party and from other premises elsewhere. It should also be recognised that for organisations with large estates there may also be opportunities to rationalise the amount of space without compromising service delivery.	Yes		Part 1 of policy D.CF2 specifies the circumstances under which existing community facilities can be replaced to ensure that they meet the needs of local communities and existing users. Further information is provided in paragraph 7.14 which requires statements from relevant providers to be submitted for any loss of the borough's valuable community facilities.

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1141890	Amanda Day		LP22	PART 3: POLICIES, 7.15 Paragraph	No	Positi vely prepa red			In its Indoor Sports Facilities Strategy published earlier this year the Council stated the following about St George's Pools:"7. The council should investigate either: • The retention/refurbishment of the St George's Pool, with the addition of a sports hall, with an option for housing development on the site". This is in contrast to the wording of of paragraph 7.15. At present the main pool at St George's 33m in length. Any new pool will be 25 metres so it will not match what is already existing. In addition, the Indoor Sports strategy stated that the overall condition grading of the facility was B, satisfactory. Also in its strategy it states that St George's is difficult to segregate for single sex sessions, which is simply not true. Demand for swimming, according to Sport England is expected to rise to 4,398m2, equivalent to 13 pools by 2026. There are currently 5 Council-owned pools. In its review, the Council is recommending just 2 new pools, one a smaller replacement for St George's. In its wording, the Council states "re-provision of the community facility should demonstrate that quantity is at least kept at the same level as the existing facility and the aim should be to increase it."The Indoor Sports Facilities policy upon which the Council is basing its evidence, does not allow for this.			Comment noted. As specified in the Indoor Sports Facilities Strategy and the Infrastructure Delivery Plan, the council should investigate either: •The retention/refurbishment of the St George's Pool, with the addition of a sports hall, with an option for housing development on the site, or; •The addition of new facilities at John Orwell Leisure Centre, including a swimming pool, of high design quality, to replace any lost provision at St George's and new facilities such as 5-a-side playing pitches. St George's could then be redeveloped to help fund the new facilities.
790873	Sport England	Sport England	LP847	PART 3: POLICIES, 7.17 Paragraph	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			In relation to the supporting text, Sport England welcomes the reference in paragraph 7.17 to its guidance but it is not entirely clear which guidance the Council would like to direct developers to in this instance. Sport England, therefore, are unable to determine if the reference to its guidance is appropriate.	Yes		The relevant guidance is referenced under "Evidence Links" - Active Design (Sport England, 2015)
1137737	Andrea Deards		LP9	PART 3: POLICIES, 7.18 Paragraph Policy D.CF3: New and enhanced community facilities	No	Effect ive			explanation for D.CF3 is good i.e. encouraging community facilities towards town centres but the way the policy is worded appears unduly restrictive and to actively discourage any community facilities unless they are in the centre and very heavily justified-these things are already required through SCF1 which already requires accessibility. We would welcome community facilities throughout the Isle of Dogs.	Yes		The policy promotes the provision of community facilities at accessible locations such as town centres. This is in line with the principles set out in Sport England's Guidance Active Design which recommends that facilities are accessible to all users, within easy reach of each other, surrounded by mix of land uses to promote linked trips and located within prominent locations. Furthermore, location of community facilities within town centres would contribute to the vitality and viability of town centres which is in line with policies S.TC1 and S.SG1 . However, policy provides degree of flexibility which allows for community facilities to be located outside the borough's town centres where an up-to-date and robust evidence can demonstrate

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												that the local need can be met elsewhere, i.e. outside town centres. Detailed information is provided in paragraph 7.19.
1142677	Crest Nicholson		LP587	PART 3: POLICIES, 7.18 Paragraph Policy D.CF3: New and enhanced community facilities	No	Consistent with national policy			Policy D.CF3: New and enhanced community facilities is in six parts. Part 1 states that “new community facilities located outside of the borough’s town centres will only be permitted where an up-to-date and robust local need can be demonstrated”. It is considered that Part 1 of Policy D.CF3 does not conform with Policy S.CF1 (see paragraph 4.14). Policy S.CF1 provides more flexibility for community facilities outside of the boroughs centres, where they are within the facilities’ proposed catchment. Policy D.CF3 does not provide this flexibility, but instead requires a needs assessment to support facilities not within a borough’s centre. The explanatory text to part 1 of Policy D.CF3 contained within paragraph 7.19 suggests that the delivery of new facilities is directed towards accessible locations such as town centres. Given that the requirement for facilities to be located in town centres is borne out of a need for them to be accessible rather than any identified need for community facilities in town centres (no studies into this have been produced in support of the local plan in the evidence base) it is considered that Policy D.CF3 should also allow for the provision of facilities which are accessible to their catchment in accordance with Policy S.CF1, without a further requirement for a needs assessment. This is considered particularly relevant where facilities are proposed to support, entirely or in part, the need generated by a development, as would be the case with the proposed site. Part 2 of Policy D.CF3 states that “new community facilities within larger developments should be easily accessible to people who live and work outside of the host development”. The explanatory text to part two of the policy contained in paragraph 7.20 states that “Part 2 aims to ensure that new community facilities which form part of a wider development are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of the development. Consideration should be given to ensuring that the facility can be easily accessible to a wide range of users”. Part 2 of Policy D.CF3 therefore supports the provision of community facilities within larger developments, further highlighting the non-conformity of part 1 of Policy D.CF3 with the aims of the policy or other policies contained within the Plan, notably Policy S.CF1. In summary, while the overall aims of policies S.CF1 and D.CF3 of supporting and providing community facilities are supported, it is considered that further clarification of the policies is required and amendments to part 1 of Policy D.CF3			Comment noted. Part 1 of policy D.CF3 has been amended by making minor modification as thus: New community facilities located outside the borough's town centres will only be permitted where an up-to-date and robust local need can be demonstrated. By removing the word 'only', policy D.CF3 is consistent with other policies contained within the emerging Local Plan.

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									are necessary in order for it to conform with other policies contained within the emerging Local Plan. The proposed site allocation would accord with the intentions of policies S.CF1 and D.CF3 as it would deliver additional D1 use floorspace within close proximity of an identified centre, which is easily accessible to its proposed catchment. This would serve the need generated by the development as well as the wider community. Consequently there is a further community benefit to allocating the site in addition to the benefit of the provision of circa 350 high quality residential units.			
790873	Sport England	Sport England	LP848	PART 3: POLICIES, 7.18 Paragraph Policy D.CF3: New and enhanced community facilities	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			Policy D.CF3: New and enhanced community facilities Policy D.CF3 does state that new facilities can be located outside central areas "where an up-to-date and robust local need can be demonstrated" which contradicts to some extent with earlier policies although Sport England does welcome the acknowledgment of a need based location. This should be the case for all new provision. Parts 3 and 5 refers to Sport England guidance but it is not clear which guidance so Sport England are unable to comment whether the reference here is appropriate, especially since Part 3 refers to school facilities. For instance, is it Sports Hall Design Guidance, Use our School or another? As indicated above the requirement of Part 6 to direct facilities where needed is welcomed albeit the Council does not have a robust strategy that sets out what large facilities are required Generally, Policy D.CF3 feels more aimed at schools with little acknowledgment of playing field. It is noted there is limited reference to sports facilities. There is no reference to particular facilities, such as sports halls, swimming pools etc. and particular sites. There is also no mention of enhancing facilities despite the policy name. The Local Plan would therefore have limited effectiveness of planning for new and enhanced facilities when there is no strategy directing what is needed, where and when it should be delivered. The Council should revisit the strategies and undergo a robust development of them with stakeholders following an agreed methodology.	Yes		Town centre locations are considered appropriate and in line with Sport England's Active Design Guidance. However, as stated in the policy, facilities will be directed outside the borough's town centres where there is a local need. The relevant guidance is Sport England's Planning for Sport Development Management. The Indoor Sports Facilities Strategy includes assessment of the borough's indoor sports facilities and specific strategic options and objectives. The Infrastructure Delivery Plan is a key document supporting the Local Plan. It provides an assessment of the current supply and future need for leisure facilities, indoor sport facilities and outdoor sport facilities and playing pitches and identifies specific projects to help address this need. Enhancement of community facilities could also include the expansion of existing community facilities which means that the same criteria should be used as per delivery of new community facilities.
1142493		Berkeley Group	LP416	PART 3: POLICIES, 7.18 Paragraph Policy D.CF3: New and enhanced community facilities	No				D.CF3: New and enhanced community facilities The Council has deliberately 'over-allocated' secondary school sites. This policy and site allocation policies should allow for sites to be released according to appropriate criteria. Part 3c is too general given flexibility within that guidance and is any case required (outside the planning system) to be considered for new schools Soundness test: Revise to make deliverable and therefore effective	Yes		Further work is being carried out with regards to schools which will determine the infrastructure requirements for site allocations.

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1053884		Queen Mary University of London	LP666	PART 3: POLICIES, 7.18 Paragraph Policy D.CF3: New and enhanced community facilities	No	Positively prepared			Higher Education On the basis that Policy CF4 (Schools and Lifetime Learning) has now been removed from the plan there is no longer a specific policy on higher education. Given the importance of the University and its growth to the Borough, London and UK as a whole, this policy should be reinstated or incorporated fully into D.CF3 (New and Enhanced Community Facilities) to ensure that the expansion of higher education facilities are supported especially where they are within existing campuses, near to existing educational facilities or in highly accessible locations. Currently the plan is not positively prepared in terms of meeting the needs of all development requirements as it does not sufficiently recognise the growth aspirations of QMUL across their two campuses. In addition, clarity is sought regarding Part 5 of Policy D.CF3 which states that higher education facilities will need to provide the relevant clarification from the Department of Education. QMUL like all Universities is not subject to governance by the DoE so QMUL would request detailed information outlining what would be required as a result of the policy.	Yes		The requirements for higher education are incorporated in the community facilities policies. This is considered appropriate given that community facilities are defined in policy S.CF1 as a range of social infrastructure that provide services to the community. Policy D.CF3 ensures that expansion of existing and delivery of new community facilities including higher educational facilities are permitted in town centres which are highly accessible locations or where an up-to-date and robust local assessment can demonstrate that these can be delivered outside town centres which can include existing campuses and locations near existing educational facilities. The growth aspirations of QMUL are reflected in sections 1, 3 and 4 of the Local Plan.
790873	Sport England	Sport England	LP849	PART 3: POLICIES, 7.24 Paragraph	No	Positively prepared; Effective; Consistent with national policy			Paragraph 7.24 should refer to Sport England guidance rather than principals.	Yes		Comment noted. Changes to paragraph 7.24 include the removal of 'the principles set out in' by making minor modification as thus: Further and higher education (see part 5) refers to the stage of education after secondary school and includes a wide range of institutions including universities and colleges (as defined in the glossary in appendix 1) which provide lifelong learning. It is noted that some further education colleges do include sixth form provision. In order to meet these requirements, the applicant will need to provide evidence of the relevant certification from the Department for Education as well as details of student and staff numbers, enrolment criteria and curriculum details. Sport and recreation facilities within schools should also reflect the principles set out in Sport England and other relevant national governing body guidance.
1142656	Rabina Khan		LP538	PART 3: POLICIES, 7.26 Paragraph Policy D.CF4: Public Houses	No	Positively prepared; Justified; Effective			Many of the pubs are struggling for business due to demographic change and possibly health. This could potentially force landlords of pubs to sell their properties i.e. to developers where more space for housing is required. However, there is much control over the selling of pubs which are part of the rich history of the East End.			Comment noted.

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1053510	Zeloof LLP and Truman Estates Limit		LP717	PART 3: POLICIES, 7.26 Paragraph Policy D.CF4: Public Houses	No				9. Draft Policy D.CF4: 'Public Houses' 9.1. The draft policy should include flexibility to ensure that the borough's designated town centres are vibrant and commercially successful places. Note: soundness test not undertaken.	Yes		Comment noted. Chapter 6 promotes town centres as vibrant and sustainable places continuing to meet the needs of the people that use them.
635797	Greater London Authority		LP680	PART 3: POLICIES, 7.26 Paragraph Policy D.CF4: Public Houses	N/A			As stated in my previous letter, the Mayor is keen to develop the night time economy in appropriate locations. In this regard, the Mayor supports policy D.CF4 which aims to protect public houses. Tower Hamlets is encouraged to take into account emerging research from the Mayor's Cultural Infrastructure Plan to support its evidence base, including research on pubs, grassroots music venues and LGBT+ venues and to take into account 'From Good Night to Great Night', the Mayor's vision for London as a 24-hour city as part of its evidence base for revitalising its town centres and delivering economic growth.			Comment noted.	
1142844	Ahmed Hussain	Alpha Grove Freehold ers Associati on	LP661	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No				Green and open space: While the 'greening of facades' is welcomed, there is no policy that provides any specific guidance and is inadequate given the density and scale of development It also fails to ensure that the green and open space will be equally spread out within the borough and not only in one part only i.e. stacking up a high dense of population in one area i.e. the IoD and having all the green space in the other; the greenery and open space policy should be evenly spread throughout the borough, currently we are under the per hectare green space and moving into dangerous territory; this should be addressed in the new local plan Note: no soundness test undertaken	Yes		Local Plan policies along with the Open Space Strategy and Green Grid Strategy seek to protect, create and enhance open spaces throughout the borough with significant focus of delivering new publicly accessible open spaces in areas of identified deficiency of access to publicly accessible open space.

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1141900	Gregory Brackett		LP13	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No	Consistent with national policy			Amend the proposals map to exclude the Canal Cottages site from the MOL designation as shown on plan sent by email. We are instructed by Gregory Brackett, as a representative of the owners and residents of properties and land within the Canal Cottages site, including: Gregory Brackett (Land Adjacent to No 1), Hazel White (No 2), Adam Dewhurst & Colleen Murphy (No 3 & Canal Operations Office), Tim Walker (No 4), to provide the following response to the London Borough of Tower Hamlets Draft Local Plan. The site, including nos. 1-4 Canal Cottages and the land adjacent, is hereon referred to as the Canal Cottages site. Please find attached a copy of the site plan. Our clients are concerned that there is no proposal to alter the Metropolitan Open Land (MOL) designation to remove the Canal Cottages site, and therefore considers that the plan is unsound as it is not positively prepared, justified nor consistent with National Policy and the London Plan. As relevant background information, the Canal Cottages site is currently partially within designated Metropolitan Open Land (MOL) and comprises an area of approximately 0.16 ha. The site is situated alongside Victoria Park in east London, adjacent to Hertford Union Canal to the south. The site is distinctly separate from the park of which it is adjacent and comprises four privately owned houses and adjacent land. The site is situated within the Victoria Park Conservation Area and the adjacent Victoria Park itself is a grade II* listed park. No. 3 Canal Cottages comprises a Grade II listed early 19th century cottage. To the south of the site is the Hertford Union Canal and the 'Top Lock', a grade II listed lock. The southern fringes of the land adjacent to no. 1 Canal Cottages appears to fall within a Site of Importance for Nature Conservation (SINC) designation. The draft Local Plan Policies Map shows the retention of the Metropolitan Open Land (MOL) designation across Victoria Park, and also across the row of cottages and adjacent land in the Canal Cottages site. Our clients support the retention of the MOL designation across Victoria Park. However, they strongly object to the designation of the Canal Cottages site as MOL. Indeed, there a number of reasons which suggest that the Canal Cottages site should be removed from its MOL designation, as discussed below. The London Plan states that alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process. It gives guidance to local authorities when designating MOL, and the policy and supporting text states: "To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria: a it contributes to the physical structure of London by being clearly distinguishable from the built up area b it includes open air facilities, especially for	Yes		Considering the high level of open space deficiency in the borough, no re-assessment of the MOL boundaries have been undertaken. London Plan policy 7.17 sets out strong support for the current extent of MOL, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. It seeks to protect the MOL from inappropriate development, except in very special circumstances, giving the same level of protection as with Green Belt designation. The MOL designation in Tower Hamlets is long established and clearly identified on previous and current plans. The council's approach to protect and seek to enhance all open spaces, including MOL, is considered to be in line with national and regional planning policy and is also justified by the significant level of open space deficiency in the borough.

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									<p>leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London c it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value d it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. 7.56 The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and quality of life. Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate. Appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Green chains are important to London’s open space network, recreation and biodiversity. They consist of footpaths and the open spaces that they link, which are accessible to the public. The open spaces and links within a Green Chain should be designated as MOL due to their London-wide importance.” Taking each of these criteria in turn, in respect of criterion A, the Canal Cottages site is not clearly distinguishable from the built-up area. The site includes four dwellings which are situated in close proximity to the existing built-up area, in particular the properties at Parnell Road and appears as a continuation of this development. Indeed, access to the site is taken from Parnell Road, adjacent to the site. The canal acts as the only separation of the site from the built-up area. Although situated adjacent to Victoria Park, the site is clearly distinct and separate to it. It is bound by mature trees to its north-eastern, north-western and south-western edges, clearly separating it from the Park. Furthermore, land adjacent to no. 1 is fully enclosed by a 7’ high brick and timber wall and as such is fully screened from views from the park, canal, towpath and any public way. These boundaries, together with the site’s location in close proximity and relationship to the built-up area, maintains its separation from the publically accessible Victoria Park, which is designated as MOL. As such, unlike the Park itself, the site is not clearly distinguishable from the built-up area and as such does not contribute to the physical structure of London. The Canal Cottages site does not meet criterion B, which seeks open air facilities which serve significant parts of London, by nature of its private residential use and lack of public access. Indeed, it is clearly not included in the ‘publically accessible open space’ as identified on Tower Hamlets’ policies map</p>			

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									<p>and is entirely private land. Land adjacent to no. 1 Canal Cottages is also enclosed by a high wall, providing no use or benefit to members of the public. With regard to criterion C, whilst Victoria Park contains features and landscapes of national and metropolitan value, including historic features, recreation and biodiversity, the Canal Cottages site comprises a very different character and appearance dominated by the private residences it contains. In terms of landscapes of national or metropolitan value, the Canal Cottages site itself is separated from Victoria Park and largely screened from view on its north-eastern, north-western and south-western edges as set out above, including the land adjacent to no. 1 which is fully screened from view by a 7' high wall which encloses it. As such, the site clearly remains isolated and separate from Victoria Park and there is little contribution of the site to the value of the wider open landscape of the Park. Furthermore, there is little value in the view of the properties from the front in this wider park landscape, given that they appear urban in character. In terms of features of national or metropolitan value, the Canal Cottages site contains a listed building at no. 3. However, this is protected by means of its statutory listing and should not merit the site being designated MOL. The southern fringes of the site, specifically at land adjacent to no. 1, appears to fall within the wider Site of Importance for Nature Conservation (SINC) site (the canal bank). However, the area contained within the site is minimal and given that the majority of the site falls outside of this designation, this should not warrant grounds for the inclusion of the site, or majority of it, in the MOL designation. In respect of criterion D, the Canal Cottages site does not form part of any designated Green Chain. The NPPF defines green infrastructure as: "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities." Whilst Victoria Park comprises green infrastructure, the Canal Cottages site itself is outside the Park and does not deliver quality of life benefits for local communities as it comprises private residences and land which are not accessible to the public. As such it differs in character and function to Victoria Park. The southern fringes of land adjacent to no. 1 Canal Cottages appears to fall within the Site of Importance for Nature Conservation (SINC) designation. However, it is clear that this designation primarily relates to the canal, and the Canal Cottages site itself provides little in terms of environmental benefits for local communities. Given the site's location alongside Victoria Park, the remainder of which does comprise green infrastructure and is of a substantial scale, and for the reasons set out above,</p>			

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1141900	Gregory Brackett		LP14	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No	Consistent with national policy			Amend the proposals map to exclude the Canal Cottages site from the MOL designation as shown on plan sent by email. We are instructed by Gregory Brackett, as a representative of the owners and residents of properties and land within the Canal Cottages site, including: Gregory Brackett (Land Adjacent to No 1), Hazel White (No 2), Adam Dewhurst & Colleen Murphy (No 3 & Canal Operations Office), Tim Walker (No 4), to provide the following response to the London Borough of Tower Hamlets Draft Local Plan. The site, including nos. 1-4 Canal Cottages and the land adjacent, is hereon referred to as the Canal Cottages site. Please find attached a copy of the site plan. Our clients are concerned that there is no proposal to alter the Metropolitan Open Land (MOL) designation to remove the Canal Cottages site, and therefore considers that the plan is unsound as it is not positively prepared, justified nor consistent with National Policy and the London Plan. As relevant background information, the Canal Cottages site is currently partially within designated Metropolitan Open Land (MOL) and comprises an area of approximately 0.16 ha. The site is situated alongside Victoria Park in east London, adjacent to Hertford Union Canal to the south. The site is distinctly separate from the park of which it is adjacent and comprises four privately owned houses and adjacent land. The site is situated within the Victoria Park Conservation Area and the adjacent Victoria Park itself is a grade II* listed park. No. 3 Canal Cottages comprises a Grade II listed early 19th century cottage. To the south of the site is the Hertford Union Canal and the 'Top Lock', a grade II listed lock. The southern fringes of the land adjacent to no. 1 Canal Cottages appears to fall within a Site of Importance for Nature Conservation (SINC) designation. The draft Local Plan Policies Map shows the retention of the Metropolitan Open Land (MOL) designation across Victoria Park, and also across the row of cottages and adjacent land in the Canal Cottages site. Our clients support the retention of the MOL designation across Victoria Park. However, they strongly object to the designation of the Canal Cottages site as MOL. Indeed, there a number of reasons which suggest that the Canal Cottages site should be removed from its MOL designation, as discussed below. The London Plan states that alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process. It gives guidance to local authorities when designating MOL, and the policy and supporting text states: "To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria: a it contributes to the physical structure of London by being clearly distinguishable from the built up area b it includes open air facilities, especially for	Yes		Considering the high level of open space deficiency in the borough, no re-assessment of the MOL boundaries has been undertaken. London Plan policy 7.17 sets out strong support for the current extent of MOL, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL. It seeks to protect the MOL from inappropriate development, except in very special circumstances, giving the same level of protection as with Green Belt designation. The MOL designation in Tower Hamlets is long established and clearly identified on previous and current plans. The council's approach to protect and seek to enhance all open spaces, including MOL, is considered to be in line with national and regional planning policy and is also justified by the significant level of open space deficiency in the borough.

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1053309	Jane Wilkin	Environment Agency	LP264	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No				NOTE THAT THE EA DO NOT CONSIDER THE PLAN TO BE UNSOUND BUT HAVE MADE THE FOLLOWING OCMMENTS IN RELATION TO POLICIES OWS.1-OWS.4: We are pleased to see that there is now a greater recognition of the importance of the Blue Ribbon Network for biodiversity and the role it has to play in the provision of a network of green spaces within these policies. Additionally a description has been provided to make it clearer what is covered by the term “water spaces”. The Thames River Basin Management Plan and the Water Framework Directive have also been referenced in various parts of the plan so we are satisfied that this is sufficiently covered. Although the minimum has been covered in terms of biodiversity it is disappointing that there is not a greater emphasis particularly in policy S.OWS2 or D.OWS4 for improvements to watercourses to include the softening/naturalising of hard banks wherever possible. Additionally, although policy DES4 includes specific minimum set back distance this is only in relation to flood risk and not biodiversity. However we are satisfied that the policies signpost to one another.	Yes		Comment noted. Paragraph 8.31 makes reference to the protection and improvements of the river's natural environments. Furthermore, policies S.ES1 and D.ES3 require developments to protect and enhance biodiversity and contribute to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.

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1105881	Michael Atkins	Port of London Authority	LP380	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No				26. Tower Hamlets Water Space Study In the Tower Hamlets Water Space Strategy, published under the evidence base documents supporting the Local Plan, the PLA note that the study on page 61 states that a more detailed strategy should be developed for water spaces in the borough, where significant change and development is anticipated. Are there any timescales for this piece of work? The PLA would welcome involvement in the development of this strategy, particularly concerning the River Thames and River Lea.			Comment noted. The Tower Hamlets Water Space Study (2017) makes a number of site-specific recommendations concerning the water spaces that offer the greatest opportunity for enhancement which are embedded in the Local Plan. Furthermore, funding for the enhanced water spaces should be provided through developers contributions under Section 106 of the Town and Country Planning Act 1990.
790873	Sport England	Sport England	LP833	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			Sport England has reviewed the Regulation 19 submission and does not consider that it has been positively prepared, effective and consistent with national policy (namely the National Planning Policy Framework, paragraphs 17, 73 and 74). Sport England does not consider that the Council have developed a robust evidence base to inform the Local Plan therefore the Local Plan is considered to inadequately positively plan for sport and recreation to meet the London Borough of Tower Hamlet's current and future sporting need. This undermines the success the Council would have in addressing the health inequality and inactively issues expressed in the Local Plan and the ability to achieve its key objectives. In consequence, Sport England object to the Regulation 19 Local Plan as it is not sound. Overall, Sport England objects to the Local Plan Regulation 19 submission as it has an insufficient evidence base and strategy for sport, leisure and recreation that would not be effective in addressing the health and wellbeing needs of the current and future community. In addition, policies are not considered in line with Sport England Policy or the NPPF and could result in sport, leisure and recreation to be inadequately planned. As a result, for reasons highlighted in this submission, Sport England does not consider that the Local Plan is positively prepared, effective in delivering the sport and leisure needs of the community and consistent with national policy and is therefore unsound.	Yes		<p>The Open Space Strategy sets out where strategic open space will be provided across the borough and includes an assessment of the borough's playing pitches and outdoor sports facilities following Sport England's Playing Pitch Strategy Guidance.</p> <p>The Indoor Sports Facilities Strategy includes assessment of the borough's indoor sports facilities. With consideration to the significant level of overall open space deficiency in Tower Hamlets and the competing demands on the borough's open spaces (including playing pitches), the Open Space Strategy brings together considerations for open space more generally and outdoor sports facilities specifically in one strategic document.</p> <p>Additional information has been provided in the Playing Pitches Assessment (2017) and Playing Pitches: Options for Future Investment (2018) which set out a supply and demand assessment of playing pitch facilities in accordance with Sport England's Playing Pitch Strategy Guidance. Bringing these aspects together allows different demands on limited open space to be balanced more effectively in a high density borough.</p> <p>In addition and based on these strategies, the Infrastructure Delivery Plan is a key document supporting the Local Plan. It provides an assessment of the current supply and future need for indoor sport facilities and outdoor sport facilities and playing pitches (included in the open space sections of the document) and identifies specific projects to help address this need.</p> <p>On this basis, it is considered that the plan provides an adequate framework for sustainable planning for indoor and outdoor</p>

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												sport facilities, including playing field.

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1142493		Berkeley Group	LP365	PART 3: POLICIES, Chapter 8: Enhancing open spaces and water spaces	No	Justified; Effective; Consistent with national policy			Justified: No, infrastructure planning has not fully tested options Effective: No, over-allocation without flexibility leaves potential for parts of sites to be blighted by unnecessary infrastructure allocations Consistent with national policy: No, combined weight of obligations not consistent with para 173 of the NPPF Chapter 8, and policies S.OWS1 and D.OSW3 set out policies in relation to Open Space and Green Grid Networks. Policy DOWS3 (2) sets out criteria for strategic development meeting open space needs. Berkeley Group developments are already contributing to meeting open space needs at Goodman's Fields, London Dock and South Quay. The three Gasworks sites also all have allocations. Berkeley Group is committed to providing high quality spaces and has delivered or will deliver significant open space and public realm on all its sites. It needs to be recognised that there are potentially conflicts between some of the criteria in Policy D.OSW3 and the site specific allocations, and that the allocations themselves can have significant impacts on viability. It would be useful if the Plan could clarify that the nature of the site-specific provision needs to reflect the design constraints and context of those sites and that policy DOWS3 (2) should be read in that context. These allocations will impact on the ability of sites to deliver other obligations, notably new homes including affordable homes, particularly where they have other allocations including for secondary schools. The site specific representations for the Gasworks sites and London Dock will deal in more detail with these issues. Modifications to make sound Ensure sufficient flexibility and clarity in site allocations about requirements, reflected in reductions in other obligations where Council's own evidence suggests impacts on viability	Yes		Local Plan policies provide a strategic approach to address delivery and enhancement of open spaces in the borough and specify strategic requirements for the delivery of new publically accessible open spaces. Site allocations provide additional details for the site specific development principles, and as such, they do not replace other policies within the Local Plan. Local Plan policies have been subject to viability assessment to ensure that policy requirements do not result in such a policy burdens that their ability to be developed viably is threatened. Significant levels of open space deficiency in the borough coupled with development pressure and the need to secure other supporting infrastructure has dictated the need for development to contribute to the delivery of publicly accessible open spaces on site. The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind").
790873	Sport England	Sport England	LP851	PART 3: POLICIES, 8.1 Paragraph	No	Positively prepared; Effective; Consistent with national policy			Although introductory text, paragraph 8.1 does not recognise that open space, which includes playing fields, provides sport opportunities. Sport England recommend that the importance of sport in open space, which if is playing field is protected by national planning policy, is recognised within this paragraph. This would set out the importance sport will have in combating the health issues identified at the beginning of the Local Plan. It is welcomed that footnote 49, recognises the deficit of playing pitches although this was established in the PPA. The Open Space Strategy fails to set out what pitches are required, where they are required and when they should be delivered and does not highlight what type of improvements are required to the existing playing pitches and playing fields to meet current and future demand.	Yes		Comment noted. Reference to the important role of open space to provide sport opportunities has been added to paragraph 8.1 as thus: Tower Hamlets has a number of valued open spaces and water spaces which offer many important social, environmental and economic benefits, including: <ul style="list-style-type: none"> • enhancing amenity; • contributing to healthy lifestyles through providing opportunities for active travel and leisure; • providing sport and recreation opportunities;... The Playing Pitch Assessment (2017) and Playing Pitches: Options for Future Investment (2018) provide additional

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												specific information regarding playing pitches and fields in the borough.
1053788	Steve Craddock	The Canal & River Trust	LP360	PART 3: POLICIES, 8.1 Paragraph	N/A			We have submitted separate representations forms that explain why we consider policies OSW1, OSW2 and OSW4 to be unsound and set out changes that we consider should be made to rectify this. We are keen to continue to work with the Council to deliver active waterspaces in the borough, that are in keeping with their historic character and are valued by the local communities as spaces that support improved wellbeing.				Comment noted.
1142656	Rabina Khan		LP544	PART 3: POLICIES, 8.2 Paragraph	Yes		The plan acknowledges the importance of green space and falling short of the target. There is an indication of where there is a deficiency of green/open space and the enhancement and introduction of additional space is aspired to be met by developments. However, considering the above sections, if there are no developments, there would be no enhancements or new green space. This would mean making it easier for developers to build i.e. being more flexible rather than being too prescriptive. This could prevent development. The plan seeks to address air pollution but to address such issues the mechanism for local development delivery needs to					Local Plan policies have been subject to viability assessment to ensure that policy requirements do not impact on deliverability.

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							be far more sound and robust to bring about these changes.					
624580	Jason Larkin	Canary Wharf Group Plc	LP532	PART 3: POLICIES, Figure 13 : An enhanced network of open spaces and water spaces	No	Justified			Figure 13: 'An enhanced network of open spaces and waterspaces' shows on the North Quay site a 'New pedestrian footbridge required to deliver the green grid'. The proposed North Quay development will significantly enhance the pedestrian route between Canary Wharf and South Poplar, providing a direct link from Poplar High Street to the Canary Wharf Crossrail Station. The proposals will also enhance the green grid through planting along the route. However, the proposals utilise the existing pedestrian footbridge that crosses Aspen Way which is fit for purpose and of sufficient size to accommodate the additional movements generated by the North Quay proposals. As part of the determination of the planning application, neither TfL or the Council are requesting that the bridge be replaced. The replacement of the bridge would generate an additional, unnecessary cost which would have an adverse impact on the viability of the scheme. We have sought to understand the evidence to justify the request for a new pedestrian footbridge. The 'Tower Hamlets Green Grid Strategy: Update 2017' describes in para. 1.36 of the Appendices the 'Poplar DLR Station Link' which states: "Highlighted in the 2010 Strategy, the pedestrian environment linking Poplar DLR station and Poplar High Street is a significant transport node on the Green Grid. This space also links to valuable community facilities including Poplar Park, Tower Hamlets College and the adjoining Workhouse Leisure Centre. Improvements to the public realm through greening facades, provision of planters and seating would make a significant contribution to the enhancing the pedestrian experience of this important Green Grid link. Improvements here would coincide nicely with improvements being carried out on the Poplar station link by Canary Wharf Group." The North Quay proposals are making improvements to the public realm to significantly enhance the pedestrian experience of the Poplar link. There is however no description in the document of a new pedestrian footbridge being required from North Quay to South Poplar. Reference is made in para. 1.38 of the Appendices to a new footbridge linking the Billingsgate Market and Aspen Way Site Allocations. If this is the Council's intention then Figure 13 should be updated accordingly to move the location of the new footbridge from the North Quay to the Billingsgate Market site. We would also point out that in Appendix 3 (Green Grid Strategic Project Summary Matrices) of the Tower Hamlets Green Grid Strategy: Update 2017,			The diagrams are only indicative and give a broad indication of the open space provision in the borough. Detailed boundaries will be detailed through the development management process. The positioning of the new footbridge on figure 13 has been amended by making a minor modification to show the proposed new pedestrian foot bridge linking Billingsgate Market and Aspen Way Site Allocations. It should be noted that the design principles for the North Quay site allocation also include the improvement of strategic links from Canary Wharf to Poplar High Street thought he provision of new north-south links and facilitating connections across Aspen Way.

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									where summaries of potential Green Grid Interventions are provided, the 'Poplar DLR Station Link' table does not identify any requirement for either a "new" or an "enhanced" footbridge. We suspect therefore that the position of the new link on Figure 13 has been shown in error and the Figure should be updated accordingly. The route of the 'proposed Green Grid extension should also be updated so that it crosses the Billingsgate as opposed to the North Quay site			
1143327	Neil Lawrence	The Royal Foundation of St Katharine and Acorn and GH (RF) Ltd	LP826	PART 3: POLICIES, Figure 13 : An enhanced network of open spaces and water spaces	No	Positively prepared; Justified; Consistent with national policy			We therefore object to identification of the previously developed land at 2 Butcher Row, Limehouse, as 'open space' on Figure 13 of the Draft Local Plan. A plan identifying the relevant area is attached. It is not identified or assessed in the Local Plan evidence base document (Parks and Open Spaces – An Open Space Strategy for the London Borough of Tower Hamlets 2017-2027). Map No. 5 of the Open Space Strategy sets out open spaces within the eastern part of the borough, with an assessment of the typology of spaces. The site at Butcher Row is not identified or assessed. The site at 2 Butcher Row is long disused previously developed land, immediately adjacent to Limehouse Station. The site has significant potential for a sustainable residential-led mixed use development adjacent to public transport, in line with the principles of the NPPF and the London Plan. It currently has restricted public access and is occupied by a temporary meanwhile use (St Katharine's Precinct), pending the planned comprehensive redevelopment of the site in the short term. Policy S.OWS1 and the associated Figure (13) and supporting explanation should be amended to ensure that previously developed sites and/or those sites with potential for development are not afforded open space protection. This would ensure that the Local Plan is sound and that it would enable sustainable development. *See site plan attached to representation*	Yes		2 Butcher Row is not designated as "open space" on the Policies Map. The diagrams are only indicative and give a broad indication of the open space provision in the borough. Detailed boundaries are identified on the policies map.
1033229	Paul Burley	Montagu Evans LLP	LP52	PART 3: POLICIES, Figure 13 : An enhanced network of open spaces and water spaces	No	Justified			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Creating a Network of Open Spaces Amongst other things, this draft policy seeks publicly-accessible open space and green grid linkages and says that proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces. The Council's Regulation 123 Schedule envisages that open space will be delivered by way of CIL contributions. The requirement in this policy could therefore result in double or even triple dipping as explained in our representations on draft Policy OS3 at the Regulation 18 stage.	Yes		The anticipated significant additional growth set to take place within the borough will increase the demand for publicly accessible open spaces. The Infrastructure Delivery Plan and the Open Space Strategy specify the council's approach to enhancing and increasing the borough's open spaces. The development taking place within the growth areas will provide opportunities to meet the needs arising from new development as well as contributing to meeting existing needs. New developments, which result in an increase in the demand for open spaces will therefore be required to make appropriate provision for new or

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												enhanced publicly accessible open spaces in line with the Local Plan policies to contribute to the sustainable growth in Tower Hamlets. The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind").
1053788	Steve Craddock	The Canal & River Trust	LP379	PART 3: POLICIES, Figure 13 : An enhanced network of open spaces and water spaces	N/A			An attachment has been submitted by CRT identifying specific proposed improvements to the Limehouse Cut Canal.				Comment noted.
1142493		Berkeley Group	LP372	PART 3: POLICIES, Figure 13 : An enhanced network of open spaces and water spaces	N/A			Goodman's Fields now includes a public open space as part of the development. This should be included on Figure 13.		Yes		The diagrams are only indicative and give a broad indication of the open space provision in the borough.
1142661	Abdul Basit		LP559	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	N/A			While the 'greening of facades' is welcomed, there is no policy that provides any specific guidance and is inadequate given the density and scale of development It also fails to ensure that the green and open space will be equally spread out within the borough and not only in one part only i.e. stacking up a high dense of population in one area i.e. the IoD and having all the green space in the other; the greenery and open space policy should be evenly spread throughout the borough, currently we are under the per hectare green space and moving into dangerous territory; this should be addressed in the new local plan				Comment noted. The Open Space Strategy and the Green Grid Strategy seek to address the deficiency of open space across the borough.

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1141890	Amanda Day		LP23	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No	Positively prepared			The whole of Wapping faces the River Thames and yet there is no mention of the historic river stairs that lead from narrow alleyways onto the Thames. These are in the main around 500 year old and there is no policy to restore the stairs that are crumbling and improve access to the Thames.			Policy D.OWS4 makes a reference to the improved environment and river heritage in line with the Thames Vision and recognises the importance of the borough's valuable water space heritage assets, and their protection and enhancement are further reinforced in policy S.DH3.
1105881	Michael Atkins	Port of London Authority	LP318	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No				10. Policy S.OWS1: Creating a network of open spaces (page 122) The PLA welcomes proposals to maximise the opportunities to create/increase publically accessible open space by the river. The PLA considers that such schemes should be accompanied by the provision of appropriate riparian life saving equipment – see comments below under policy D.OWS4 below.			Comment noted. We do not regard it as feasible to require all development proposals i.e. extensions, to provide life-saving equipment all the way along the riverfront. They should be delivered in those locations where the greatest potential risk is identified. A minor amendment is proposed to paragraph 8.48 as follows: Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, and active frontages to improve surveillance and riparian lifesaving equipment where appropriate . Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.
1143327	Neil Lawrence	The Royal Foundation of St Katharine and Acorn and GH (RF) Ltd	LP816	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No	Positively prepared; Justified; Consistent with national policy			Part 3 - Enhancing Open Spaces and Water Spaces; Chapter 8 Policy S.OWS1 - Creating a Network of Open Spaces Paragraphs 8.10 - 8.18 Figure 13 - An Enhanced Network of Open Spaces and Water Spaces We object to Policy S.OWS1, the supporting explanation at paragraphs 8.10 to 8.18 and Figure 13 of the Draft Local Plan. We consider that the overall approach to the protection of open space is unsound. This is on the basis that the policy is not adequately justified; it is not considered to have been positively prepared and would not enable the delivery of sustainable development, which is inconsistent with the National Planning Policy Framework (NPPF). The Local Plan Policies Map includes designated open space. These open space designations are also set out in the Key Diagram (Figure 5). Figure 13 however, identifies a significant number of additional open spaces, which are not shown on the Policies Map and Key Diagram. Some of these are named, but others are not specifically referenced. The distinction between those named and unreferenced open spaces on Figure 13 is unclear. Part (a) of the policy refers to "protecting all existing open space to ensure that there is no net	Yes		Comment noted. Paragraph 73 of the NPPF states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Current policy 7.18 of the London Plan states that appropriate designations and policies should protect open space to address deficiencies. The Open Space Strategy (2017) found that there was a total of 0.89 ha per 1,000 residents in Tower Hamlets in 2016/2017 which is less than the local open space standard at 1.2 ha per 1,000 residents. As such, the council considers that it is appropriate to protect open spaces regardless of their size, type and ownership in order to respond to the identified open space deficiency which is in line with national and regional planning policies.

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									loss". The supporting explanation at paragraph 8.12 indicates that "for the purposes of the Local Plan, open spaces means all land that offers opportunity for play, recreation or sport or is of amenity value, whether in public or private ownership, and where public access is unrestricted, partially restricted or restricted". Paragraph 8.14 further explains that "Part (a) seeks to protect all open spaces regardless of their size, type, ownership and where access is unrestricted, partially restricted or restricted". It is considered that such a blanket protection of "all existing open space" regardless of its size, type, ownership and level of accessibility, is both inappropriate and unjustified. The policy appears to confer the same level of policy protection on all forms of open space and makes no allowance for the circumstances of particular types of space. This is considered to be inappropriate, as it too inflexible and restrictive and could prejudice the delivery of future development proposals. The designation and protection of vacant and underutilised previously developed land as 'open space', fails to recognise the potential of sites to deliver new housing. This conflicts with the Government's objectives for housing growth. In order to meet the growing need for homes, the Government's White Paper "Fixing our Broken Housing Market" (February 2017) advises of the need for "making more land available for homes in the right places, by maximising the contribution from brownfield land". This principle is also set out in the NPPF, which advises authorities to "encourage the effective use of land by reusing land that has been previously developed (brownfield land) (paragraph 17)". There is a clear and identified need for housing within the borough and throughout London. Tower Hamlets has a requirement to provide a minimum of 54,455 additional homes within the plan period. The identification and protection of previously developed land as 'open space' would not be consistent with the core objective of planning for new homes and other uses.			
790873	Sport England	Sport England	LP853	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No	Positively prepared; Effective; Consistent with national policy			Policy S.OWS1: Creating a network of open spaces As noted above, Sport England has concerns that the Local Plan has generic policies to address sports provision, in particular playing fields. In this respect, Part 1 a) should not only protect the quantity of existing open space but also its function. Currently Part 1 a) would allow a situation where a playing field is changed to a more generic open space. Sport England object to this as it is contrary to the NPPF, paragraph 74. If the Council continue to have overriding open space policies Part 1a) should be amended to include the function of the open space to be protected. Again, the Open Space Strategy, referred to in Part 1 b) is not a strategy that	Yes		The Open Space Strategy (2017) identified deficiency of open space within the borough. As such, the council considers it is appropriate to create policies that protect all open spaces, including playing fields given that they would mainly form part of the open space. Paragraph 74 of the NPPF does not given more weight to the playing fields rather than other types of open spaces. Therefore, the policy is considered sound and in line with the NPPF. The Playing Pitches Assessment includes an assessment of the borough's playing pitches

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								adequately sets out a clear strategy for playing field and pitches over the plan period. As noted above, in relation to playing field and pitches it does not thoroughly develop the issues and key findings of the PPA. The activities set out in the Open Space Strategy mostly do not relate to the PPA findings, except for policy protection of playing field/open space, work needed to ancillary/supporting facilities and that there is a demand for a 3G Artificial Grass Pitch but even these aspects are not clearly and specifically developed to form any strategy that can steer playing pitch/field provision in the borough. The Open Space Strategy does not, for instance, adequately set out current and future supply/balance for each pitch type and size taken from the PPA, establish the main issues for each sport, set out the sport by sport scenarios that may affect the supply/demand balance and sets out policy recommendations. There has been no input from stakeholders, such as sport national governing bodies and Sport England and it has not followed Stage D of the Sport England's Playing Pitch guidance, which is the recognised guidance for formulating strategies for playing pitches, despite the Council confirm that it would do so. Therefore, basing a Policy on a strategy that is not robust is not positively preparing a plan nor consistent with national policy (NPPF paragraph's 17 and 73). The Council, should revisit the Open Space Strategy in relation to playing fields/pitches and develop a robust strategy that would feed into the wider Open Space Strategy, as agreed before the PPA was developed. The above aside, Part 1 b) refers to Active Design, some principles of which could be applied to improving open spaces, but the guidance is wider than parks and could be located within overarching policies at the beginning of the Local Plan, as previously noted, or possibly at the beginning of this policy. Paragraph 8.16, for example, which supports Part 1 c) highlights some measures could be considered to fall within the principles of Active Design. In relation to Part 1 d) the term 'maximising the opportunity' is of concern as new provision should be created if there are deficiencies. Part 1d) is vague of what is required which serves as evidence that the Council do not have a clear strategy for playing pitches/field. Although Sport England would not expect that the Local Plan would set out actual pitch type requirements it should be clearly linked to a clear action plan that sets out what would be required and where and what would require improving etc. which, as previously explained, Sport England does not consider the Council to currently have.			and outdoor sports facilities following Sport England's Playing Pitch Strategy Guidance. The Open Space Strategy includes an overarching open space action plan, also containing high level actions relating to outdoor sport facilities. Additional information has been provided in the Playing Pitches Assessment (2017) and Playing Pitches: Options for Future Investment (2018) which set out a supply and demand assessment of playing pitch facilities in accordance with Sport England's Playing Pitch Strategy Guidance. Bringing these aspects together allows different demands on limited open space to be balanced more effectively in a high density borough. In addition and based on these strategies, the Infrastructure Delivery Plan is a key document supporting the Local Plan. It provides an assessment of the current supply and future need for sport facilities and playing pitches (included in the open space sections of the document) and identifies specific projects to help address this need. On this basis, it is considered that he plan provides an adequate framework for sustainable planning for sport facilities, including playing fields.

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1142394	Stephen Wilkinson	Lee Valley Regional Park Authority	LP252	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No	Effective			<p>Thank you for consulting the Regional Park Authority on the Regulation 19 draft Local Plan 2031 'Managing growth and sharing the benefits'. This was considered by the Authority's Regeneration and Planning Committee on 9th November 2017 when the following was agreed. Within Tower Hamlets the Regional Park consists of linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut, which connect the Regional Park with the River Thames, and part of the Greenway. Also included in the Park is East India Dock Basin (a site of Importance for Nature Conservation) which forms the southernmost gateway to the Regional Park with important heritage interest, including a number of listed features. Two linear route sections are now incorporated into the area of the LLDC; a short section of the Greenway, and the Lea Navigation towpath between the Hertford Union Canal and Three Mills. References in the draft Local Plan to the Regional Park, the Park Development Framework and a commitment to the Lea River Park and the Leaway are welcomed. To date the Authority has responded to the previous consultations with matters of detail. I am aware of the approach generally taken to plan development involving a constant refining down of comments as successive drafts of plans are developed. However, upon consideration of the current draft it is evident that there is a fundamental principle included within the plan which we would wish to challenge. Under the section 'Setting the Scene', there is an explicit admission that, 'As the borough becomes more densely populated, levels of open space deficiency are expected to increase'. The paragraph continues to explain that 'interventions' will become 'increasingly important, especially within deficient areas.'</p> <p>Underpinning the whole planning system is one of balance. This is reflected in the National Planning Policy Framework (NPPF 2012) which seeks to balance the potentially impacts of new development through the definition of sustainable development which embraces the three limbs of economy, social and environmental. I consider that in Tower Hamlets its historic legacy of development represents an imbalance when set against the need for green infrastructure; this is manifest in the levels of open space deficiency. The plan needs to address this in a more fundamental way than as proposed. Whilst key development sites are identified within each of the 4 sub areas with outline proposals a similar level of detail should be given in the draft plan to how open spaces could be developed including the Authority's site at East India Dock Basin and those forming the Lea River Park. This detail should draw out the public health and other green infrastructure benefits of open space and how this can support active lifestyles and</p>			<p>Comment noted. The Local Plan seeks to balance the competing land use pressures in the borough in a sustainable manner, and its policies will promote delivery of publicly accessible open spaces in variety of ways across the borough. We would welcome further discussions with the Lee Valley Regional Park Authority on any opportunities to further promote delivery of new and enhancement of existing open and water spaces.</p>

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									<p>create healthier neighbourhoods. Whilst the parameters of development sites at for example Alisa Street and Leven Road include reference to quantum of open space it is unclear whether this is to serve local need required by the proposed development platform or whether this will serve wider needs. We would argue that there has to be greater priority given to new investment in open spaces; this could be articulated through more detailed briefs which focus on improving the quality of open space as much of the quantum funded by the CIL. Sites such as East India Dock Basin and the towpaths along the Limehouse Cut should be considered for new investment in this way. The statutory purpose of the Regional Park is designed to provide a dedicated place for recreation, leisure, sport and nature reserves. Underpinning this is a belief that the legacy of rampant poorly planned urban development during the nineteenth century which affected the Borough needs to be fully addressed with more specific policies. Officers from the Authority would be pleased to meet with your team to resolve these matters.</p>			

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1053788	Steve Craddock	The Canal & River Trust	LP387	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No	Justified; Effective			Policy S.OWS1 aims to protect 'all existing open space to ensure that there is no net loss'. Even though it is not shown on the policies map, we understand from the Council's Open Space Strategy (tables 2.1 and 2.2) that this would apply to Millwall Outer Dock Slipway, which is identified as a 'pocket park'. These are described on p28 of the Open Space Strategy as 'small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating'. We suggest that this is not an appropriate description of an area that has a functional water-related use (albeit one that only applies during a limited range of tide levels), is predominantly hard landscaped and is in private ownership. It appears to us that the slipway is not a well-used resource for the local community. We suggest that the policy is not justified because it is not founded on a robust evidence base. The Council appears to recognise that the slipway does not currently provide a high-quality environment. It's vision and objectives for the Isle of Dogs and South Poplar include the delivery of a 'new park at Millwall Slipway' (p221). However, there is no detail on how this will be delivered. As stated above, this site is in private ownership (the Trust's) and there has been no discussion with the Trust about how the Council's aspirations for the site will be delivered. On the other hand, the Trust has previously indicated a willingness to deliver: <ul style="list-style-type: none"> • A well-designed landscaping scheme. • A scheme that would highlight the presence and importance of the former lock and create visual links to the River Thames. • An improved slipway, in order to enhance access to the River Thames for leisure purposes for a greater range of river levels. • Dedicated space for parking and manoeuvring of vehicles and boats. These works could only be delivered by the Trust in connection with a viable development scheme on the site. The Trust would suggest that at present, the objective of a 'new park at Millwall Slipway' is not deliverable and, therefore, not effective. We suggest that the lists of open space in tables 2.1 and 2.2 of the Council's Open Space Strategy should be amended to remove Millwall Outer Dock Slipway on the basis that it does not meet the definition of a 'pocket park'. It would not be justified to protect this area in accordance with policy S.OWS1. 	No		The area of land referred to a Millwall Outer Dock pocket park in the Open Space Strategy (OSS) is not the slipway itself but the adjacent land owned by the council. Map 6 of the OSS shows the space and defines its function as a civic space and it accords with that function. The OSS is not the definitive arbiter that determines whether land should be considered open space. Inclusion or otherwise in the OSS is therefore is not the relevant factor in applying policy S.OSW1 which protects all open space as per the definition in the Local Plan at paragraph 8.12. However, point 16 within the development principles for the Isle of Dogs has been amended as follows: Facilitate the delivery of useable, high quality new and improved publicly accessible open space that is well integrated into the green grid network, including a new park at Millwall Slipway including improvements to Millwall Outer Dock Slipway to increase the usability of this existing open space.
1142985	Transport for London (TfL)	Transport For London	LP730	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open	N/A			<ul style="list-style-type: none"> ▪ TfL would welcome the inclusion and reference to Healthy Streets within this section, as well as more broadly the role it could play to help achieve the policies set out within the Local Plan. 			<p>Comment noted. Paragraph 8.16 under policy S.OWS1 has been amended to state the following:</p> <p>Part c promotes the delivery of a well-connected and high quality network of publicly accessible open spaces through new and improved green grid connections, in accordance with the Transport for</p>	

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				spaces								London's healthy streets initiative.
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP932	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	Yes		The policy requirement for proposals to contribute to the delivery of well-connected and publicly accessible open space is supported. The requirement to deliver improved network of green grid links to enhance access to key destination points such as publicly accessible open space and along water spaces. Proposals within site allocations should also assist with the delivery of enhanced new strategic publicly accessible open spaces which is supported.					Comment noted.
635854	Barts Health NHS Trust		LP242	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	No				S.OWS1: Creating a Network of Open Spaces Amongst other things, this draft policy seeks publicly-accessible open space and green grid linkages and says that proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces. The Council's Regulation 123 Schedule envisages that open space will be delivered by way of CIL contributions. The requirement in this policy could therefore result in double or even triple dipping as explained in our representations on draft Policy OS3 at the Regulation 18 stage.	Yes		The anticipated significant additional growth set to take place within the borough will increase the demand for publicly accessible open spaces. The infrastructure Delivery Plan and the Open Space Strategy specify the council's approach to enhancing and increasing the borough's open spaces. The development taking place within the growth areas will provide opportunities to meet the needs arising from new development as well as contributing to meeting existing needs. New developments, which result in an increase in the demand for open spaces will therefore be required to make appropriate provision for new or enhanced publicly accessible open spaces in line with the Local Plan policies to contribute to the sustainable growth in Tower Hamlets. The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The

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												delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind").
635797	Greater London Authority		LP684	PART 3: POLICIES, 8.10 Paragraph Policy S.OWS1: Creating a network of open spaces	Yes		The Mayor supports the draft policies that seek to protect open space and provide a proactive approach to creating a network of open spaces and water spaces across the borough.					Comment noted.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP132	PART 3: POLICIES, 8.18 Paragraph	No	Justified			The list of key strategies in paragraph 8.18 do not list any specific items in the areas undergoing the most development. None for example on the Isle of Dogs. The Local Plan clearly indicates a lack of green accessible open space in our Area but except for some site allocations (which are dependent on individual developer's efforts) there is no strategy to improve or deliver new green space. This is not Sustainable.	Yes		<p>Comment noted. The Open Space Strategy and Green Grid Strategy seek to deliver new and improved existing open spaces and access to them throughout the borough. In order to recognise the importance of the Thames Path, a minor modification has been suggested to amend the wording of paragraph 8.18 under policy S.OWS1 as follows:</p> <p>The provision of new or improved publically accessible open space and green grid linkages will be promoted throughout the borough in accordance with the Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance, notably at the following locations:</p> <p>- The Thames Path (i.e. maintaining and expanding the Thames Path to provide continuous public access to the river)</p>
1142985	Transport for London (TfL)	Transport For London	LP731	PART 3: POLICIES, 8.18 Paragraph	N/A			<ul style="list-style-type: none"> This section notes the need for a new continuous north-south route through the Lea Valley but completely ignores the role and connectivity provided by the TfL sponsored Lea Valley Walk, one of seven routes (the Strategic Walk Network) promoted and funded by TfL. We suggest this should be fully referenced here. A further focus on promoting and maintaining existing assets should be highlighted in order to complement creating new ones that parallel existing provision. 				<p>Comment noted. Reference to the role and connectivity provided by the TfL sponsored Lea Valley Walk has been added to paragraph 8.40 as follows:</p> <p>In accordance with part 4, development will be expected to demonstrate that it will enhance and not negatively affect the borough's publicly accessible open space, including the Lee Valley Regional Park (consisting of East India Dock Basin and linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut), and the Lea River Park (including the Leaway) and the Transport of London's Lea Valley Walk initiative.</p>

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1105881	Michael Atkins	Port of London Authority	LP321	PART 3: POLICIES, 8.22 Paragraph Policy S.OWS2: Enhancing the network of water spaces	N/A		note that the notes refer to the wrong policy - copied incorrectly. Correct details below. 11. Policy S.OWS2: Enhancing the network of water spaces (page 125) PLA broadly supports this policy, which seeks to support the creation of a high quality, usable and accessible water space network in the borough. However more detail could be provided to strengthen this policy further. Paragraph 8.25 of this policy is welcomed, which provides a list of appropriate infrastructure to support water-dependent uses. However it should be noted that the reference to security and safety, and the provision of riparian life saving equipment should not just be provided in relation to water-dependent uses, but to any use situated along the riverside, including residential development. In regards to part e which states that the Council will work with the PLA and the Canal and River Trust to ensure that residential and commercial moorings are situated in appropriate locations. The PLA in principle support this proposal, although would welcome entering into a statement of common ground to confirm this. There are a number of existing visitor moorings, marinas and watersports facilities within Tower Hamlets and the PLA would like to see these retained and, where possible, enhanced.				Comments noted. Additional reference to security and safety and the provision of riparian life saving equipment will be added to the supporting text at paragraph 8.48 as follows: Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, and active frontages to improve surveillance and riparian lifesaving equipment where appropriate.

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1053788	Steve Craddock	The Canal & River Trust	LP393	PART 3: POLICIES, 8.22 Paragraph Policy S.OWS2: Enhancing the network of water spaces	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			The Trust supports much of what policies OSW2 and OSW4 are seeking to achieve to deliver the Council's vision of a borough that makes 'best use of... waterways, including...dock basins and canals'. We welcome the fact that the Council has differentiated between open spaces and waterspaces so that policies OSW1 and OSW3 relate specifically to open spaces and OSW2 and OSW4 relate specifically to waterspaces, following comments that we made at regulation 18 stage. We believe that this provides the potential to properly recognise the benefits and opportunities of the borough's waterspaces. The Trust considers that on-water uses are an essential part of the character of canal and dock environments. The Trust's statutory predecessor, British Waterways, produced a Policy Advice Note with the Town & Country Planning Association, which suggests that the following should be an overarching guiding principle for policy formation:"Waterways and towing paths are spaces in their own right, and not just settings or backdrops to development or edges to policy designations."We consider that the aspiration to make best use of the waterways, expressed in the Council's vision, is consistent with this. We would like to see the local plan go further by committing to masterplanning work (undertaken in consultation with partner organisations like the Trust) for the waterspaces in the borough where there are key opportunities and/or challenges. We would also like to see developers encouraged to take the interaction between land and water uses into account in a holistic manner when preparing design and access statements. We suggest that this could be addressed in the supporting text of policy OSW2. Use of waterways for moorings for leisure purposes is often treated as an established use that does not require planning permission. However, some other mooring types are often treated as requiring planning permission. As well as providing variety in accommodation choice (as recognised by the Housing & Planning Act), residential uses on the water can help to provide natural surveillance and enhance the character of the network. We consider that the growth in the number of households living on boats in the borough has not been properly considered by the council to date and neither have the benefits. Commercial uses, including for tourists, can help to attract new visitors and generate new economic opportunities within the borough. We consider that the Local Plan should plan more positively for these uses. Unfortunately, we consider that there is a lack of clarity as to what may be acceptable in terms of development on the water in policies OSW2 and OSW4. Whether intentional or not, the policies contain significant ambiguities which could be used to frustrate development that other sections of the			Comments regarding masterplanning, encouragement of developers and licence and lease requirements from the CRT have been noted. The Water Space Study (2017) has recognised parts of the canal with various types of moorings. It should be noted that all moorings are likely to require a planning permission. These will be supported at appropriate locations in line with policies S.OWS2 and D.OWS4 to ensure that needs of both those living on boats and the surrounding residents and environment are considered. Paragraph 8.25 of policy S.OWS2 recognises that appropriate infrastructure, including commercial uses, would support water-dependant uses. As such, the Council considers that planning more positively for these uses has been embedded in the Local Plan. It is, therefore, considered that policies S.OWS2 and D.OWS4 provide sufficient clarity on the acceptability of developments within or adjacent to the borough's water spaces which is in line with paragraph 154 of the NPPF. In a densely populated borough like Tower Hamlets water spaces provide important benefits by providing open space for activity and relaxation and contributing to improving the residents' health and wellbeing of residents. The current London Plan categorises open spaces and towpaths alongside the River Thames, canals and other waterways as public open spaces. Given the current deficiency of open spaces in the borough, it is considered appropriate to promote policies that require developments not to have a negative impact on the openness and character of the water spaces. This approach is considered in line with the current London Plan policy 7.28 and the draft new London Plan policy SI17, which requires development proposals to support and improve and protect the distinct open character and heritage of waterways. The council disagrees that a greater weight should be placed on the increase of vibrancy and vitality by providing on-water uses rather than protecting openness. The council has taken a more balanced approach to safeguarding the openness of water spaces which also provides flexibility

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									<p>policy appear to support. Our primary concern is the insistence on 'openness' in point (e) of policy OSW2 and point (b) of policy OSW4. We are concerned that, at the individual site level, these policies will be used to prevent development of water-related uses that are otherwise supported by the policies because the boat, floating structure or infrastructure prevents an open view of a waterspace. We consider that this lack of clarity is inconsistent with paragraph 154 of the NPPF, which requires that only policies that provide a 'clear indication of how a decision maker should react to a development proposal should be included in the plan'. The policies are, therefore, unsound. We would also question whether the policies provide the most appropriate strategy and are, therefore, justified. The Trust has a number of criticisms of the Draft Tower Hamlets Water Space Study. We consider that it has identified some of the challenges and opportunities that exist. However, there are some glaring omissions, such as the significant growth in the number of households living on boats in London (see our covering letter). This is a matter that the Council now has a statutory duty to consider through the Housing and Planning Act. The strategy broadly recognises the multiple benefits of waterways but there is little attempt to suggest ideas for how some (such as supporting economic growth and developing destinations) can be achieved. We do not believe that it proposes ambitious but appropriate solutions. Despite our criticisms of the Draft Water Space Study, we agree with the character assessment of Millwall Inner Dock, which concludes that the waterspace is currently 'dark and unappealing'. We also agree with the findings that sections of West India Quay docks are 'sterile' and 'unused'. Appropriate strategies for these valuable assets will be ones that seek to increase its vibrancy and vitality by providing on-water uses, rather than protecting its openness. A strategy that seeks to increase on water uses, rather than prioritise the protection of openness, is consistent with the heritage of these waterspaces, which in their heyday would have been busy with on-water uses. This heritage character is recognised in the Council's Draft Waterspace Strategy (para 2.69). The development of water features, as the Water Space Study suggests for Millwall Inner, is not an appropriate strategy and neither, we believe, is relying on investment in new locks between the docks and the River Thames. We have previously provided comments directly to the Council on the Draft Waterspace Study. Given that the policies of the local plan do not propose that the study will have any significant weight in decision making, we will not repeat those in detail here. We have suggested to the Council that it should commit to developing master plans that consider the</p>			<p>for the enhancement and extension of facilities, especially within areas of need, as promoted by the current London Plan policy 7.27.</p>

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									<p>interaction between land and water in areas where the greatest change is proposed or where the greatest challenges or opportunities exist. The prevention of moorings within docks and basins on the grounds of openness would not be supported by the London Plan, which (in policies 7.27 and 7.30) identifies docks and basins as locations that moorings should be directed towards. Whilst we support the aim of increasing public interaction with our waterspaces, the use of waterspaces owned by the Canal & River Trust in Tower Hamlets requires a licence (or possibly a lease agreement) from the Trust. As such, there are restrictions on the public access that exists. We suggest, therefore, that the requirement in policy OSW4 for developments on waterspaces to provide increased opportunities for continuous public access to it and enjoyment may provide an unreasonable barrier to otherwise acceptable development. As such, we would suggest that this part of the policy is not positively prepared. We have suggested changes below that we believe could rectify this lack of soundness. In general terms, we consider that an assessment of a proposal's consistency with the character of the waterspace (including its heritage character), which is already referenced in the policy, allows for a more nuanced consideration of what level of development is acceptable. OSW2 Proposals will be required to support the creation of a network of high quality, insert <active> delete <usable> and accessible water spaces delete <network> through Reason: To ensure that the policy focuses on the delivery of an active use rather than the potential of use (plus a minor correction) (d) promote water spaces for cultural, recreational, insert <commercial> and leisure activities as well as movement, including passenger and freight transport (e.g. along the River Thames) Reason: to ensure consistency with point (e) of policy OSW2, which supports commercial moorings. We suggest that this change is required to ensure that the policy provides 'a clear indication of how a decision maker should react to a development proposal', in accordance with the NPPF. (e) working in partnership with the Port of London Authority and the Canal and River Trust to ensure that residential and commercial moorings are in appropriate locations that do not negatively impact on navigation, water quality, delete <the openness and> character of the water space and the amenity of surrounding residents; and Reason: To ensure that the policy is internally consistent and provides 'a clear indication of how a decision maker should react to a development proposal', in accordance with the NPPF. OSW4 (b) there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, delete <visual amenity, openness> and the character and</p>			

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									heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments Reason: To ensure that the policy is internally consistent and provides 'a clear indication of how a decision maker should react to a development proposal should be included in the plan', in accordance with the NPPF. (e) it will provide increased opportunities for delete<continuous> insert< appropriate> public access insert<to waterside spaces>, use of the water space for water-related uses and insert </or? sport and recreational activities Reason: We suggest that this requirement may provide an unreasonable barrier to otherwise acceptable development. As such, we would suggest that this part of the policy is not positively prepared and, therefore, not sound. 4. Development of residential moorings will be considered acceptable at suitable locations, and where they do not cause any adverse impact on navigation, biodiversity, the micro climate, the amenity of surrounding residents and, insert <where relevant>, the public enjoyment of the water space. Reason: We suggest that this requirement may provide an unreasonable barrier to otherwise acceptable development. As such, we would suggest that this part of the policy is not positively prepared and, therefore, not sound.			
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP933	PART 3: POLICIES, 8.22 Paragraph Policy S.OWS2: Enhancing the network of water spaces	No				The provisions of this policy are replicated in Policy S.OWS4 and are therefore unnecessary. It is requested that this policy is deleted from the plan.			Policy S.OWS2 provides strategic overarching principles, while Policy D.OWS4 provides further development management details. As such, it is considered necessary to contain both policies in the Local Plan.

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1142548	Grafton Group PLC	Grafton Group PLC	LP442	PART 3: POLICIES, 8.22 Paragraph Policy S.OWS2: Enhancing the network of water spaces	No				NOTE THIS IS DUPLICATED IN COMMENTS BY THEIR DEVELOPMENT PARTNER Policy S.OWS.2: Enhancing the network of water spaces Having regards to the Frameworks requirement for consistency between strategic and local policies our current objective for redevelopment of the site is the reactivation of Orchard Wharf for waterborne freight use as part of a mixed use redevelopment consistent with current London Plan policy, we are at this time broadly supportive in principle of the overall aims of Policy S.OWS2. We particularly support the objective of promoting water spaces for movement including freight transport. We also recognise that one of the stated aims of the policy is protect the integrity of the borough's water spaces. However, Paragraph 8.25 of the supporting text then goes on to outline that development should not 'result in further loss or over sailing of the borough's valuable water space unless it a water-related or water-dependent use at appropriate locations.' Para 8.24 defines water space as including land adjacent to the various types of water bodies, and therefore, the statement at Para 8.25 could be misinterpreted as implying that vertical style mixed use developments which involve water related uses on lower levels adjacent to the water with other land uses located above in inappropriate. It is noted that the definition of water space at Appendix 1 of the Local Plan 'Glossary and Acronyms' is also not consistent with Para 8.25 insofar as it refers to water space as 'bodies of water including rivers, canals, docks, basins, ponds and marshland' only. The definition in the Glossary does not refer to land adjacent to water bodies. It is clear from precedent examples across London and further afield that successful mixed-use development involving water related uses located adjacent to rivers and other water bodies can successfully development with a complementary mix of uses located above. Such forms of development should be considered appropriate so long as the development will not compromise the suitability of the water space for water related uses. Given the proximity of Orchard Wharf to East India Dock Basin, we are also supportive of the principle of maximising the aesthetic, ecological and biodiversity values of the borough's water spaces and their immediate and surrounding areas. In this regard, the reactivation and redevelopment of the Orchard Wharf site provides potentially the only opportunity available to significantly enhance the values of the existing East India Dock Basin. We do not consider the policy as currently drafted to be sound for the reasons outlined above.			Comment noted. The wording from policy S.OWS4 and glossary terms in the appendix 1 (page 282). have been amended to remove 'adjacent land' from the definition of water space. Paragraph 8.24 states as follows: For the purposes of the Local Plan, water space means an area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies. Water space: An area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.

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1142556	Regal London	Regal London	LP446	PART 3: POLICIES, 8.22 Paragraph Policy S.OWS2: Enhancing the network of water spaces	No				NOTE THIS IS DUPLICATED IN COMMENTS BY THEIR DEVELOPMENT PARTNER Policy S.OWS.2: Enhancing the network of water spaces Having regards to the Frameworks requirement for consistency between strategic and local policies our current objective for redevelopment of the site is the reactivation of Orchard Wharf for waterborne freight use as part of a mixed use redevelopment consistent with current London Plan policy, we are at this time broadly supportive in principle of the overall aims of Policy S.OWS2. We particularly support the objective of promoting water spaces for movement including freight transport. We also recognise that one of the stated aims of the policy is protect the integrity of the borough's water spaces. However, Paragraph 8.25 of the supporting text then goes on to outline that development should not 'result in further loss or over sailing of the borough's valuable water space unless it a water-related or water-dependent use at appropriate locations.' Para 8.24 defines water space as including land adjacent to the various types of water bodies, and therefore, the statement at Para 8.25 could be misinterpreted as implying that vertical style mixed use developments which involve water related uses on lower levels adjacent to the water with other land uses located above in inappropriate. It is noted that the definition of water space at Appendix 1 of the Local Plan 'Glossary and Acronyms' is also not consistent with Para 8.25 insofar as it refers to water space as 'bodies of water including rivers, canals, docks, basins, ponds and marshland' only. The definition in the Glossary does not refer to land adjacent to water bodies. It is clear from precedent examples across London and further afield that successful mixed-use development involving water related uses located adjacent to rivers and other water bodies can successfully development with a complementary mix of uses located above. Such forms of development should be considered appropriate so long as the development will not compromise the suitability of the water space for water related uses. Given the proximity of Orchard Wharf to East India Dock Basin, we are also supportive of the principle of maximising the aesthetic, ecological and biodiversity values of the borough's water spaces and their immediate and surrounding areas. In this regard, the reactivation and redevelopment of the Orchard Wharf site provides potentially the only opportunity available to significantly enhance the values of the existing East India Dock Basin. We do not consider the policy as currently drafted to be sound for the reasons outlined above.			Comment noted. The wording from policy S.OWS4 and Glossary terms in the Appendix 1 on page 282. have been amended by making minor modification to remove 'adjacent land' from the definition of water space. Paragraph 8.24 states as follows: For the purposes of the Local Plan, water space means an area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies. Glossary terms relating to water space will be amended as follows: An area of water (permanently or intermittently) and the adjacent land, and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.

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790873	Sport England	Sport England	LP863	PART 3: POLICIES, 8.23 Paragraph	Yes		Policy S.OWS2: Enhancing the network of water spaces and Policy D.OWSE4: Water Spaces Sport England welcome the promotion of recreation and leisure use of water spaces as these areas would have notable impact on health and wellbeing within some areas of the borough.			Yes		Comment noted.
1033229	Paul Burley	Montagu Evans LLP	LP53	PART 3: POLICIES, 8.31 Paragraph	No	Justifi ed			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Open Space and Green Grid Criteria a-d at Part 1 of this policy should be restructured so that the policy reads more easily. The policy should have two parts: part a dealing with sports facilities and part b dealing with other development proposals. Part a could then have three sub-criteria: i, ii and iii which are the current parts a, b and d. Part 2 seeks the delivery of new publicly-accessible open space on-site when strategic development is proposed. As at the Regulation 18 stage we object to this because it implies that developers will have to cede land (which could affect viability) and because it would, in effect, result in developers paying more than once for open space given that CIL is meant to go towards the provision of strategic open space. Furthermore, this part of the policy is not need-driven and as Figure 14 on page 122 of the Regulation 19 version indicates, large parts of the borough are not areas with open space deficiencies. Requiring further open space in such locations will do nothing to address the deficiencies elsewhere in the borough and Part 5 says that development adjacent or in close proximity to the green grid network (i.e. 200 metres) is required to demonstrate that it will not have adverse impacts on the access, design, usability, biodiversity and recreational value of the green grid network. It also says that development should also contribute to the expansion and the enhancement of green grid links to connect communities to publicly accessible open spaces and water spaces as well as other main destination points, such as town centres, schools, health facilities and transport hubs. Again we maintain out objection made at the Regulation 18 stage and highlight that such a requirement, in addition to CIL and part 2 of the proposed policy, could result in triple dipping.	Yes		Part 1 deals with exceptional circumstances which would be considered appropriate for the loss of areas of open space and playing fields. As such, it is not considered to restructure it other way. The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind"). The Open Space Strategy (2017) found that there was a total of 0.89 ha per 1,000 residents in Tower Hamlets in 2016/2017 which is less than the local open space standard at 1.2 ha per 1,000 residents. Furthermore, strategic developments (i.e. more than 100 homes or over 10,000 square metres floorspace) are likely to place significant additional demand on existing publicly accessible open space, particularly in identified areas of open space deficiency. New developments, which result in an increase in the demand for open spaces will therefore be required to make appropriate provision for new or enhanced publicly accessible open spaces in line with the Local Plan policies to contribute to the sustainable growth in Tower Hamlets. The Green Grid Strategy (2017) suggests that 200 metres (equivalent to approximately 3 minutes walking time) may be an appropriate distance threshold to adopt. A

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												200m distance could be reasonably considered to be within the same community or neighbourhood as the development and a 'direct relationship' would exist between the Green Grid and the development.
1105881	Michael Atkins	Port of London Authority	LP322	PART 3: POLICIES, 8.32 Paragraph Policy D.OWS3: Open space and green grid networks	No				12. Policy D.OWS3: Open space and green grid networks (page 128) The PLA considers that riverside schemes for new publically accessible open space should be accompanied by the provision of adequate riparian life saving equipment – see comment on policy D.OWS4 below.			Comment noted. A minor amendment has been proposed to paragraph 8.48 as follows: Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, and active frontages to improve surveillance and riparian lifesaving equipment where appropriate . Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.
790873	Sport England	Sport England	LP858	PART 3: POLICIES, 8.32 Paragraph Policy D.OWS3: Open space and green grid networks	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			Policy D.OWS3: Open Space and Green Grid networks. Sport England is concerned with the wording of Policy D.OWS3. The NPPF, paragraph 74, states that the loss or partial loss of playing field should not occur unless certain criterion is met. It does not indicate that it would be supported in some circumstances. In this respect, Sport England recommend that Policy D.OWS3 is worded like paragraph 8.33 which states 'resisted' although Sport England would prefer the policy to state 'refused'. Part 1 a) allows the loss or partial loss if essential facilities to enhance the function, use and enjoyment of open space are proposed. While the example of ancillary sports facilities is given and in this context aligns with Sport England and the NPPF, this policy could result in non-sporting facilities on playing field which is contrary to national and Sport England policy. The supporting text in paragraph 8.33 does not adequately clarify this as it indicates that non-sporting facilities could be located on playing field, e.g. play equipment, which would receive an objection from Sport England unless it affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site. Part 1 b) is welcomed as it is broadly in line with Sport England Policy and the NPPF however Sport England would prefer that Part 1 b) is clear that there should be a need for new sports facilities, although this could be added in the supporting text. Part 1 c) raises concerns as the wider development proposal	Yes		The current wording seeks to supports developments on areas of open space only if exceptional circumstances are met which would maximise the opportunities for delivery of new and enhanced open space, and for enhancing accessibility and connectivity to the wider network as stated in the supporting text in paragraph 8.32. Paragraph 8.33 clearly states that any other development will be resisted except the circumstances specified in the policy. A minor modification has been made to part 1 of policy D.OWS3 as follows: 1.Development on areas of open space and the loss of playing fields arising from development will only be supported in exceptional circumstances where: a.it provides essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or b.it is a sports facility, the sporting and recreational benefits of which would outweigh the harm resulting from the loss of playing field; c. b. as part of a wider development proposal, both an increase of open space and a higher quality of open space can be achieved; and d c. in any of the circumstances described in parts 2a and 2b, it is demonstrated that it will not result in any adverse impacts on the

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								<p>could include 'pocket parks' that cumulatively are larger than a playing field, or partial playing field, lost but have minimal benefits for sport. In addition, it suggests that a playing field can be lost and merely an area of open space is provided. Sport pitches/fields must be a certain standard to be effective and new open space may not meet this standard. As result, Sport England questions whether Part 1 c) is in line with the NPPF, paragraph 74, notably bullet point two and therefore suggest that part 1c) is changed to "as part of a wider development proposal, at least replacement playing field/open space of at least equivalent quantity, quality and accessibility is provided". This amendment would bring Part 1 c) in line with the NPPF and Sport England's Policy. In relation to Part 2, the stance of Part 2 d) is supported but Sport England recommended that additional provision should meet identified needs so that the Council are not challenged when seeking such provision. The Council would need a robust strategy to support this. Although insinuated in Part 2, Part 3 states that development should not rely on existing publicly accessible open space to contribute towards on-site communal amenity space. The PPA highlights deficiencies in playing field therefore any increase in population would add demand which not addressed would add further stain on the existing facilities therefore Sport England also considers that development should contribute.</p>			<p>existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site; and</p> <p>d. it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss.</p> <p>New paragraph 8.35 has been insert to state the following:</p> <p>8.35 Part 1(d) seeks to ensure that outdoor sport and recreation facilities are protected against unjustified loss in line with the requirements set out in the National Planning Policy Framework.</p> <p>This will be further discussed at the examination in public.</p> <p>Given the deficit of open spaces in the borough, paragraph 8.36 and standards refer to all types of publicly accessible open spaces, including playing fields and pitches. The Playing Pitch Assessment (2017) presents a supply and demand assessment of playing pitch facilities in accordance with Sport England's Playing Pitch Strategy Guidance: An approach to developing and delivering a playing pitch strategy. Additional information has been provided in the Playing Pitches Assessment (2017) and Playing Pitches: Options for Future Investment (2018) which set out a supply and demand assessment of playing pitch facilities in accordance with Sport England's Playing Pitch Strategy Guidance.</p> <p>A more detailed action plan based on the findings of the playing pitches assessment will be included in the Infrastructure Delivery Plan. Reference to this has been added by making minor modification to the supporting text of the policy at paragraph 8.11 as follows:</p> <p>The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. Further details on the specific needs and priorities for the</p>

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												provision of playing pitches and outdoor sport facilities are outlined in the Infrastructure Delivery Plan.
1142493		Berkeley Group	LP417	PART 3: POLICIES, 8.32 Paragraph Policy D.OWS3: Open space and green grid networks	No				D.OSW3: Open space and green grid networks Part 2 duplicates, and in some cases contradicts the site specific design guidance in Site Allocations policies. A line should be added saying, except where Site Allocations policies apply Soundness test: Revise to make consistent and therefore effective	Yes		Local Plan policies provide a strategic approach to address delivery and enhancement of open spaces in the borough and specify strategic requirements for the delivery of new publically accessible open spaces. Site allocations provide additional details for the site specific development principles, and as such, they do not replace other policies within the Local Plan.

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635854	Barts Health NHS Trust		LP243	PART 3: POLICIES, 8.32 Paragraph Policy D.OWS3: Open space and green grid networks	No				Open Space and Green Grid Criteria a-d at Part 1 of this policy should be restructured so that the policy reads more easily. The policy should have two parts: part a dealing with sports facilities and part b dealing with other development proposals. Part a could then have three sub-criteria: i, ii and iii which are the current parts a, b and d. Part 2 seeks the delivery of new publicly-accessible open space on-site when strategic development is proposed. As at the Regulation 18 stage we object to this because it implies that developers will have to cede land (which could affect viability) and because it would, in effect, result in developers paying more than once for open space given that CIL is meant to go towards the provision of strategic open space. Furthermore, this part of the policy is not need-driven and as Figure 14 on page 122 of the Regulation 19 version indicates, large parts of the borough are not areas with open space deficiencies. Requiring further open space in such locations will do nothing to address the deficiencies elsewhere in the borough and Part 5 says that development adjacent or in close proximity to the green grid network (i.e. 200 metres) is required to demonstrate that it will not have adverse impacts on the access, design, usability, biodiversity and recreational value of the green grid network. It also says that development should also contribute to the expansion and the enhancement of green grid links to connect communities to publicly accessible open spaces and water spaces as well as other main destination points, such as town centres, schools, health facilities and transport hubs. Again we maintain out objection made at the Regulation 18 stage and highlight that such a requirement, in addition to CIL and part 2 of the proposed policy, could result in triple dipping.	Yes		Part 1 deals with exceptional circumstances which would be considered appropriate for the loss of areas of open space and playing fields. As such, it is not considered to restructure it other way. The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind"). The Open Space Strategy (2017) found that there was a total of 0.89 ha per 1,000 residents in Tower Hamlets in 2016/2017 which is less than the local open space standard at 1.2 ha per 1,000 residents. Furthermore, strategic developments (i.e. more than 100 homes or over 10,000 square metres floorspace) are likely to place significant additional demand on existing publicly accessible open space, particularly in identified areas of open space deficiency. New developments, which result in an increase in the demand for open spaces will therefore be required to make appropriate provision for new or enhanced publicly accessible open spaces in line with the Local Plan policies to contribute to the sustainable growth in Tower Hamlets. The Green Grid Strategy (2017) suggests that 200 metres (equivalent to approximately 3 minutes walking time) may be an appropriate distance threshold to adopt. A 200m distance could be reasonably considered to be within the same community or neighbourhood as the development and a 'direct relationship' would exist between the Green Grid and the development.
790873	Sport England	Sport England	LP860	PART 3: POLICIES, 8.34 Paragraph	No	Positively prepared; Effective; Consistent with national			As a side note, paragraph 8.34 states it refers to Part 1b) but should it refer to Part 1 c)?	Yes		Comment noted. Part 1 (b) of policy D.OWS3 has been deleted and new wording has been added as part 1 (d). Additional paragraph 8.35 has been added to further explain new part 1.d.

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						nal policy						
790873	Sport England	Sport England	LP862	PART 3: POLICIES, 8.38 Paragraph	No	Positi vely prepa red; Effect ive; Consi stent with natio nal policy			Sport England agrees that contributions to strategic projects should be sought as explained in paragraph 8.38. However, as previously explained, in relation to sports facility needs and requirements, the Open Space Strategy does not set out any specific sport projects, their costs, when they should be delivered etc.	Yes		A more detailed action plan based on the findings of the playing pitches assessment will be included in the Infrastructure Delivery Plan. Reference to this has been added by making minor modification to the supporting text of the policy at paragraph 8.11 as follows: The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. Further details on the specific needs and priorities for the provision of playing pitches and outdoor sport facilities are outlined in the Infrastructure Delivery Plan.
1142661	Abdul Basit		LP554	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	N/A			We support this policy as we have lost dock space in the past The local plan should also encourage to work around and incorporate the waters on and around the borough and create a complementary atmosphere for both the water and any future developments within its proximity				Comment noted. The suggested amendments are already embedded in policy D.OWS4.
1142844	Ahmed Hussain	Alpha Grove Freehold ers Associati on	LP655	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	Yes		Policy D.OWS4: Water spaces We support this policy as we have lost dock space in the past The local plan should also encourage to work aroundand incorporate the waters on and around the borough and create a complementary atmosphere for both the water and any future developments within its proximity			Yes		Comment noted. Support is welcomed.

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624580	Jason Larkin	Canary Wharf Group Plc	LP533	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	No	Positively prepared; Effective			Draft policy D.OWS4 states that development within or adjacent to the borough's water spaces is required to demonstrate that it does not result in a loss or covering of the water space, unless it is a water-related use at appropriate locations. In order to be effective, the policy needs to include a provision that in certain circumstances and where there are appropriate wider benefits (such as increased access to the water) that a loss of water space is acceptable. For example, the Canary Wharf Crossrail Over Station development resulted in a loss of water space yet has clear transport benefits and enhances pedestrian access to and enjoyment of the water. The reference to "water-dependent" uses should also be added to part (a) of the policy alongside "water-related" uses to ensure consistency with spatial draft policy S.OWS2: 'Enhancing the network of water spaces' and its supporting para. 8.25 which cites "water-dependent" as well as "water-related" uses. The requirement of part b of the draft policy that development should have no adverse impact on the "openness" of the water space also contradicts spatial draft policy S.OWS2 which does allow for infrastructure which could affect the openness of the water space. This part of the policy needs to acknowledge the exceptions for water-related and water-dependent uses as well as that in some circumstances the covering (which does not cause a loss of water) or oversailing of water (which can retain the visibility of water) can be appropriate.			In a densely populated borough like Tower Hamlets the water spaces provide important benefits by providing open space for activity and relaxation and contributing to improving the health and wellbeing of residents. Our policy approach is considered in line with the current and the draft new London Plan, which required development proposals to support and improve and protect the distinct open character and heritage of waterways. Policy S.OWS2 and D.OWS4 specify the type of development which would be considered water-related and water-dependant, recognising that these uses may result in net loss of water spaces, but are essential to deliver wider benefits, such as access. As such, reference to "water-dependent" uses has been added to part (a) of policy S.OWS2 by making a minor modification.
1105881	Michael Atkins	Port of London Authority	LP330	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	No				13. Policy D.OWS4: Water spaces (page 131) The PLA considers that there should be an additional criterion in part 1 of the policy requiring all new development within or adjacent to the boroughs water spaces to provide adequate riparian life saving equipment such as lifebuoys, grab chains and ladders, in order to improve shoreside safety. This relates to new residential development, new/improved public open spaces, new sports facilities etc. Whilst the PLAs Thames Vision does not specifically identify any Residential Mooring Opportunity Zones within the borough, the PLA welcomes the reference in the policy to the development of residential moorings subject to the specified criteria. As stated in paragraph 8.52 of the document the PLA would be willing to work with all relevant stakeholders, regarding the suitability of new moorings.			Riparian lifesaving equipment should be delivered in those locations where the greatest potential risk is identified. A minor amendment is proposed to paragraph 8.48 as follows: Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, and active frontages to improve surveillance and riparian lifesaving equipment where appropriate . Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.

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790873	Sport England	Sport England	LP864	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	Yes		Policy S.OWS2: Enhancing the network of water spaces and Policy D.OWSE4: Water Spaces Sport England welcome the promotion of recreation and leisure use of water spaces as these areas would have notable impact on health and wellbeing within some areas of the borough.			Yes		Comment noted.
1053788	Steve Craddock	The Canal & River Trust	LP361	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	No	Justified			In addition to those changes that we consider are necessary to make these policies sound, we suggest that the following changes should be made to the supporting text to policy OSW4: "Assessment of the aesthetic quality and heritage character of the borough's waterspaces, consistent with this policy, will include due consideration of the effects on the range of views of, from and in combination with, waterways and their towpaths. The character, integrity, legibility and geometry of historically hard-edged urban waterways and docks will be preserved. The Council will safeguard the functional traditions and means of navigating inland waterways and adjacent uses, such as, where appropriate, the means to use horses on towpaths as the motive power for craft, the convenient boarding and lighting of crew members as part of the efficient operation of locks, the intensive use of docks for navigation and boat mooring, including time-limited where appropriate" "In ensuring that development does not have an adverse impact on other existing active water uses, consistent with part 4 of policy D.OSW4, the Council will avoid adverse impacts caused by overshadowing, canyoning, loss of amenity of boaters or new waterside development that, because of its use and/or proximity, would result in poor conditions for occupiers". In addition we suggest that point (g) of D.OSW4 should support "sensitive restoration of river walls".			Comments noted. The council considers that preservation of the heritage, integrity and character of the borough's water spaces is sufficiently covered in the Local Plan policies D.OWS4 and S.DH3.

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1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP934	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	N/A			Flexibility should be incorporated into this policy to allow proposals to provide measures to mitigate against any impacts that proposals may have on the existing water spaces and active water uses. This is required for the plan to be effective and deliverable, and the policy should be revised as set out below:"1. Development within or adjacent to the borough's water spaces is required to demonstrate that: a. it does not result in loss or covering of the water space, unless it is a water-related use at appropriate locations; b. there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, openness and the character and heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments; c. it enhances the ecological, biodiversity and aesthetic quality of the water space, taking into account the design and landscaping of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan and the European Union Water Framework Directive; d. it does not have an adverse impact on or can suitably mitigate against any impact on other existing active water uses; e. it will provide increased opportunities for continuous public access, use of the water space for water-related uses and sport and recreational activities, f. it responds positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety; and g. it provides suitable setbacks from water space edges to mitigate flood risk and to allow riverside walkways, canal towpaths and cycle paths, where appropriate. Where necessary, development should contribute to the restoration of the river walls and embankments. 2. Development within the Thames Policy Area (as shown on the Policies Map) is required to consider the guidance provided within the most up-to-date				Comment noted. It is considered that sufficient flexibility has been given to developments within or adjacent to the borough's water spaces. Additional term 'water-dependant' has been added to provide clarification on development acceptable within or adjacent to the borough' water spaces.

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								Thames River Basin Management Plan and the relevant Southeast Marine Plan, where applicable. 3. Development adjacent to the borough's waterspaces is required to enhance the area's links with the water space and contribute to the delivery of continuous walkways, canal towpaths and cycle paths (e.g. completion of the Thames Path). 4. Development of residential moorings will be considered acceptable at suitable locations, and where they do not cause any adverse impact on navigation, biodiversity, the micro climate, the amenity of surrounding residents and the public enjoyment of the water space. "				
1142548	Grafton Group PLC	Grafton Group PLC	LP449	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	No	Effective			Policy D.OWS4: Water Spaces As with our comments on Policy S.OWS.2 and Para 8.25 above, we object to the draft wording of Part 1 (a) of Policy D.OWS4 that development should not result in the loss or covering of water spaces unless it is for water related uses. As outlined above, this would suggest that appropriate forms of mixed use development on land adjacent to water bodies (which are considered water space in the definition outlined at Para 8.24), where water related uses are located below other complementary uses, are prohibited. Such an approach would unnecessarily restrict appropriate development coming forward on sites adjacent to identified water bodies. We support the objectives of Parts (e) – (f) of the Policy S.OWS.4 and note that appropriate forms of mixed use development of sites adjacent to water spaces are likely to be the best means of achieving these objectives. Therefore, we also support the aims of Part 3 of Policy D.OWS.4. In this regard, we believe that where it is feasible and does not conflict with other designations (e.g. safeguarded wharf status), developments should actively seek to promote improved access to the borough's water spaces. We do not consider the policy as currently drafted to be sound for the reasons outlined above.			Comment noted. It is considered that sufficient flexibility has been given to developments within or adjacent to the borough's water spaces. Additional term 'water-dependant' has been added to provide clarification on development acceptable within or adjacent to the borough' water spaces.

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1142556	Regal London	Regal London	LP450	PART 3: POLICIES, 8.44 Paragraph Policy D.OWS4: Water spaces	No	Effect ive			DUPLICATE COMMENTS FROM DEVELOPMENT PARTNER Policy D.OWS4: Water Spaces As with our comments on Policy S.OWS.2 and Para 8.25 above, we object to the draft wording of Part 1 (a) of Policy D.OWS4 that development should not result in the loss or covering of water spaces unless it is for water related uses. As outlined above, this would suggest that appropriate forms of mixed use development on land adjacent to water bodies (which are considered water space in the definition outlined at Para 8.24), where water related uses are located below other complementary uses, are prohibited. Such an approach would unnecessarily restrict appropriate development coming forward on sites adjacent to identified water bodies. We support the objectives of Parts (e) – (f) of the Policy S.OWS.4 and note that appropriate forms of mixed use development of sites adjacent to water spaces are likely to be the best means of achieving these objectives. Therefore, we also support the aims of Part 3 of Policy D.OWS.4. In this regard, we believe that where it is feasible and does not conflict with other designations (e.g. safeguarded wharf status), developments should actively seek to promote improved access to the borough's water spaces. We do not consider the policy as currently drafted to be sound for the reasons outlined above.			Comment noted. It is considered that sufficient flexibility has been given to developments within or adjacent to the borough's water spaces. Additional term 'water-dependant' has been added to provide clarification on development acceptable within or adjacent to the borough' water spaces.
1142668	James Armitage		LP563	PART 3: POLICIES, 8.51 Paragraph	N/A			Enhancing open spaces and water spaces Can I also comment on 8.51, which rightly identifies the Thames path as an important amenity. I fully support the expansion on the eastern part go the Isle of Dogs, but would also like a stated objective to complete the western side. I have to come off the riverside at Arnhem Wharf primary and was down Westferry for half a mile before rejoining spoil the excellent walk around the Isle. While the commercial element may be difficult to achieve, most of this is frontage to residential development and there is no reason why this small group of developments should be exceptions. At the least the objective should be in the policies.			Comment noted. Local Plan policies, Open Space Strategy and the Green Grid Strategy seek to deliver improved continuous public access to all of the borough's water spaces including the expansion and enhancement of the whole of the Thames Path.	
1105881	Michael Atkins	Port of London Authority	LP333	PART 3: POLICIES, 9.7 Paragraph Policy S.ES1: Protecting and	Yes		14. Policy S.ES1: Protecting and enhancing our environment (page 135) The PLA supports this policy which aligns with the Thames					Support for policy S.ES1 is welcomed

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				enhancing our environmen t			Vision's aims to make the river the cleanest since the industrial revolution, with improved habitats.					
1102564	Richard Hill	Thames Water Utilities Ltd	LP778	PART 3: POLICIES, 9.7 Paragraph Policy S.ES1: Protecting and enhancing our environmen t	No	Effect ive			Policy S.ES1 Protecting and Enhancing our Environment We support Policy S.ES1 (protecting and enhancing our environment), however we would recommend that point d of the policy and paragraph 9.11 of the supporting text are amended to remove the reference to waste water use. The point re reducing clean water use is valid, however it is confused and contradicted by requiring the reduction of waste water use.			Policy S.ES1 will be amended as recommended: d. reducing clean and waste water use; as will the supporting text in the paragraph 9.11: Development must also address London's water stress by reducing clean and waste water use.
1142493		Berkeley Group	LP418	PART 3: POLICIES, 9.7 Paragraph Policy S.ES1: Protecting and enhancing our environmen t	No				S.ES1: Protecting and enhancing our environment Wording should be restricted to 'mitigating the adverse effects' of development rather than 'improving land and water quality'. Whilst most remediation schemes will improve land and water quality by their very nature, 'improving' is hard to quantify and may also lead to significant costs over and above a standard remediation/mitigation strategy. It should therefore be omitted Soundes test: Revise to make deliverable and therefore effective	Yes		Given the nature of development in the borough which is exclusively on brownfield land and is often the regeneration of dirtier uses into residential uses, development provides the opportunity to enhance land and water quality. In addition biodiversity and habitats in the borough are steadily improving as development moves away from dirtier uses and construction. It would therefore be regressive for the plan to simply seek to mitigate any negative impacts and not deliver improvements.
1142844	Ahmed Hussain	Alpha Grove Freehold ers Associati on	LP660	PART 3: POLICIES, 9.14 Paragraph	No				Policy D.ES2: Air quality There are no targets associated with this policy. What does good look like? The policy says 'air quality neutral' but what about the need to improve Air Quality? If there is no policy to improve "Air Quality" at least the plan could suggest that schools should not be built close to main road within estates to protect children from car pollution Note: no soundess test undertaken.	Yes		Air quality neutral is a specific measurable standard and does form a target for each development. It is recognised that the draft London Plan (2017) introduces the concept of 'air quality positive' but this has yet to be tested at EIP. D.ES2: Air quality (parts 2 and 4) do seek to ensure development of vulnerable uses (including schools) must address and mitigate poor air quality, such as positioning schools away from roads.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP137	PART 3: POLICIES, 9.14 Paragraph	No	Effect ive			There are no targets associated with this policy. What does good look like? The policy says, 'air quality neutral', but the Plan should include specific targets to address the need to improve air quality.	Yes		Air quality neutral is a specific measurable standard and does form a target for each development. It is recognised that the draft London Plan (2017) introduces the concept of 'air quality positive' but this has yet to be tested at EIP.

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1142661	Abdul Basit		LP558	PART 3: POLICIES, 9.15 Paragraph Policy D.ES2: Air quality	N/A			There are no targets associated with this policy. What does good look like? The policy says 'air quality neutral' but what about the need to improve Air Quality? If there is no policy to improve "Air Quality" at least the plan could suggest that schools should not be built close to main road within estates to protect children from car pollution				Air quality neutral is a specific measurable standard and does form a target for each development. It is recognised that the draft London Plan (2017) introduces the concept of 'air quality positive' but this has yet to be tested at EIP. D.ES2: Air quality (parts 2 and 4) do seek to ensure development of vulnerable uses (including schools) must address and mitigate poor air quality, such as positioning schools away from roads.
1105881	Michael Atkins	Port of London Authority	LP339	PART 3: POLICIES, 9.15 Paragraph Policy D.ES2: Air quality	No				15. Policy D.ES2: Air quality (page 136) The PLA supports policy D.ES2 on air quality which states that an air quality impact assessment is required as part of a number of different types of applications, including for major developments and new build developments in areas of sub-standard air quality. Paragraph 9.18 gives some guidance of what should be included in any air quality assessments, including reducing vehicular traffic levels. The PLA consider that this paragraph should specifically refer to encouraging the transportation of construction and waste materials via rail or river as part of any assessment.			Support for the policy is welcomed. Policy D.TR4: Sustainable transportation of freight, is included as a key policy link for policy D.ES2. In order to reduce duplication in the plan it is not considered necessary to duplicate the requirements of D.TR4 in this policy.
1142493		Berkeley Group	LP419	PART 3: POLICIES, 9.15 Paragraph Policy D.ES2: Air quality	No				D.ES2: Air quality Part 2 should be revised to ensure that AQIA is required for EIA developments rather than Major Developments. The requirement would be too onerous for all developments over 10 dwellings Soundness test: Revise to make deliverable and therefore effective	Yes		It is not considered that this change is necessary. The entire borough is an air quality management area, in large parts of the borough, the air quality breaches EU limits. The health impacts of poor air quality are such that improving it is a key strategic objective for the borough and Local Plan. It is considered that restricting air quality assessments to a very small number of developments would not deliver the air quality improvements needed in the borough.
1141890	Amanda Day		LP24	PART 3: POLICIES, 9.16 Paragraph	No	Positi vely prepa red			"particular focus will be placed on improving air quality, protecting users from the effects of poor air quality and protecting vulnerable uses, such as schools. Education uses covered under this policy are primary and secondary schools"LBTH is planning to locate a school on the Highway where monitors more than 50 metres away from the Highway at Cartwright Street have picked up readings of NO2 73<99 ug/m3 (WHO guideline 40ug/m3 (2010) PM10 40 ug/m3 (WHO guideline 20ug/m3) PM2.5 21 ug/m3 (WHO guideline 10ug/m3			Planning permission for the school on the London Dock site was granted using the existing Local Plan, not the draft Local Plan. This policy has been strengthened in the new plan so that the placing of schools to reduce their exposure to poor air quality can be considered during the development management process.
1053881	Sally Styles	C M A Planning Ltd	LP91	PART 3: POLICIES, 9.2 Paragraph	No	Justifi ed			D.ES3 (part 2) – Urban Green and Biodiversity Comment: As per previous comments made in respect of the Regulations 18 consultation in respect of Policy ES3 Part 2b (as was), the previous objections are maintained. As previously stated this requirement is too onerous for small major development. Suggested Amendment: Increase the threshold to strategic development.	Yes		This is the council's current policy, which was found sound and monitoring has not indicated any issues related to its implementation.

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1142186	Andrew Wood	Isle of Dogs NP Forum	LP134	PART 3: POLICIES, 9.29 Paragraph	No	Consistent with national policy			Is it sustainable to put so much development in an area that is due to flood once every 100 years?	Yes		It is recognised that a significant proportion of the borough is in flood zone 3a. Accordingly, the borough has followed the requirements of the national planning policy framework and planning policy guidance and undertaken a sequential and exceptions test which indicates why development can be located in these areas, providing they have undertaken all the required mitigation and flood defence requirements outlined in the Strategic Flood Risk Assessment.
1053309	Jane Wilkin	Environment Agency	LP261	PART 3: POLICIES, 9.30 Paragraph D.ES4: Flood risk	Yes		Thank you for consulting us on the above policy document. We have reviewed the plan and relevant evidence bases and find the plan to be positively prepared and sound in relation to the Environment Agency's remit. I attach our formal response form with some suggestions to strengthen and improve some aspects of the plan. Generally we are pleased that the majority of our comments have been taken on board and the policies are based on appropriate evidence base. We are pleased to see that the supporting text of DES4 highlights the Thames Estuary 2100 plan and recommendations. The plan would be strengthened by including the reference to the plan within the site allocations. (SEE COMMENTS IN			Yes		Support for the policies is welcomed.

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							LP259)					
635797	Greater London Authority		LP685	PART 3: POLICIES, 9.30 Paragraph Policy D.ES4: Flood risk	N/A			As stated in my previous letter, the requirement for a 16m buffer strip along a tidal river is overly restrictive. Care is required close to flood defence structures, in particular given that defences are likely to need to be raised during this century (as per Thames Estuary 2100). However, there is no specific requirement for a 16m setback. Many developments have already been developed in this zone, and the creation of such a development free zone, particularly within such an urbanised location as Tower Hamlets' river frontage is likely to result in inefficient use of land and river edge spaces.				The 16m strip is included in the policy at the request of the Environment Agency. The policy and supporting text (paragraph 9.36) recognises that this will not always be possible and highlights alternative flood mitigation which can be put in places where it is evidenced this is required.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP135	PART 3: POLICIES, 9.37 Paragraph	No	Effective			Other policies in this section refer to the need to consider the cumulative impact of development but not these two policies. We think all related policies should consider the cumulative impact of development given how close together some of these major developments are.	Yes		The Strategic Flood Risk Assessment (SFRA) which forms the evidence base for both policies considers the impact of development, including cumulative impact, on flood risk and suggests mitigations accordingly. This means that cumulative impacts have already been assessed and informed the policies.
1102564	Richard Hill	Thames Water Utilities Ltd	LP779	PART 3: POLICIES, 9.38 Paragraph Policy D.ES5: Sustainable drainage	No	Effective			Policy D.ES5 Sustainable Drainage We strongly support Policy D.E15 (Sustainable Drainage) We would however request that part 2 is amended to include foul water and not just surface water. We propose the following amendments; Major development is required to submit a drainage strategy which should demonstrate that both surface water and foul water will be controlled as near to its source as possible in line with the sustainable drainage systems hierarchy.			We do not think it is appropriate to include this suggestion within this policy. Sustainable drainage systems and accompanying policy are specifically designed to manage surface water discharge. Foul flows encompass a range of household activities and it would difficult to impose arbitrary limits or apply the drainage hierarchy - it would thus not be customary to be included as part of policy formulated to tackle surface water runoff. This is instead managed in policy D.ES6 which seeks to minimise pressure on the combined sewer network through implementation of systems such as greywater recycling. In addition, Thames Water have the prerogative to determine foul connection/rates while, as the Planning Authority, we have no statutory requirement to assess this.

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1053788	Steve Craddock	The Canal & River Trust	LP364	PART 3: POLICIES, 9.38 Paragraph Policy D.ES5: Sustainable drainage	N/A			The Council should note that drainage to public sewerage networks is not the only option open to developers when development occurs alongside the Trust's waterways. In many circumstances and subject to the Trust's agreement, surface water can be sustainably drained from developments into our waterways, thus reducing the pressure on mains drainage infrastructure. We would suggest that the supporting text to policy ES5 could encourage developers to actively consider such alternatives to increasing demand on the public sewerage network, including on the Isle of Dogs, which paragraph 9.38 suggests is a critical drainage area.				We have discussed this suggestion with Canal and River Trust and consider it to have potential negative environmental and biodiversity impacts. We do not think it appropriate for the plan to encourage such activities and will be for individual schemes to demonstrate its suitability.
1102564	Richard Hill	Thames Water Utilities Ltd	LP780	PART 3: POLICIES, 9.44 Paragraph Policy D.ES6: Sustainable water management	No	Effective			Policy D.ES6 Sustainable Water Management We support Policy D.ES6 and its supporting text, however in order to offer clarity we propose that the policy is titled 'Sustainable Water Management and Water and Waste Water Infrastructure. Alternatively the policy can be split so that part 1 forms its own policy.			We are happy to change the title of the policy to ensure clarity but will use a simpler amendment than suggested. It is important to note that sustainable in this context means environmentally sustainable but also sustainability in relation to infrastructure. proposed new name: Sustainable water use management and infrastructure
1142035		Hermes Property Unit Trust	LP162	PART 3: POLICIES, 9.44 Paragraph Policy D.ES6: Sustainable water management	Yes			Policy D.ES6. Sustainable water management As highlighted elsewhere, it would be helpful to define 'Major' development. Part 2 of the policy is not specify how all 'New' development will achieve this.		Yes		Major developments are already defined in the glossary. In order to ensure clarity on how the requirement should be delivered, the supporting text will be amended as following: Paragraph 9.42: In order to satisfy the requirements within parts 1 and 2, all major developments will be required to submit a drainage strategy alongside the original planning application. All other relevant developments will also be strongly encouraged to do so. <i>New paragraph 9.43</i> Surface water reduction and the required run-off rates should be achieved by following the sustainable urban drainage systems hierarchy, which is The sustainable urban drainage systems hierarchy is outlined in more detail in the London Plan.

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												Paragraph 9.44: Infiltration sustainable urban drainage systems techniques should only dispose of clean roof water into clean, uncontaminated ground. They should not be used for foul discharges or trade effluent, and may not be suitable within source protection zone 1 .
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP342	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No	Consistent with national policy			The policy should acknowledge that there may be practical considerations which militate against the CO2 emission reduction standards being met. Off-set financial contributions should only be sought where it is clear that the payment of such sums will not cause development to be stalled (NPPF paragraph 205).			The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
1142692	Cubitt Property Holdings Ltd		LP605	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No	Consistent with national policy			The policy should acknowledge that there may be practical considerations which militate against the CO2 emission reduction standards being met. Off-set financial contributions should only be sought where it is clear that the payment of such sums will not cause development to be stalled (NPPF paragraph 205).			The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
1033272	James Stevens	Home Builders Federation Ltd	LP815	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No	Consistent with national policy			The policy is unsound because it is contrary to national policy. The government has fixed Part L of the Building Regulations at its 2013 level. The government decided through its Productivity Plan of 10 July 2015 (Fixing the Foundations: creating a more prosperous nation; HM Treasury, 2015) not to proceed further with the zero carbon homes programme that was scheduled to come into force in 2016. The Council, however, is choosing to disregard this statement of national policy as has the Mayor of London through his current London Plan. The Council's Local Plan Viability Assessment demonstrates the cost implications of insisting on zero carbon homes and the difficulties this will create for achieving the 50% affordable housing target. Clearly viability negotiations will require the watering down of some policy objectives to come up with implementable schemes.			LBTH recognise that the Written Ministerial Statement (WMS) in 2015 changed the government's position in relation to zero carbon. It also indicated that the government would be commencing the requirements of the proposed amendments to the Planning and Energy Act 2008, as announced in the Deregulation Act 2015. This has yet to occur. It is understood that the council must have consideration of the WMS, but it does not outweigh local or regional policy. This was confirmed by the government during the debate on the Neighbourhood Planning Act in the Lords by Lord Bourne of Aberystwyth, Parliamentary Under-Secretary (Department for Communities and Local Government) (see Hansard 06.02.2017, volume 778, column 360). This policy maintains the council's current policy position and is inline with the

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												GLA's Housing SPG and draft London Plan (2017). The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
624580	Jason Larkin	Canary Wharf Group Plc	LP535	PART 3: POLICIES, 9.48 Paragraph Policy D.E57: A zero carbon borough	No	Positively prepared; Effective			We had previously commented on the equivalent Regulation 18 Consultation draft policy (policy ES6) and included representations prepared by our energy and sustainability consultants WSP. These representations still stand and are provided at Attachment 7: The viability of the achieving a 45% reduction in carbon emissions is heavily dependent on the efficiency of the heat source; the focus here being on CHP based district heating networks. The government has recently issued a consultation on revising SAP 2012, the dwelling Part L procedure for ensuring building regulation CO2 emissions compliance. The key headline is that the grid electricity CO2 emission factor is set to be reduced by 23% from the current value of 517 g/kWh to 399 g/kWh. This change reflects the rapidly decarbonising nature of our electrical grid. We expect this to reduce the carbon reduction achievable on a typical apartment heated from a CHP led district heating network from around 35% to 20%. This significantly impacts the ability of a residential dwelling to achieve a 45% reduction in CO2 emissions. While the benefit of using heat pumps will improve, these are not always a viable heating source for many residential buildings, particularly tall residential buildings. We would therefore suggest that for many building types a 45% reduction cannot be achieved on site without the use of offsetting. à The carbon performance of tall residential buildings is usually significantly impacted by the performance of the façade. The only viable way to clad very tall residential buildings is through a unitised curtain wall and inherently, these are less efficient than more traditional 'low rise' construction techniques. This can make achieving a 45% reduction in carbon emissions through on site means only very difficult. Clarification should be provided on the performance of the façade performance used in the calculations à For many buildings in urban environments, PV is the only viable way of reducing carbon emissions through renewable technologies. This is particularly the case where CHP led district			Carbon factors - The evidence base acknowledges the decarbonisation of the grid and its likely impact on the carbon content of heat sources. This is why it encourages applicants to not only take decisions based on carbon factors in SAP 2012 but also estimate the long term carbon implications of their decisions. As far as combined heat and power (CHP) is concerned, the impact of the decarbonisation of the grid is uncertain though as the government has not published a new methodology setting out which carbon factor should be used for 'electricity displaced by gas-fired CHP'. There is currently no consensus on which factor should be used although the average equivalent carbon content of electricity generated by gas-fired CCGT power stations appears to be the preferred approach. Tall buildings - Calculations undertaken as part of the evidence base illustrate that it can be more challenging for tall buildings to achieve a 45% improvement on site compared with medium and low rise typologies. However, it also highlights that the relative additional costs associated with achieving higher carbon reductions are lower than for other typologies. Finally, it highlights that standard/poor practice in terms of energy efficiency combined with standard higher carbon heating solutions make it difficult to achieve the required 45% target as space on the roof for PVs is limited. The aim of this policy is to encourage better standards and lower carbon solutions. The performance of 'standard' unitised systems cannot therefore be considered as robust

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								<p>heating networks are specified. The taller a building, the less impact that that PV can generally have on overall carbon emissions, as PV is typically mounted on the roof of a building. In many cases the impact of PV proves to be negligible, therefore taller buildings are more likely to require a carbon offsetting payment to be made in order to meet the 45% reduction on site target. We also note the requirement in draft policy SG1 (Sustainable Growth in Tower Hamlets) of the Regulation 18 consultation that non-residential development "is expected to meet at least BREEAM 'Excellent' rating" has now become "all new non-residential development...over 500 square metres floorspace (gross) must meet or exceed BREEAM 'excellent' rating" [our underlining]. This seemingly removes any flexibility to the application of BREEAM and does not acknowledge that in some instances there may be reasons that a certain BREEAM level cannot be reached. Surely the purpose of the policy is not to prevent developments that may bring many benefits but cannot meet a certain BREEAM level? We have found no new evidence to justify this further restriction on the application of BREEAM and the policy should be reverted to the Regulation 18 text</p>			<p>justification of a technical limit for the performance of tall buildings. However, if the application manages to successfully evidence and demonstrate to LBTH that the 45% CO2 reduction over Part L cannot be achieved on a particular building, LBTH may enable the shortfall to be achieved with a carbon offsetting contribution.</p> <p>Façade details – The study is transparent in the modelling inputs and development types assessed. This is presented in figure 4.08 which identifies the 'Standard', 'Good Practice' and 'Best Practice' Scenarios.</p> <p>We recognise that the BREEAM requirement should be altered. We propose the following amendment:</p> <p>2. Development is required to maximise energy efficiency based on the following standards:</p> <p>a. All new non-residential development and non-self-contained residential accommodation over 500 square metres floorspace (gross) must are expected to meet or exceed BREEAM 'excellent' rating.</p> <p>b. All major non-residential refurbishment of existing buildings and conversions over 500 square metres floorspace (gross) must are expected to meet at least or exceed BREEAM non-domestic refurbishment 'excellent' rating.</p> <p>c. As a minimum, all self-contained residential proposals will be strongly encouraged to meet the Home Quality Mark.</p> <p>Paragraph 9.53:</p> <p>In addition, developments are expected to meet should implement at least the minimum standards set out in BREEAM (Building Research Establishment Environmental Assessment Method) which applies to non-residential developments, residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes</p>

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												<p>measures for low carbon dioxide, sustainable materials, good air quality and natural daylight. We strongly encourage schemes to use the Home Quality Mark. Developments which are unable to meet these standards must provide evidence demonstrating the constraints and provide an alternative assessment against the requirements in the GLA's Sustainable Design and Construction Supplementary Planning Guidance. If BREEAM/Home Quality Mark/ Sustainable Design and Construction Supplementary Planning Guidance is replaced or amended during the lifetime of the plan, the equivalent replacement requirements will be applied, subject to discussion with our sustainability service.</p> <p>Add to the Evidence Links box:</p> <p>Sustainable Design and Construction Supplementary Planning Guidance (GLA, 2014</p>
1054252	Londone wcastle	Londone wcastle	LP628	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No	Consistent with national policy			The policy should acknowledge that there may be practical considerations which militate against the CO2 emission reduction standards being met. Off-set financial contributions should only be sought where it is clear that the payment of such sums will not cause development to be stalled (NPPF paragraph 205). As a result, we do not consider the draft plan to be consistent with national policy.			The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
1053788	Steve Craddock	The Canal & River Trust	LP367	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	N/A			We note that policy D.ES7 is "technology-neutral" in the way it sets expectations for developers to help contribute towards a zero-carbon borough. The Council will be aware that there is the potential for using water from the Trust's waterways (including the docks) for heating and cooling new developments. Our waterway network was included in the National Heat Map produced by the Department of Energy & Climate Change (now Department for Business, Energy & Industrial Strategy) and it provides an overview			The potential of this technology is acknowledged. The council has supported schemes using such technology in the past. However, we prefer to keep the policy 'technology neutral' so as to encourage the widest possible range of carbon-reduction solutions. In addition, we consider that the environmental impacts of such schemes need to be carefully assessed on a case by case basis.	

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								of the opportunity that exists in London. We estimate that there is approximately 45MW of heating and cooling potential in our London waterways, which could supply approximately 24,000 homes in London, if effectively utilised. The technology required to deliver cooling from canal and dock water is already successfully used in London. We suggest that this should be recognised in the supporting text to policy ES7.				
1142691		Alliance Property Asia	LP613	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No				POLICY D.ES7: A ZERO CARBON BOROUGH The policy should acknowledge that there may be practical considerations which militate against the CO2 emission reduction standards being met. Off-set financial contributions should only be sought where it is clear that the payment of such sums will not cause development to be stalled (NPPF paragraph 205). Note: No soundness test undertaken.	Yes		The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
1142493		Berkeley Group	LP421	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	No				D.ES7: A zero carbon borough The zero carbon agenda was dropped by the Government when the housing standards were introduced in 2015 in recognition of the considerable progress already made in energy efficiency, and the costs involved. The Government has also made clear that energy efficiency should be addressed through building regulations rather than planning policy. It is not technically feasible to achieve zero carbon so it is essentially a tax and must be considered in the context of other obligations on development including CIL and affordable housing Soundness test: Remove, not justified or deliverable (effective)	Yes		LBTH recognises that the Written Ministerial Statement (WMS) in 2015 changed the government's position in relation to zero carbon. It also indicated that the government would be commencing the requirements of the proposed amendments to the Planning and Energy Act 2008, as announced in the Deregulation Act 2015. This has yet to occur. It is understood that the council must have consideration of the WMS, but it does not outweigh local or regional policy. This was confirmed by the government during the debate on the Neighbourhood Planning Act in the Lords by Lord Bourne of Aberystwyth, Parliamentary Under-Secretary (Department for Communities and Local Government) (see Hansard 06.02.2017, volume 778, column 360). This policy maintains the council's current policy position and is in line with the GLA's Housing SPG and draft London Plan (2017). The viability and deliverability of the zero carbon requirements have been assessed in both the Tower Hamlets Carbon Policy Evidence Base and the Tower Hamlets Viability Assessment. This evidences that the policy - both the onsite requirements

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												and offsite payments - are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the Development Management process.
1142035		Hermes Property Unit Trust	LP163	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	Yes			Policy D. ES7: A zero carbon borough The Policy should reflect the emerging new London Plan. In addition, the policy should make provision.		Yes		Policy D.ES7 does reflect the emerging new London Plan policy. The GLA have confirmed they support the proposed policy. The only substantive difference is the percentage of on site carbon reduction required. The Tower Hamlets Carbon Policy Evidence Base (2016) outlines why we consider a higher onsite level is required and demonstrates it is deliverable.
635797	Greater London Authority		LP688	PART 3: POLICIES, 9.48 Paragraph Policy D.ES7: A zero carbon borough	Yes		The Mayor supports Tower Hamlets' proposed approach to achieving a zero carbon borough, including its proactive approach to implementing a carbon off-set fund.					Support is welcomed.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP136	PART 3: POLICIES, 9.63 Paragraph	No	Effective			Other policies in this section refer to the need to consider the cumulative impact of development but not this policy. We think all related policies should consider the cumulative impact of development given how close together some of these major developments are.	No		This comment appears to address policy D.ES8: contaminated land. It is unclear why or how considering the cumulative impact of development would be necessary for this policy. Developments must make any land they develop on safe before developing it. If surrounding uses impact the contamination of their land, this will be addressed in the site investigation and mitigated.
1105881	Michael Atkins	Port of London Authority	LP343	PART 3: POLICIES, 9.64 Paragraph Policy D.ES9: Noise and vibration	No				16. Policy D.ES9: Noise and vibration (page 153) The PLA consider that within this policy, under part 2 that refers to where new noise-sensitive land uses are proposed in proximity to existing noise generating uses, that safeguarded wharves are also included within this section. This recognises the need for adjacent development to safeguarded wharves to be designed in such a way to minimise noise and vibration impacts, to ensure there is no adverse affect on the safeguarded wharf operators.			The land use examples in the policy and not exhaustive and we will amend policy D.ES9 and supporting text (paragraph 9.69) to recognise this:2. Where new noise-sensitive land uses are proposed in proximity to existing noise-generating uses, such as cultural and entertainment venues, development is required to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures. Paragraph 9.69: There have been a number of examples across London of long-standing entertainment venues closing or becoming at risk of closure due to a combination of factors, including noise complaints from

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												new residents and venues being purchased for redevelopment (particularly for housing). This has implications for the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential. Part 2 uses the agent of change principle to seek to reduce this phenomenon. This principle may also apply to other noise-generating uses, such as industrial uses. Applicants must submit detailed noise assessments and demonstrate that noise levels within the proposed development emitted from nearby uses would be at an acceptable level. Where we are not satisfied that the operations of nearby uses would not be compromised, applications will be refused.
1142720	David Black	Leaside Regeneration	LP646	PART 3: POLICIES, Chapter 10: Managing our waste Policy S.MW1.	No	Justified; Effective			Policy S.MW1 , Part 1. Schedule 1 and Part 6. Schedule 3 is not effective and fails the soundness test by being incapable of implementation. In the specific cases of the Ailsa Street and the Clifford House, Towcester Road site allocations (Part 1 - Schedule 1), and the Empson Street area of search for new waste sites (Part 6 - Schedule 3), these locations are known to be unsuitable for the movement and transport requirements necessary to service a waste facility within the Borough. In addition, the effectiveness of these sites is compromised through their proximity to sensitive receptors including residential areas and schools which should preclude them from being included as existing sites, or potential sites for handling waste (reference Paragraph 10.15). To make the policy sound the wording of Policy S.MW1 , Schedule 1 should be amended to exclude reference to both Clifford House, Towcester Road and Ailsa Street as existing waste sites, and in Schedule 3, exclude Empson Street as one of the sites with in the search for new waste sites.			No change proposed All existing waste sites are safeguarded for waste use through London Plan policy 5.17G. Local Plans must be in general conformity with the London Plan. Removal of these sites from the Local Plan would result in non-conformity with the London Plan and it would fail the test of soundness Empson Street is a Strategic Industrial Location (SIL). This allocation means that the area is, in principle, suitable for waste uses. The London Plan identifies SILs as key locations for new waste facilities. Any application for a waste facility on an individual site within the Empson Street SIL will still be tested against the criteria set out in national, regional and local planning policies, including their impact on sensitive receptors. Local Plans must be in general conformity with the London Plan. The removal of this site from the Local Plan would result in non-conformity with the London Plan and it would fail the test of soundness.

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1142274	Manpreet Kanda	Royal Borough of Kensington & Chelsea	LP567	PART 3: POLICIES, Chapter 10: Managing our waste	N/A			RBKC is the Waste Planning Authority for this Borough and is part of the Western Riverside Waste Authority (WRWA) area. The other WRWA WPAs include Hammersmith and Fulham, Wandsworth, Lambeth and OPDC (for land which falls within Hammersmith and Fulham only). The Council is undertaking a Local Plan Partial Review (LPPR) which was submitted with supporting documents to the Secretary of State for Communities and Local Government for independent examination by the Planning Inspectorate in May this year. To inform the LPPR on waste the Council has prepared a joint Waste Technical Paper (WTP) with the Waste Planning Authorities within the Western Riverside Waste Authority (WRWA) area. The joint WTP provides evidence of the waste movements in and out of RBKC. There are no identified waste movements between RBKC and Tower Hamlet.				No objections have been raised therefore no changes required.
1131128	North London Waste Plan	North London Waste Plan	LP268	PART 3: POLICIES, Chapter 10: Managing our waste	Yes			I am writing to you on behalf of the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest (the "North London Boroughs") who are working together to prepare the North London Waste Plan (NLWP). The North London Boroughs have previously written to Tower Hamlets: in February 2016 on the first Local Plan consultation document; in July 2016 on waste movements between our areas; and in January 2017 on the Draft Local Plan. We are pleased that the Regulation 19 Plan responds to our comments made previously. In policy S.MW1: Managing our waste. the plan makes provision for the seven waste streams that waste planning authorities are required to plan for and demonstrates how the borough proposes to meet its apportionment. It also sets out a policy for the provision of compensatory provision for when a waste site is lost. The Waste Management Evidence Base Review 2017 is comprehensive and shows better appreciation of the London				No change required. The policies and evidence base are supported

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								Plan concept of waste managed in London than the previous study.				
1139582	Philip Smith		LP6	PART 3: POLICIES, 10.5 Paragraph	No	Effective			Can it be noted that the meaning of the last sentence of para 10.5 in 'Chapter 10: Managing our waste' is not as clear as it could be, and (though this may be my oversight) I haven't been able to locate Table 17 (Delivery and Monitoring Framework?) in Section 5? This information would be useful to understand how capacity will be monitored and what would be done if there was a loss of capacity.	Yes		Reference to the table is being deleted and wording amended as follows: We will continue to monitor the amount provision of land capable of providing new waste capacity over the course of the Local Plan period. Where loss of capacity occurs with the delivery of and monitoring framework set out in table 17 in section 5.
635797	Greater London Authority		LP689	PART 3: POLICIES, 10.5 Paragraph	N/A			In paragraph 10.5, the last two sentences could be made clearer and should be amended to read: "We will continue to monitor the amount provision of land capable of providing new waste capacity over the course of the plan period. Where any loss of capacity occurs with the delivery and monitoring framework set out in table 17 in section 5 ****NOTE - in sentence 1 of the quote 'provision' is struck out, as is the second sentence****				Proposed wording agreed. We will continue to monitor the amount provision of land capable of providing new waste capacity over the course of the Local Plan period. Where loss of capacity occurs with the delivery of and monitoring framework set out in table 17 in section 5.
1131502	Alex Richards		LP56	PART 3: POLICIES, Figure 17 : Waste hierarchy	Yes				I represent the owner of a section of the Highway Site they intend to develop it for residential and employment purposes. The allocation as a site for potential waste disposal should be removed.	Yes		No change proposed. The site is an area of search due to the Local Industrial Location designation and waste uses are in principle acceptable in such locations. Being within an area of search does not necessarily prohibit the development of other uses. Any development would need to be subject to policies addressing amenity and environmental impacts along with other relevant policies in the Local Plan.

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1054603	Ailsa Wharf Developments Ltd	Ailsa Wharf Developments Ltd	LP739	PART 3: POLICIES, 10.14 Paragraph Policy S.MW1: Managing our waste	No	Positively prepared; Justified; Effective			As detailed in the representations below, Ailsa Wharf Developments Ltd strongly supports housing growth in the Lower Lea Valley and particularly within the Poplar Housing Zone and therefore strongly objects to the safeguarding of the former waste site on Ailsa Street, particularly given the changed context of the area and its status as a Housing Zone, and the potential conflict between operating a waste site within the Housing Zone and maximising housing development in order to meet the Council's target of providing an additional 54.455 residential units within Tower Hamlets during the period up to 2031. The draft local plan (December 2015) in relation to 'safeguarding sites' stated that "many of the borough's safeguarded waste sites are in designated areas for future housing growth in the London plan" including the identified Poplar Riverside Zone and that "the new Local Plan will need to take account of these competing pressures and responsibilities."The draft local plan (November 2016) then specifically stated at paragraph 4.9.9-4 that the waste safeguarding should be removed for Ailsa Street on the basis of the site not being suitable on operational and deliverability grounds. Moreover, paragraph 4.9.9.5 of the November 2016 draft local plan recognised that the site no longer had an Environment Agency waste licence and was one of ten sites located within the Poplar Riverside Housing Zone which has been specifically identified as contributing to the Borough's 15 year housing land supply. The removal of the waste site designation for Ailsa Street was also based on the 2016 Waste Management Evidence Review which forms part of the Local Plan Evidence Base. Following a review of a potential 17 sites, the report identified five sites and four areas of search for inclusion in the local plan and confirmed the removal of Ailsa Street. Comments on Policies and Site Allocations Policy S.MW1: Managing our Waste Ailsa Wharf Developments Ltd strongly objects to Policy S.MW1 which states: 1 The following existing waste sites within Tower Hamlets (as shown on the Policies Map) are safeguarded for waste over the plan period. The supporting text at paragraph 10.3 notes that the Local Plan must identify sufficient opportunities to meet the identified needs of an area for the management of waste and notes that the London Plan requires boroughs to identify existing facilities and suitable land to provide enough capacity. Paragraph 10.5 then notes that between 3.65 and 5.27 hectares of land is required to meet the capacity gap up to 2036 and that it is estimated that 5.28 hectares of land will come forward within the areas of search for new waste sites. Moreover, the plan states "the borough is not allocating individual sites for waste but identifying areas within which individual sites could come forward; this approach is supported by both	Yes		Support for housing growth in the Lower Lea Valley noted. Objection to safeguarding the former waste site is noted, however all existing waste sites are safeguarded for waste use through London Plan policy 5.17G. Local Plans/Waste Plans must be in general conformity with the London Plan; therefore, the site has been safeguarded on this basis. Paragraph 10.17 acknowledges that some existing waste sites, including Ailsa Street, are within areas of regeneration. The policy does not restrict the redevelopment of this site, but requires developers to meet the requirements set out within policy S.MW1 part 4. The 2017 Waste Management Evidence Base reviewed the 2016 Evidence Base and made amendments accordingly. The 2017 Waste management Evidence Base used a lower throughput ranging from 45,000 and 60,000 tonnes per annum, compared to the 2016 evidence base which assumed a throughput 80,000 tonnes per annum. This meant that more land (a total of 5.27 hectares) need to be identified to potentially accommodate waste uses. In light of this requirement Ailsa Street has continued to be safeguarded. Moreover, as stated above, the London Plan seeks to protect safeguarded waste sites. The deliverability of a waste use on any appropriate site is largely driven by market conditions. Whilst ownership is a factor in deliverability, however the land is still required to be safeguarded as per London Plan Policy 5.17. The policy is flexible enough to enable other uses on the site as long as compensatory capacity is provided. With regards to accessibility larger vehicles are currently accessing the site and further details of vehicle movements and access would be assessed at the planning application stage but is not considered prohibitive to safeguarding the site. The fact that an application was not submitted subsequent to the 2009 screening opinion does not mean that the site should not be safeguarded for waste

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									<p>national policy and the waste industry". The inclusion of the Ailsa Street site as a safeguarded waste site is not considered appropriate and Ailsa Wharf Developments Ltd considers that Policy S.MW1: Managing our Waste as currently drafted does not meet the Tests of Soundness set out in the NPPF for the following reasons: 1 Designation of Ailsa Street as a safeguarded waste site is contrary to the designation of the Housing Zone within which it is located; 2 The proposed designation will be contrary to the Council's policy to deliver 58,965 new homes during the plan period, with an emphasis on providing these within the Housing Zone and Opportunity Areas; 3 Policy S.MW1: Managing our Waste does not accord with the previously drafted waste policy ES7 which removed Ailsa Street as a safeguarded waste site; 4 The proposed waste sites put forward in Policy S.MW1 do not reflect the 2016 Waste Evidence Base which forms part of the local plan review; and 5 The deliverability of the Ailsa Street site as a waste site is not guaranteed due to current site ownership and the future intentions of land owners. It is too small in itself to make any meaningful future contribution to waste management. Poplar Riverside Housing Zone Ailsa Wharf Developments Ltd considers that the retention of the safeguarding for Ailsa Street contradicts the designation of the area as the Poplar Riverside Housing Zone, is contrary to political support for residential development in the Housing Zone and could limit the development of housing in its immediate vicinity of the site due to the potential impacts on residential amenity such as noise, air quality and increased traffic/lorry movements. The removal of the safeguarding would enable the delivery of much needed additional housing within the Housing Zone and would also take into account the recent changes in the wider Lower Lea Valley Opportunity Area and the Vision for the area to be the focus of significant comprehensive regeneration and the development of new communities in the future. The securing of alternative sites which were identified in the 2016 Waste Evidence report would allow existing designated sites within the Housing Zone to be used for a more appropriate housing use, reflecting the change in the site's context since its previous designation. Meeting Housing Need Safeguarding the Ailsa Street former waste site for waste management would mean that it would be unable to contribute towards the Council's housing targets. Paragraph 4.1 of Tower Hamlets Local Plan consultation document (October 2017) sets out the policy requirement to maximise the supply of housing in the borough to meet both local and strategic needs. Table 1 (page 62) sets out the minimum requirement for additional housing in the period 2016 to 2031 which is 54A55</p>			<p>purposes.</p>

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									<p>units for Tower Hamlets as a whole, with 5,395 within the Lower Lea Valley, based on the estimated capacity of the site allocations. Paragraph 4.3 then recognises, however, that the London Plan ten year target, plus the annual rolled forward target, results in a housing supply target for the borough (2016-2031) of 58,965 homes. This is reiterated in Policy S.H1: Meeting Housing Needs and is also addressed by Policy S.SG1: Areas of growth and opportunity within Tower Hamlets which states that new developments will be directed towards opportunity areas including Lower Lea Valley and South Poplar. Development of the Ailsa Street site for housing could contribute towards the Council's housing target. Non-compliance with previous drafted Waste Policy Policy S.MW1: Managing our Waste does not accord with the previously drafted Policy ES7 of the Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits (November 2016) which stated that the Council would support the management of the borough's waste through a number of measures including (d) releasing safeguarded or allocated waste sites where the transfer of capacity does not undermine strategic policy and objectives. Table 8 of draft Policy ES7 identified two suitable sites within Tower Hamlets for waste management: Clifford House, Towcester Road and Northumberland Wharf, Yabsley Street, which combined provided i.34 hectares or 53,000 tpa. Table 9 then identified three additional sites within the LLDC area of Tower Hamlets which are suitable for safeguarding and allocation: Iceland Metal Recycling, land at Wick Lane and 455 Wick Lane, amounting to i.60 hectare and a capacity of 128,000 tpa. Table 10 then identified a further four additional sites for further consideration - the Highway Local Industrial Location, Empson Street Strategic Industrial Location, Bow Midlands West Rail Site and Fish Island Strategic Industrial Location, amounting to 25.15 hectares. On this basis and as noted above paragraph 4.9.9-4 of the draft Local Plan (November 2016) then confirmed that following the preparation of the Borough's waste evidence base, Ailsa Street has been identified as one of three existing safeguarded sites not deemed suitable for continued safeguarding for operational and deliverability reasons. Paragraph 4.9.9.5 then notes that the Ailsa Street site no longer has an Environment Agency waste licence and that the site is one of ten sites located within the Poplar Riverside Housing Zone, which has been specifically identified as contributing to the Borough's 15 year housing land supply. Waste Management Evidence Base The retained safeguarding of the former Ailsa Street waste site is contrary to previous evidence provided as part of the Local Plan Review which excluded Ailsa Street. LBTH Waste Management</p>			

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									<p>Evidence Base. 2016 The Waste Management Assessment (October 2016) undertaken by BBP Consulting LLP with Land Use Consultants forms part of the Evidence Base for the local plan and was based on existing permitted waste management facilities; existing safeguarded waste management facilities; existing policy allocations for Industrial areas/sites; and sites proposed for investigation by LLDC based on local knowledge. At Stage 1 of the process, 17 sites were identified, of which nine passed the initial screening based on size. At Stage 2, the sites were assessed for their fit with strategic policy and availability. At this point, sites within the Housing Zone, including Gillender Street (Ailsa Street) were dropped, due to their allocation for housing and employment. At Stage 3, five short listed sites suitable for allocation as waste sites (across LBTH including LLDC) were identified, representing a total land area of 2.94ha. These comprised Clifford House, Towcester Road and Northumberland Wharf within Tower Hamlets and 455 Wick Lane, 7 Iceland Wharf, Iceland Road and 16 Land at Wick Lane, Fish Island within LLDC. The Assessment also identified four areas of search to increase flexibility: The Highway and Empson Street within Tower Hamlets and Fish Island and 17 Bow Midland Depot within LLDC. Waste Management Evidence Base Review 2017 The Waste Management Evidence Base Review 2017 produced by Anthesis Consulting Group PLC was undertaken to update the 2016 Evidence Base. Table 1 of the report identified the existing gap between LBTH's apportionment target, the capacity of the existing operational waste sites and the capacity which would be provided. The report identified nine waste sites within Tower Hamlets (Table 4), which now included 40 Gillender Street (referred to as Ailsa Street). Ailsa Wharf Developments Ltd considers that this is inconsistent with the previous Evidence Review undertaken in 2016 and in particular objects to the specific references in the Evidence Base to the Ailsa Street site being brought back into use as a waste transfer site as this does not take into account the site ownership, its size and the fact that it has not been operational for five years. Paragraph ES3-7 of the 2017 Evidence Base acknowledges that Ailsa Street" is currently being used as a vehicle depot by Veolia and is therefore not currently an operational waste site." In addition, Table 4 notes that Ailsa Street "no longer has an environmental permit and (is) not currently operating as a waste site". The reference in Table 4 to "Veolia suggest that they may wish to bring it back into use as a transfer station and that (it) was an operational waste facility in recent past (2012)" is not appropriate and does not take account of the site's ownership, the fact that Veolia no longer has a lease for the site and</p>			

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									<p>that it is five years since any form of waste activity was carried out on the site. Ailsa Wharf Developments Ltd also objects to the reference at Paragraph ES3-7 which states " However, WDI shows that as recently as 2012, the whole site was used as a transfer station and received 32,160 tonnes. This site will continue to be safeguarded for waste use, and it is estimated that between 23,850 - 34,450 tpa could be managed on this site". Deliverability of the site It is questionable whether the site could be delivered as a viable waste site. The Ailsa Street former waste site is in private ownership and has not been used for waste operations since 2012. At only 0.5 hectares it is too small for most waste treatment operations. In addition, there are inadequate access arrangements for larger lorries. An online search of the Council's records found that the most recent planning permission was for a Waste Transfer Station, which was granted permission in 1988 for a temporary period and that a subsequent application in 1999 to extend the time of the temporary permission was never approved. In 2009 a Screening Request (ref. PA/09/00420) was submitted to the Council by Veolia Environmental Services Ltd seeking confirmation that an application to extend the time of temporary use for a further 2/3 years would not constitute EIA development. The accompanying Screening Report stated that: "As a result of impending proposals to now bring forward the site for redevelopment within the next 2/3 years, the Council now seek a retrospective planning consent for the retention of the use for a continued temporary period of time to coincide with the Council's and Development Corporation's redevelopment timescales."However no records of any subsequent application have been identified and there does not therefore appear to be a current permission for use of the site as a waste facility. As noted above, the Waste Transfer Station site ceased operation in 2012 and the site has subsequently been used by Veolia for offices and parking. We understand that this lease to Veolia has now expired. The previous waste transfer licence for the site was for 182,000 tonnes, but the last throughput was only 32,000 tonnes per year. Records show that the waste received in 2010 was 55,639; in 2011 32,418; and in 2012 32,161 which is well below the licence agreement (approximately 17.7% in 2012). Delivering Sustainable Places Lower Lea Valley Ailsa Wharf Developments Ltd supports the Vision for the Lower Lea Valley which by 2031 "will experience comprehensive regeneration and redevelopment of former and underused industrial areas". The Company considers that this reflects the recent changes in the Lower Lea Valley, including new development along the River Lea and the A12 corridor and acknowledges</p>			

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									<p>that the land use and townscape is changing significantly with additional new housing. Ailsa Street Site Allocation Ailsa Wharf Developments Ltd strongly supports the allocation of Ailsa Street as a site suitable for housing and employment. However, the Company strongly objects to the retention of the safeguarded waste site within the land use requirements, as this is contrary to the previous site allocation for Ailsa Street (November 2016) which stated "allocation of the site (5.76 hectares) as appropriate for comprehensive development to include housing, open space and employment". The Ailsa Street Development Framework (January 2016) which forms part of the Local Plan Evidence Base and provides a Vision for how the area could develop over the next 10-15 years notes that "the area covered by the Ailsa Street Development Framework is a place with potential to create a high quality sustainable neighbourhood. It occupies a strategic position between established communities in the Lower Lea Valley and has a central location in the Poplar Riverside Housing Zone."The Framework also recognises that "there is a significant opportunity to maximise the potential of the area in terms of the diversity of uses, its sustainability contribution and the quality of the urban design and built environment" and notes that "the Poplar Riverside Housing Zone has been identified as having substantial potential to unlock and accelerate housing delivery in London, through targeted investment, engagement and planning and that the Poplar Riverside Housing Zone will play an important role in ensuring housing supply rates in the borough are accelerated to support population growth". Ailsa Wharf Developments Ltd therefore considers that the allocation of part of the Ailsa Street site as a waste site is inappropriate and would be contrary to the Council's objectives to maximise housing within the Poplar Riverside Housing Zone. Conclusions As drafted, Policy S.MW 1: Managing our Waste and the allocation of the Ails a Street waste site as a retained waste site will not assist in meeting the Borough's housing targets and the policy and site allocation fail the test of soundness: positively prepared. Policy S.MW1 also fails the Test of Soundness: Justified. The retention of the safeguarding is contrary to the 2016 Evidence Base which suggested that the site should be removed from safeguarding; and whilst the 2017 Evidence suggests that it should be reintroduced, there are alternative sites (as identified through the detailed three stage assessment in the 2016 Evidence) which are more appropriate. Policy S.MW1: Managing our Waste and the retention of the safeguarded waste site within the Site Allocation cannot be delivered over the plan period due to the site's ownership and size and the policy fails the test of Soundness: Effective.</p>			

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									The inclusion of the retention of the safeguarded waste site within the proposed land uses for the Ailsa Street Site Allocation does not meet the test of soundness and for the reasons set out in this letter, the Site Allocation fails the test of Soundness positively prepared, justified and effective. In order to make the draft local plan sound, Ailsa Wharf Developments Ltd considers that the safeguarding of the former Ailsa Street waste site should be removed. Reference to Ailsa Street as an existing waste site should be deleted from Schedule 1: Existing waste sites in Tower Hamlets of Policy S.MW1: Managing Our Waste as the site is not currently operational and for the reasons set out in the letter from Lichfields dated 13 November 2017 is not considered appropriate for this use. In addition, reference to "retention of the safeguarded waste site" in the Land Use requirements for Ailsa Street (page 211) should be deleted.			
1105881	Michael Atkins	Port of London Authority	LP345	PART 3: POLICIES, 10.14 Paragraph Policy S.MW1: Managing our waste	Yes		17. Policy S.MW1: Managing our waste (page 159) The PLA support policy S.MW1 on managing waste and the inclusion of the safeguarded Northumberland wharf as a safeguarded waste site.					Policy supported. No change required.
1142150	Tim Gaskell	Landowner Consortium and Aitch Group	LP83	PART 3: POLICIES, 10.14 Paragraph Policy S.MW1: Managing our waste	No	Justified			<p>We are writing with regards to the draft LBTH Local Plan which is currently the subject of public consultation and wish to make representations with regards to the above site, as set out below. In summary, we object to the Strategic Industrial Location and the Waste Safeguarding. We consider the area should have a site allocation to bring forward a mixed use redevelopment.</p> <p>The Position Today The site lies within the London Borough of Tower Hamlets. The buildings on the site are predominantly two/three storey industrial units. The 10 ha site comprises three distinct areas: · warehousing/distribution units on St Andrews Way; · older industrial stock behind Empson Street; and · smaller storage/distribution units and an arts centre on Towcester Road. In total, the site contains approximately 44,000 sqm of commercial floorspace. Immediately adjacent the north-west corner of the</p>	Yes		<p>All existing waste sites are safeguarded for waste use through London Plan policy 5.17G. Removal of this site from the safeguarding allocation would result in non-conformity with the London Plan and it would fail the test of soundness. It has been noted that there are no plans to change the use of the site however it should still be safeguarded in accordance with London Plan policies.</p> <p>Paragraph 10.17 acknowledges that some existing waste sites are within areas of regeneration. The policy does not restrict the redevelopment of this site, but requires developers to meet the requirements set out within policy S.MW1 (part 4).</p> <p>Policy MW1.4 states that if sites are redeveloped for another use, the capacity will need to be replaced locally. Capacity is the maximum annual throughput that the existing site can achieve. This policy means</p>

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									<p>Site is Devons Road DLR Station, beyond which a residential development (by Peabody) is under construction. Bromleyby-Bow Underground station is approximately a 250m walk to the north and Bow Road Underground Station is approximately 500m north-west. As such, the site is well connected by public transport.</p> <p>The surrounding area is characterised by a mix of uses, but mostly residential, with homes and flats located to the north, south and west. The only exception is a small element of the site which fronts onto the A12. The site also has a long frontage to the Limehouse Cut canal.</p> <p>The site also has access to the A12 via Devas Street to the north, however, this access goes through a residential area.</p> <p>The Site does not contain any listed buildings or locally listed buildings, or trees subject to Preservation Orders.approximately 500m north-west. As such, the site is well connected by public transport.</p> <p>The surrounding area is characterised by a mix of uses, but mostly residential, with homes and flats located to the north, south and west. The only exception is a small element of the site which fronts onto the A12. The site also has a long frontage to the Limehouse Cut canal.</p> <p>The site also has access to the A12 via Devas Street to the north, however, this access goes through a residential area.</p> <p>The Site does not contain any listed buildings or locally listed buildings, or trees subject to Preservation Orders.</p> <p>Planning Policy – Draft In the draft Tower Hamlets Local Plan, the site has the following designations:</p> <ul style="list-style-type: none"> • Strategic Industrial Location (SIL); • Safeguarded Waste Site (a small area in the middle part of the Site); and • Site or area suitable for waste management (applies to the whole Site). <p>Waste Management Use A small part of the wider site remains designated as a Safeguard Waste site in the draft Local Plan (Policy S.MW1), although it is acknowledged that this area has been reduced from the previous version and now just relates to a small parcel some 0.144 ha in size). As set out previously, this part of the site is owned and operated by Clifford Devlin, who in summary, are a demolition business. They carry out all types of demolition involving medium-rise office blocks to schools, hospitals, cinemas, infrastructure projects and residential accommodation. They also have a Building and Special Works division which offers a</p>			<p>that redevelopment of waste sites is not restricted, but that waste capacity, which is very limited in the borough, is preserved.</p> <p>The SIL (Strategic Industrial Location) and Housing Zone designations are both set by the GLA. Any uses within these areas will need to ensure that they satisfy relevant policies.</p> <p>Empson Street is a SIL and this allocation means that the area is, in principle, suitable for waste uses. The London Plan identifies SILs as key locations for new waste facilities. Any application for a waste facility on an individual site within the SIL will still be tested against the criteria set out in national, regional and local planning policies, including their impact on sensitive receptors.</p>

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									<p>comprehensive range of building services from structural alterations to concrete and builders trade packages to support complex refurbishment and renovation projects. Finally there is a Licensed Asbestos Division which provides removal, disposal and management planning services to assist dutyholders with their responsibilities under the Control of Asbestos Regulations 2012. The site supports these activities and is generally used for the storage of machines and equipment which support demolition activities.</p> <p>As part of the Licensed Asbestos Division, Clifford Devlin operates its own asbestos waste transfer station which is licensed by the Environment Agency (Permit No. 80134) for managing the disposal of asbestos containing material. The facility is capable of processing up to 32 cubic metres of asbestos waste on a daily basis and can be used by clients who require immediate disposal of damaged or fly-tipped asbestos containing material.</p> <p>The waste operations relates to this Asbestos work only, and only as part of the wider demolition work carried out by the company. It is worth noting the Asbestos licence was only applied for due to a specific project requirement. It is also a very small quantity as well.</p> <p>Clearly some waste disposal takes place at this site, but it is not considered a waste site in itself, as that activity is ancillary to the main demolition business. There are no proposals or plans to change this in the future. Clifford Devlin operates and run their business effectively from this site and would strongly resist any proposals which forced them to change their business or relocate. Furthermore, the owner occupier has sublet a number of the buildings on site as offices to local businesses, which makes any change harder to do, even if it was felt to be desirable.</p> <p>For the same reason, we also object to the wider area being included as an area of search for new waste sites in Tower Hamlets.</p> <p>We understand that waste management is a pressing strategic issue and the Borough is working towards achieving net self-sufficiency by 2026. Whilst we do not disagree with this, we must highlight that this site is not a waste site, and has no plans to become one. As such, identifying this site for waste management and the wider site as an area of search is flawed and would result in an unsound Local Plan.</p> <p>The NPPF says Local Plans should be aspirational but realistic. This allocation would fail this requirement. It also says Local Plans should be deliverable over its period, again, something which would not be achieved. Given this, we cannot see how you could demonstrate to the Planning Inspector that we have identified sufficient land for the management of</p>			

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									<p>waste.</p> <p>We would suggest the other seven sites set out in the Local Plan are examined for these specific designations.</p> <p>The Future Given the above, it would seem sensible to review current uses of the site and consider how the uses may be accommodated on a mixed use site, for example through size zoning and densification. This would enable it to be demonstrated that industrial, and potentially some compatible waste management could be combined with residential uses at the Site. By way of example, Aitch are delivering a scheme nearby, The Island site on Rothbury Road in Hackney Wick. Permission was obtained for 181 homes (which included affordable provision) and 5900 sqm of commercial floorspace on a 0.8 ha site. Here are some images of the scheme. The commercial space was split over the site, some mixed with the residential uses, but also some in stand-alone commercial blocks. If these ratios were factored up to a 10ha site, it would equal 2260 homes and 73,750 sqm of commercial. The commercial could be mixed with the residential, or as with the Island site, could be developed in its own 'commercial quarter'.</p> <p>The existing floorspace on site is around 44,000 sqm, so these show that commercial levels could be increased by 70% and over 2000 homes provided. Or alternatively, commercial levels could be maintained and other benefits provided, such as a higher level of affordable homes, or community facilities such as a new primary school. Even if commercial space is maintained at current levels, it is envisaged that job numbers would increase significantly due to the provision of newer, better quality buildings. This could result in a development as shown below.</p> <p>We consider that this wider area should be included as a Site Allocation for mixed use redevelopment.</p>			
635342	Aggregate Industries UK Limited		LP491	PART 3: POLICIES, 10.14 Paragraph Policy S.MW1: Managing our waste	No	Effective; Consistent with national policy			It is noted that the Bow West site is included in its entirety in a larger area identified as "Fish Island" which is allocated as an "Area of search for new waste sites in LLDC". Whilst there is no objection in principle to this designation, to assist in LBTH planning for future supply of land suitable for waste uses it is confirmed that as things currently stand there is very limited prospect that any land within the safeguarded Bow West site will become available in the Local Plan period to accommodate any meaningful level of waste activities.	Yes		Comment noted. Fish Island is a Strategic Industrial Location (SIL). This allocation means that the area is, in principle, suitable for waste uses. The London Plan identifies SILs as key locations for new waste facilities and borough Plans must be in general conformity with the London Plan. Any application for a waste facility on an individual site within the Fish Island SIL will still be tested against the criteria set out in national, regional and LLDC local planning policies.

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635711	London Concrete Ltd		LP492	PART 3: POLICIES, 10.14 Paragraph Policy S.MW1: Managing our waste	No	Effective; Consistent with national policy			It is noted that the Bow West site is included in its entirety in a larger area identified as "Fish Island" which is allocated as an "Area of search for new waste sites in LLDC". Whilst there is no objection in principle to this designation, to assist in LBTH planning for future supply of land suitable for waste uses it is confirmed that as things currently stand there is very limited prospect that any land within the safeguarded Bow West site will become available in the Local Plan period to accommodate any meaningful level of waste activities.	Yes		Comment noted. Fish Island is a Strategic Industrial Location (SIL). This allocation means that the area is, in principle, suitable for waste uses. The London Plan identifies SILs as key locations for new waste facilities and borough Plans must be in general conformity with the London Plan. Any application for a waste facility on an individual site within the Fish Island SIL will still be tested against the criteria set out in national, regional and LLDC local planning policies.
1105881	Michael Atkins	Port of London Authority	LP348	PART 3: POLICIES, 10.26 Paragraph Policy D.MW2: New and enhanced waste facilities	Yes		18. Policy D.MW2: New and enhanced waste facilities (page 162) The PLA support policy D.MW2 on new and enhanced waste facilities, particularly part f and paragraph 10.30 which refers to supporting facilities that have good access to the strategic transport network, including where possible rail and canal/river links that offer the potential to transport waste.					Policy supported. No change required.
1142661	Abdul Basit		LP555	PART 3: POLICIES, 10.33 Paragraph Policy D.MW3: Waste collection facilities in new development	N/A			We do not believe that even recent developments waste collection facilities are adequate and require innovative ways of recycling all waste products and find ways of reducing labour intensive recycling Also they need to be easy to access for elders				Part 2 of Policy D.MW3 requires major developments to incorporate non-traditional waste collection facilities which include innovative waste management systems such as underground refuse systems. In order to address the issue raised about ensuring accessibility the following wording will be amended in Part 1 of the policy: All new development must include sufficient accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole."

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1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP656	PART 3: POLICIES, 10.33 Paragraph Policy D.MW3: Waste collection facilities in new development	N/A			Policy D.MW3: Waste collection facilities in new development We do not believe that even recent developments waste collection facilities are adequate and require innovative ways of recycling all waste products and find ways of reducing labour intensive recycling		Yes		Part 2 of Policy D.MW3 requires major developments to incorporate non-traditional waste collection facilities which include innovative waste management systems such as underground refuse systems. In order to address the issue raised about ensuring accessibility the following wording will be amended in Part 1 of the policy All new development must include sufficient accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole."
635414	City of London		LP577	PART 3: POLICIES, 10.33 Paragraph Policy D.MW3: Waste collection facilities in new development	N/A			As a central London authority and Waste Planning Authority, the City Corporation faces similar waste planning challenges to Tower Hamlets in that land values and pressure for other uses make the provision of waste sites within the City problematic. Given the constraints on the likely provision of additional waste facilities, it is important that every effort is made to reduce the volume of waste generated during the construction and operational phases of development. Waste minimisation should be encouraged for commercial as well as residential developments.				Tower Hamlets agree that, like the City of London, there are pressures faced for waste sites to be used for other purposes due to high land values In order to assist in reducing the volume of waste generated policy S.MW1.8 seeks to ensure that construction, demolition and excavated materials are recycled on or close to the site. In addition waste minimisation is addressed in policy D.MW3 which requires sufficient space to separate and store dry recyclables within individual units and the building as a whole.
1142668	James Armitage		LP562	PART 3: POLICIES, Chapter 11: Improving connectivity and travel choice	N/A			Chapter 11- Improving connectivity and travel choice In general I welcome the travel issues being raised, but on residential developments I think there has to be increased provision for servicing. While residents can in most cases use public transport/cycling/walking for everyday travel, a home cannot be serviced without regular vehicle visits. So while I note that the parking standards for residents in high-rise developments may be zero, there are daily often multiple visits by grocery delivery vans, and regular requirements for trades (plumber, electrician, plasterer or decorator, locksmith etc.). If the streets are not to be further clogged up with vehicles on the kerb, there must be servicing parking with all new residential development. This also highlights a matter not addressed, the limited				The need for adequate servicing and delivery facilities within new developments is recognised in the Local Plan, as well as the potential impact on highway congestion if this issue is not managed properly. As a result, policy D.TR4 (part b) seeks to ensure that the delivery of goods and servicing will be provided within the site curtilage in order to minimise impact to the highway. Regarding highway congestion, this is a key issue recognised in the Local Plan which is why it sets out the need to facilitate significant modal shift towards more sustainable forms of transport.

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								access and egress for vehicles on the Isle of Dogs. There must be at least a desired scheme in the plan to improve/expand the capacity of the two choke points that regularly back up and then clog all roads at the north end of the isle. To take 2 hours to drive off the island, which I have had to suffer is unacceptable. One accident should not have such an effect.				
1053788	Steve Craddock	The Canal & River Trust	LP369	PART 3: POLICIES, 11.1 Paragraph	N/A			We welcome the Council's support for ensuring development prioritises the needs of pedestrians, cyclists and access to public transport. The towpaths of the Blue Ribbon Network already provide a network of attractive and car-free routes that support sustainable journeys across the borough and its neighbours. However, new development will undoubtedly place increased pressure on this network and improvements may be required to ensure that its full potential is realised. We note that the Infrastructure Delivery Plan includes borough-wide Green Grid projects that will be funded through CIL, the vision of which is to create an interlinked network of high quality, multifunctional, accessible, 'green' open spaces and waterways in Tower Hamlets. We would welcome further discussions with the Council about how improvements to our waterways, towpaths and docksides could contribute to this, including the potential for improvements to the Limehouse Cut towpath (for which we have attached draft proposals for works), Docklands and the development of a Lee Valley Quietway.			Comment and support noted.	

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1142985	Transport for London (TfL)	Transport For London	LP732	PART 3: POLICIES, 11.1 Paragraph	N/A			<p>Building on the point raised for 3.1, and as highlighted within previous correspondence on the Plan, these statements need to be supported directly with evidence, analysis and data. It is currently unclear and confusing as to what this is referring to on the transport network. What are "planned improvements" and what is "further investment" is not clearly identified. Section 11.14 lists a number of interventions, though it isn't clear if they are the former or the latter. With ref to section 3.1, the boxed text states that "a significant step-change in future capacity is required" though it isn't clear what this is additional to - only that planned/under way projects include Elizabeth line and improvements to LU (Central, Jubilee), DLR and river services (and additional river crossings).</p>				<p>Comments noted. All policy and supporting text is supported by evidence as set out in the Strategic Transport Assessment. Further clarification will be provided in relation to planned improvements and further infrastructure that is needed.</p> <p>Paragraph 11.14:</p> <p>We will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough. The list below sets out a number of planned interventions (see figure 18) that are required to support the borough's transport network, including (79):</p> <p>Insert the following after paragraph 3.1:</p> <p>Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages) .</p> <p>Multiple projects are also underway or planned to improve the public transport network across the borough, including the new Elizabeth line, improvements to the London Underground (e.g. Central and Jubilee lines) and Docklands Light Railway, improved river services and additional river crossings. However, Even with these capacity increases, future demand is forecast to outstrip supply over the plan period, Consequently, a and further investment significant step change in future capacity is will be required above that already planned. Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages).</p>
1142186	Andrew Wood	Isle of Dogs NP Forum	LP145	PART 3: POLICIES, 11.4 Paragraph	No	Effective			Other policies refer to the need to consider the cumulative impact of development but not this policy. We think all related policies should consider the cumulative impact of development given how close together some of these major developments are.			<p>Comment noted. Paragraph 11/16 has now been updated to reflect the 'cumulative' impact of development.</p> <p>This policy seeks to address the impact that development has on the transport network (both individually and cumulatively), particularly issues of congestion, air quality, severance, safety and/or accessibility for cyclists and pedestrians.</p>

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1105881	Michael Atkins	Port of London Authority	LP378	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	No				25. Safeguarded Wharves Policy From the PLAs comments above, it can be seen that a number relate to the boroughs two safeguarded wharves, Orchard Wharf and Northumberland Wharf, to ensure that they continue to be protected for waterborne freight purposes, and that future development around these sites are designed in such a way to not prejudice their future operation. The PLA consider that a separate policy may be appropriate, which specifically relates to the safeguarded wharves in the borough. It could refer to the juxtaposition issues relevant to the consideration of new development proposals and to these wharves. These issues are likely to include noise & vibration impacts, air quality and access among others. A specific policy will help to raise the profile and importance of safeguarded wharves in the borough, encourage more use of the River Thames for the transportation of freight, and provide a borough-specific policy that is supported by London Plan policy 7.26 on increasing the use of the Blue Ribbon Network for freight transport.			We note your comment, however, it is considered that sustainable freight should be covered under a single policy and that sufficient detail and protection is provided in relation to safeguarded wharves.
1105881	Michael Atkins	Port of London Authority	LP356	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	Yes		19. Policy S.TR1: Sustainable travel (page 167) The PLA welcomes the references to river transport in part 1a of the policy, to supporting and safeguarding land for transport and freight infrastructure enhancements in part 2 of the policy and to safeguarded wharves in paragraph 11.13 of the explanation. These support the Thames Vision aims to get more goods off roads and onto the river and to increase the number of passenger journeys on the river.					Comment and support noted.

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1142656	Rabina Khan		LP539	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	No	Positively prepared; Justified; Effective			The vision to enable cyclists is welcomed but also the need to protect safety measures for cyclists is needed. The plan acknowledges that the vast majority of families reside in flats; therefore, the need for a car is necessary for commuting (school, shopping) including many who are carers and those who have members with disabilities. However, the plan wishes to restrict car parking within estates and there are no alternative solutions. On street parking is already very difficult, with many individuals having to park some distance from their homes. Electric cars currently are not affordable for many residents within Tower Hamlets due to their high price and very few pre-owned vehicles are currently available. Charge points would clearly take up space that could be used for existing cars for local residents.			Thank you for your comments. The proposed car parking policy and standards are consistent with current national and regional policy. The standards do allow for appropriate levels of 'on-site' car depending on the accessibility of the site to public transport services, but it requires that all new development is permit-free in terms on on-street car parking due to the lack of available permits in the borough. Regarding the comment about restricting car parking on estates, please note that the policy is only referring to future development coming forward in the borough and does not affect car parking on existing estates. In terms of the provision of disabled parking spaces and electric changing spaces, both of these are subject to London Plan standards which we adhere to.
790873	Sport England	Sport England	LP866	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	Yes		Policy S.TR1: Sustainable Travel Sport England welcome the prioritisation of walking and cycling and that it should be integrated within developments. This has parallels with Active Design principles.			Yes		Comment and support noted.
1142985	Transport for London (TfL)	Transport For London	LP733	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	N/A			<ul style="list-style-type: none"> TfL welcome the inclusion of this Policy within the Local Plan. Further detail could be provided as to how this will be delivered and the role the borough plays. For example 11.7 could include further text around the importance of implementing Travel Demand Management, that is for example retiming journeys on the PT network away from high peaks (i.e. addressing the dominance of peak travel). TfL would welcome further clarity with this Policy in terms of it being able to support the operational/service needs of the transport network, e.g. standing space for buses, driver welfare facilities, etc. 				<p>The supporting text to policy S/TR1 (paragraph 11.11) has been amended to further support the operational/service needs of the transport network (see below). However, we do not feel it is appropriate to reference travel demand management in the Local Plan given the difficulties in the enforcement of travel demand.</p> <p>Part 1 (d) seeks to ensure that development does not cause an unduly detrimental impact to the safety and efficient operations of existing transport networks, once appropriate mitigation measures have been taken into account. In particular, it is important that development does not:</p> <ul style="list-style-type: none"> compromise the safety of the highway user and/or the ability of public transport providers to safely operate services; which includes consideration of adequate driver

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												welfare facilities and bus stands;
635342	Aggregate Industries UK Limited		LP483	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	No	Effective; Consistent with national policy			The draft Policies Map helpfully identifies a number of existing designations for the part of the Borough area falling under LLDC control and which include the following: Conservation Area, Archaeological Priority Area, SIL, LIL, Neighbourhood TC, Publicly Accessible Open Space, MOL, LVRP, SINC, Green Greed, New Green Grid and Water Space Network Designation. Critically, however, it fails to identify the "Safeguarded Rail Site" within this area and comprising Bow Midland West. Required change: The full extent of the Bow West "Safeguarded Rail Site" should be added to the Policies Map. NOTE: See email attachment for rail freight sites and location.	Yes		Comment noted. The spatial designations that have been shown within the LLDC boundary have been done so purely for context purposes, such as the town centre network. In this regard, we do not consider that it is appropriate to show the safeguarded rail site on the Polices Map and figure 11 given it is not within Tower Hamlets planning authority area.
635711	London Concrete Ltd		LP485	PART 3: POLICIES, 11.5 Paragraph Policy S.TR1: Sustainable travel	No	Effective; Consistent with national policy			The draft Policies Map helpfully identifies a number of existing designations for the part of the Borough area falling under LLDC control and which include the following: Conservation Area, Archaeological Priority Area, SIL, LIL, Neighbourhood TC, Publicly Accessible Open Space, MOL, LVRP, SINC, Green Greed, New Green Grid and Water Space Network Designation. Critically, however, it fails to identify the "Safeguarded Rail Site" within this area and comprising Bow Midland West. Required change: The full extent of the Bow West "Safeguarded Rail Site" should be added to the Policies Map. NOTE: See email attachment for rail freight sites and location.	Yes		Comment noted. The spatial designations that have been shown within the LLDC boundary have been done so purely for context purposes, such as the town centre network. In this regard, we do not consider that it is appropriate to show the safeguarded rail site on the Polices Map and figure 11 given it is not within Tower Hamlets planning authority area.
829908	Andrew Wood		LP63	PART 3: POLICIES, 11.6 Paragraph	No	Justified			Car ownership ratios are very different across the Borough with some areas exceeding 50% PTAL rates are not homogenous with some areas have high PTAL and some low. These areas inevitably have higher levels of car ownership. Some areas like the Isle of Dogs only had access to public transport in the late 1980's (DLR) so inevitably many developments were built with 100%+ car parking provision. Tower Hamlets is not homogenous when it comes to transport and car ownership and should not be treated as such.	Yes		Comment noted. Our approach to transport and car parking is in accordance with the London Plan which sets the framework for using the PTAL (Public Transport Accessibility Level) model when it comes to determining car parking provision. Furthermore, in relation to your comment we also recognise and agree that there are nuances across the borough which is why the proposed parking standards seek to distinguish the Isle of Dogs from the rest of the borough.

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1142985	Transport for London (TfL)	Transport For London	LP735	PART 3: POLICIES, 11.8 Paragraph	N/A			<ul style="list-style-type: none"> TfL would like to see reference to the strategic walk network here as well, both encouraging people to use the existing, largely off-highway network of routes and promoting the development of feeder links to these routes e.g. Thames Path / Lea Valley Walk etc. 				<p>Comments noted and accepted. The supporting text to policy S.TR1 (paragraph 11.8) has been amended accordingly.</p> <p>Part 1 (a) promotes walking, cycling and public transport as a primary means of travelling. In order to ensure compliance with green grid policies (S.OWS1 and D.OWS3), development should incorporate an improved pedestrian and cycling environment that is safe, accessible and permeable both within the borough and into neighbouring boroughs. It also identifies the necessity to link development to the borough's strategic walk network and cycling network in accordance with the borough's adopted cycle strategy, particularly strategic cycle routes, as well as the need to improve access to river transport (see figure 189), where possible.</p>
635342	Aggregate Industries UK Limited		LP493	PART 3: POLICIES, 11.8 Paragraph	Yes		Section 2 of Policy D.TR4 is supported in full on the basis that it states: "Development adjacent to safeguarded wharves and rail depots is required to ensure it does not compromise their operation". However, to ensure that the national policy requirement to safeguard rail sites is robust the Local Plan must identify the safeguarded sites, and specifically Bow Midland West, on the Policies Map and where appropriate on figures within the Local Plan. This is as detailed in the objections above to the Policies Map and Figure 11.			Yes		Comment noted. We do not consider that it is appropriate to show the safeguarded rail site on the Policies Map and Figure 11 given it is not within Tower Hamlets planning authority area.
829908	Andrew Wood		LP67	PART 3: POLICIES, 11.10	No	Justified			Canary Wharf is a business not residential location Why then is so little development encouraged in Whitechapel, Bethnal Green, Bow and Mile End?	Yes		We note your comment. This section is only referencing the areas of highest accessibility within the borough and not distinguishing

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				Paragraph								between residential and employment development.
1105881	Michael Atkins	Port of London Authority	LP358	PART 3: POLICIES, Figure 18 Strategic transport connectivity	No				20. Figure 18: Strategic transport connectivity (page 170) The PLA consider that the proposed new river transport piers should be included on figure 18 showing strategic transport connectivity in the borough, as these are included on figure 38 later in the document.			Comment noted. Proposed piers are already annotated on figure 18.
1142985	Transport for London (TfL)	Transport For London	LP734	PART 3: POLICIES, 11.16 Paragraph Policy D.TR2: Impacts on the transport network	N/A			<ul style="list-style-type: none"> How will this be implemented to ensure delivery of infrastructure? Is this consistent with the borough's application of their Planning obligations SPD? 				<p>Comments noted and accepted. The supporting text to policy D.TR2 has been amended to provide more detail on the delivery of infrastructure (paragraph 11.22).</p> <p>Part 2 seeks to ensure that development does not exacerbate or overload transport networks through trips associated with its uses. Where appropriate, conditions and/or planning contributions will be used (in accordance with policy D.SG5) sought through section 106 monies to secure mitigation measures required to make a development acceptable in transport terms. This is in addition to community infrastructure levy contributions which fund transport infrastructure improvements on a borough-wide scale. The required infrastructure and/or improvement measures should not be in conflict with the Regulation 123 List. All contributions towards new transport infrastructure improvements must be in accordance with policy D.SG5 and the Planning Obligations Supplementary Planning Document (SPD).</p>
1142186	Andrew Wood	Isle of Dogs NP Forum	LP124	PART 3: POLICIES, 11.23 Paragraph	No	Effective			There are sufficient electric-charging points; Given the announcement phasing out all fossil fuel vehicles from 2040, we believe that 'sufficient' should be replaced by 'each space should have access to an electric charging network, as well as any delivery vehicles.'. This would also be consistent with recent announcements from the Mayor of London about the extension of the ULEZ and concerns over air quality. At a minimum car parking spaces should be wired to provide 100% vehicle charging and it should be easy to slot in chargers as more and more vehicles become electric.	Yes		<p>The existing and emerging Local Plan requires development to prioritise sustainable approaches parking, which includes ensuring development provides parking bays and charging points for electric vehicles, based on the standards and design principles set out in the London Plan. In response to your comment, we have removed the reference to existing London Plan standard for 20% active and 20% passive electrical charging points for electric-vehicle charging given that the standard is likely change in the new London Plan.</p> <p>Paragraph 11.33:</p> <p>Development should also provide parking bays and charging points for electric</p>

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												vehicles, based on the standards and design principles set out in the London Plan. The current standard requires 20% active and 20% passive electrical charging points for electric vehicle charging.
1142186	Andrew Wood	Isle of Dogs NP Forum	LP133	PART 3: POLICIES, 11.23 Paragraph	No	Effective			Although covered partially in 'Policy D.TR4: Sustainable delivery and servicing' there should be more detail in the Parking policy about parking for servicing and delivery vehicles. The needs for these vehicles have to be considered as well.	Yes		Comment noted. It is considered that policy D.TR4 already contains the appropriate level of detail in regards to deliveries and servicing.
1142985	Transport for London (TfL)	Transport For London	LP736	PART 3: POLICIES, 11.23 Paragraph	N/A			▪ First sentence - demand greater than supply at specific times - not all the time				Comments noted and accepted. The supporting text to policy D.TR2 (paragraph 11.23) has been amended accordingly. Areas in the borough anticipated to accommodate higher levels of population and economic growth such as the Isle of Dogs and City Fringe, are where existing highway and/or public transport demand is already close to or exceeding supply during peak travel times . Other areas of the borough also experience local highway or public transport stress during these at specific times . Development that increases demand without appropriate mitigation (including infrastructure contributions to service improvements and/or delivering effective modal shift) will not be supported.
1142661	Abdul Basit		LP557	PART 3: POLICIES, 11.24 Paragraph Policy D.TR3: Parking and permit-free	N/A			As a new updated local plan the council should include wording to the policy on future developments to open up the basement parking's or "For Sale" parking spaces; especially those that are earmarked to sell with the private properties but not being sold for months and years (in some cases never sold at all) There should be more disabled parking within the local plan and certainly need to incorporate parking spaces for carers and health workers for the future and this local plan should address that				We do not accept that future development can sell off parking spaces as this is contrary to the objectives of the policy - new car parking must be provided for the benefit of the development only. In terms of disabled parking, the London Plan standard will apply and there is no parking provision requirement for carers and health workers.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP659	PART 3: POLICIES, 11.24 Paragraph Policy D.TR3: Parking and permit-free	No				Policy D.TR3: Parking and permit-free As a new updated local plan the council should include wording to the policy on future developments to open up the basement parking's or "For Sale" parking spaces; especially those that are earmarked to sell with the private properties but not being sold for months and years (in some cases never sold at all) Note: No soundness test undertaken.	Yes		We do not accept that future development can sell off parking spaces as this is contrary to the objectives of the policy - new car parking must be provided for the benefit of the development only.
635854	Barts Health NHS Trust		LP244	PART 3: POLICIES, 11.24 Paragraph Policy	Yes		We welcome the explanation at paragraph 11.27			Yes		Comment and support noted.

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				D.TR3: Parking and permit-free								
1142985	Transport for London (TfL)	Transport For London	LP737	PART 3: POLICIES, 11.37 Paragraph	N/A			<ul style="list-style-type: none"> Clarification is sought in terms of what is meant by the term 'contribution' towards cycle hire, given the CIL context and the boroughs Regulation 123 list. 				Comments noted and accepted. The supporting text to policy D.TR3 (paragraph 11.36) has been amended accordingly. Where appropriate, development will be expected to safeguard land within the site where Transport for London has identified a need to accommodate publicly-accessible shared cycle-hire station(s). Where this is not possible, a contribution will be sought from the developer towards publicly-accessible shared cycle-hire scheme docking station(s) in other locations close to the identified need.
719346	John Turner	Ballymore Group	LP275	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No				Policy D.TR4 – Sustainable Transportation of Freight The acknowledgement in part 2 that development can be situated adjacent to safeguarded wharves is supported. As outlined within our January 2017 comments wharves are often located in key regeneration areas and could potential fetter the ability for development to come forward without a strong policy justification. Innovative design is key for the cohabitation of these uses however can infringe on the viability of development. In order to achieve the goals of regenerating key areas within the Borough the Council should acknowledge the financial implications of mitigation measures.	Yes		While the council's policy requires that development adjacent to wharves does not compromise its operation, no evidence has been submitted to justify that it is the case that such development will result in significant additional build costs. The council will continue to consider viability at application stage on a site by site basis, so any costs identified in this regard can be accounted for in the context of the provision of planning obligations. It should also be noted that a viability study is an area-wide one that needs to account for the general cost characteristics of sites and not necessarily site specific costs that may arise such as in this case.
1105881	Michael Atkins	Port of London Authority	LP362	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	Yes		21. Policy D.TR4: Sustainable delivery and servicing (page 174) The PLA supports policy D.TR4 on sustainable delivery and servicing, which promotes movement by water, and that development adjacent to safeguarded wharves is required to not compromise their operation. The PLA also supports					Comments and support noted.

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							reference to the broad support for the development of new wharves or other facilities for freight transfer, where impacts on the environment and neighbouring amenities are minimised.					
1053881	Sally Styles	C M A Planning Ltd	LP92	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No	Justified			D.TR4 Sustainable Delivery and Servicing Comment: As per previous comments made in respect of the Regulations 18 consultation in respect of Policy TR4 (as was), the previous objections are maintained. As previously stated this is an onerous requirement for many smaller developments and the policy needs to set out which scale of development is affected by this policy. Suggested Amendment: Make clear that the policy relates to "Major development that generates a significant number of vehicle trips".	Yes		This is not believed to be necessary, as the policy is already clear that only developments generating a significant number of vehicle trips will be affected - there is no need to specify whether the development is major or not.

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1142548	Grafton Group PLC	Grafton Group PLC	LP422	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No				ALSO COPIED TO SUB-AREA Thank you for providing us with the opportunity to comment on Tower Hamlets Local Plan Regulation 19 consultation. These representations are submitted on behalf of both Grafton Group PLC and Regal London. Our response primarily relates to our interest in the Orchard Wharf site which is located in the Leamouth character place in the Isle of Dogs and South Poplar sub area. The site is located with the Isle of Dogs and South Poplar Opportunity Area and the Poplar Housing Zone. It comprises an area of approximately 1.36 hectares and was formerly an aggregates wharf last operated by St Albans Sand and Gravel. The aggregates operation commenced in the early 1960's but ceased in 1993. The site has stood vacant since then. Since this time it has had a chequered planning history including a failed CPO attempt by the PLA. Grafton Group PLC owns the Orchard Wharf site, and working with its development partner Regal London, there is an aspiration to secure planning permission for the mixed-use redevelopment of the site that would incorporate waterborne freight related uses in accordance with the site's safeguarded wharf status. It is within this context that we comment on the following aspects of the Local Plan below. In preparing these representations we have had regard to the need for consistency with strategic policies in the London Plan. We are in ongoing discussions with the GLA, PLA and LBTH over the future of Orchard Wharf. We remain of the longstanding view that the safeguarding of Orchard Wharf should be released and this is something we will continue to promote through the forthcoming London Plan review. Clearly if the safeguarding is released then there is an opportunity to bring forward a very different form of redevelopment on the site and the Local Plan review affords opportunity to respond to this. However, without prejudice on this position the following representations are based on the assumption that the safeguarding remains. We do however reserve our right to adopt a different position in response to any changes in strategic planning policies within the draft London plan that is due for publication on 29th November 2017.			Comments noted.

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1142548	Grafton Group PLC	Grafton Group PLC	LP452	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No				DUPLICATE COMMENTS FROM DEVELOPMENT PROVIDER Policy D.TR4: Sustainable Delivery and Servicing Part 2 of this policy requires that development adjacent to safeguarded wharves and rail depots does not compromise their operation. Supporting Para 11.46 then notes that the borough's river and rail network represents an underused resource and priority should be giving to utilising the rivers and canals to facilitate the movement of waste and goods, particularly the safeguarded wharves such as Northumberland Wharf and Orchard Wharf. We are broadly supportive of these policy objectives at the current time. In addition, we believe it would be appropriate for the policy to also make some reference to the potential for safeguarded wharf sites to accommodate an appropriate mix of uses where this can be demonstrated as not undermining or restricting the operation of the safeguarded wharf itself. The introduction of such complementary uses on safeguarded wharf sites can help to increase the overall viability of the sites and help to ensure that they can be reactivated for appropriate waterborne freight use in accordance with strategic policy objectives as outlined in the London Plan. In the case of Orchard Wharf, for instance, our analysis of the site to date suggests that an appropriate form of mixed use development represents the best opportunity for the currently vacant site (last used in the early 1990s) to be brought back into optimum use for waterborne freight uses. In recent years, it has been demonstrated through planning permissions granted at Cringle Dock in the London Borough of Wandsworth and Albert & Swedish Wharf in the London Borough of Hammersmith and Fulham that appropriate mixed-use development can be facilitated alongside appropriate safeguarded wharf uses. Such opportunity should not be frustrated by policies in the Development Plan.			Comments noted. We do not feel it is appropriate to include the proposed changes to Policy D.TR4. So long as the safeguarding designation stands, policy will aim to protect these sites from development in accordance with the London Plan. A London-wide review of safeguarded wharves will be undertaken in 2018.
1142035		Hermes Property Unit Trust	LP164	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	Yes				Policy D,TR4: Sustainable delivery and servicing The policy should define 'significant' in terms of vehicle trips.	Yes		Comment noted - it is considered that the level of significance, and the consequent need for assessment, can be decided on a case-by-case basis at the development management stage. A modification to state this will be considered.

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1142556	Regal London	Regal London	LP456	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No				<p>DUPLICATE COMMENTS FROM DEVELOPMENT PROVIDER Policy D.TR4: Sustainable Delivery and Servicing Part 2 of this policy requires that development adjacent to safeguarded wharves and rail depots does not compromise their operation. Supporting Para 11.46 then notes that the borough's river and rail network represents an underused resource and priority should be giving to utilising he rivers and canals to facilitate the movement of waste and goods, particularly the safeguarded wharves such as Northumberland Wharf and Orchard Wharf. We are broadly supportive of these policy objectives at the current time. In addition, we believe it would be appropriate for the policy to also make some reference to the potential for safeguarded wharf sites to accommodate an appropriate mix of uses where this can be demonstrated as not undermining or restricting the operation of the safeguarded wharf itself. The introduction of such complementary uses on safeguarded wharf sites can help to increase the overall viability of the sites and help to ensure that they can be reactivated for appropriate waterborne freight use in accordance with strategic policy objectives as outlined in the London Plan. In the case of Orchard Wharf, for instance, our analysis of the site to date suggests that an appropriate form of mixed use development represents the best opportunity for the currently vacant site (last used in the early 1990s) to be brought back into optimum use for waterborne freight uses. In recent years, it has been demonstrated through planning permissions granted at Cringle Dock in the London Borough of Wandsworth and Albert & Swedish Wharf in the London Borough of Hammersmith and Fulham that appropriate mixed-use development can be facilitated alongside appropriate safeguarded wharf uses. Such opportunity should not be frustrated by policies in the Development Plan.</p>			Comments noted. We do not feel it is appropriate to include the proposed changes to policy D.TR4. So long at the safeguarding designation stands, policy will am to protect these sites from development in accordance with the London Plan. A London-wide review of safeguarded wharves will be undertaken in 2018.

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1142556	Regal London	Regal London	LP459	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	No				ALSO COPIED TO SUB-AREA Thank you for providing us with the opportunity to comment on Tower Hamlets Local Plan Regulation 19 consultation. These representations are submitted on behalf of both Grafton Group PLC and Regal London. Our response primarily relates to our interest in the Orchard Wharf site which is located in the Leamouth character place in the Isle of Dogs and South Poplar sub area. The site is located with the Isle of Dogs and South Poplar Opportunity Area and the Poplar Housing Zone. It comprises an area of approximately 1.36 hectares and was formerly an aggregates wharf last operated by St Albans Sand and Gravel. The aggregates operation commenced in the early 1960's but ceased in 1993. The site has stood vacant since then. Since this time it has had a chequered planning history including a failed CPO attempt by the PLA. Grafton Group PLC owns the Orchard Wharf site, and working with its development partner Regal London, there is an aspiration to secure planning permission for the mixed-use redevelopment of the site that would incorporate waterborne freight related uses in accordance with the site's safeguarded wharf status. It is within this context that we comment on the following aspects of the Local Plan below. In preparing these representations we have had regard to the need for consistency with strategic policies in the London Plan. We are in ongoing discussions with the GLA, PLA and LBTH over the future of Orchard Wharf. We remain of the longstanding view that the safeguarding of Orchard Wharf should be released and this is something we will continue to promote through the forthcoming London Plan review. Clearly if the safeguarding is released then there is an opportunity to bring forward a very different form of redevelopment on the site and the Local Plan review affords opportunity to respond to this. However, without prejudice on this position the following representations are based on the assumption that the safeguarding remains. We do however reserve our right to adopt a different position in response to any changes in strategic planning policies within the draft London plan that is due for publication on 29th November 2017.			Comments noted.

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635711	London Concrete Ltd		LP494	PART 3: POLICIES, 11.38 Paragraph Policy D.TR4: Sustainable delivery and servicing	Yes		Section 2 of Policy D.TR4 is supported in full on the basis that it states: "Development adjacent to safeguarded wharves and rail depots is required to ensure it does not compromise their operation". However, to ensure that the national policy requirement to safeguard rail sites is robust the Local Plan must identify the safeguarded sites, and specifically Bow Midland West, on the Policies Map and where appropriate on figures within the Local Plan. This is as detailed in the objections above to the Policies Map and Figure 11.			Yes		Comment noted. We do not consider that it is appropriate to identify the safeguarded rail site given it is not within the Tower Hamlets planning authority area.

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1105881	Michael Atkins	Port of London Authority	LP366	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	No				22. Part 4: Delivering Sustainable places (pages 177 – 261) A number of site allocations in this section are located adjacent to or near the River Thames or River Lea. The PLA considers that it is important for all sites to: - Maximise opportunities to use the river for the transportation of construction materials and passengers; - Ensure that adequate riparian life saving equipment is provided; and - Improve public access to and along the Thames and River Lea. For sites close to safeguarded wharves, the PLA considers that developments are carefully designed and laid out so that they do not adversely affect the existing or future operation of the wharves.			<p>Policy S.OWS2 promotes the use of rivers and waterspaces for leisure and movement, including passenger and freight transport and, therefore, it is not considered necessary to make any changes.</p> <p>Matters regarding safety are addressed in the supporting text of policy D.OWS4, however it is proposed to strengthen such matters.</p> <p>Paragraph 8.48:</p> <p>Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, and active frontages to improve surveillance and riparian lifesaving equipment where appropriate. Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the River Lea which can have significant potential to attract visitors.</p> <p>Policies S.OWS2 and D.OWS4 address access along waterspaces; as such, no changes are necessary in this regard.</p> <p>Part 2 of policy D.TR4 ensures that development adjacent to wharves (and rail depots) does not compromise their operation.</p>
1102564	Richard Hill	Thames Water Utilities Ltd	LP781	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	N/A			Due to the level of detail provided on those site specific allocations it has been difficult to provide a more detailed assessment, specifically in some instances we have been unable to make any sort of assessment as the housing figures provided are by area, rather than by site.				The site allocations provide details about the land and infrastructure requirements, which are based on detailed assessments set out in the evidence base. Details regarding housing numbers will be discussed at the pre-app and/or planning application stage.
790873	Sport England	Sport England	LP868	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	No	Positively prepared; Effective; Consistent with national policy			Part 4: Delivering Sustainable Places. The site specific policies and supporting text have limited mention of sport and recreation facilities that would be required to support the growth expected in the various areas. Sport England acknowledges there is the odd exception to this but even then it refers to hectares of land or a leisure centre and not the facility that is actually required (for example one rugby pitch, a four-court sports hall, a swimming pool etc.). This likely because of the insufficient vague strategies that are supporting the Local Plan. It is also not clear why certain sizes of open space are required in some	Yes		The Playing Pitches Assessment includes an assessment of the borough's playing pitches and outdoor sports facilities following Sport England's Playing Pitch Strategy Guidance. The findings of the Playing Pitches Assessment, which has been reviewed and agreed by all national governing bodies have been used to inform part E of the Open Space Strategy. The Open Space Strategy includes an overarching open space action plan, also containing high level actions relating to outdoor sport facilities.

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								<p>places and other sizes in other places. Sport England notes that there are secondary schools required in some areas which could provide community sport facilities and would represent effective use of land. Overall, there appears to be limited consideration within the policies and supporting text of future demand on the already deficient sports facilities caused by the increased growth in the various sites identified in Part 4. Finally, in relation to this chapter, there is considerable development being proposed on various sites that provide an opportunity to entrench Active Design to help achieve the health and wellbeing vision and overriding policies of the Local Plan. Sport England recommends that Chapter 4 refers to the Active Design principles and seeks that development proposals on the site allocations are accompanied by a completed Active Design checklist so that activity is designed into places.</p>			<p>The Indoor Sports Facilities Strategy includes assessment of the borough's indoor sports facilities and specific strategic options and objectives.</p> <p>Given the significant level of open space deficiency in Tower Hamlets and the competing demands on the borough's open spaces (including playing pitches), the Open Space Strategy takes a more holistic approach that considers all open space needs, including space for outdoor sports. Embedding considerations for outdoor sports in the Open Space Strategy allows multiple demands on the borough's limited open spaces to be balanced more effectively in a very diverse and densely populated borough like Tower Hamlets.</p> <p>In addition and based on the Open Space and the Indoor Sport Facilities strategies, the Infrastructure Delivery Plan is a key document supporting the Local Plan. It provides an assessment of the current supply and future need for indoor sport facilities and outdoor sport facilities and playing pitches (included in the open space sections of the document) and identifies specific projects to help address this need.</p> <p>Furthermore, a more detailed action plan has been prepared based on the findings of the Playing Pitches Assessment and will be incorporated into the next update to the Infrastructure Delivery Plan as opposed to being outlined in the site allocations.</p> <p>The size requirements for the site have been based on what the site can accommodate and also proximity to open space deficiency, as well as viability. Some sites require 0.4ha and other 1ha.</p> <p>As referenced throughout the document, the IDP sets out the requirements of different types of infrastructure based on an assessment of need/demand. Paragraph 3.1 ,(part 1) is an example.</p> <p>Active design principles are set out in Part 3 of the Plan.</p>

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1142559	Tim Brennan	Historic England	LP448	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	N/A			We welcome the contextual approach to new development that is emphasised in part 4 of the Plan, as well in the development principles for each of the four places identified. While we appreciate the merit in ensuring these principles are bespoke to the area in question, we would suggest that for the Lower Lea Valley section it would be helpful to be consistent by including at point 1 explicit reference to heritage assets and their setting. We would recommend that where heritage assets are present on the sites in question or are nearby and likely to be affected by any development then they should be marked on the maps.				Agreed. Propose a minor modification to the wording to include reference to heritage assets. " Respect and positively respond to the historic industrial character of the area (including heritage assets) and reinforce its local distinctiveness" The site allocation maps are a illustrative spatial representation of the vision for the site and do not go into the finer detail regarding showing the location of heritage assets.
1142985	Transport for London (TfL)	Transport For London	LP705	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	N/A			In terms of Part 4, we feel further work is required to provide a finer grain of detail in terms of the role and responsibility of each site allocation, particularly providing consistency in the interrelationship and connections between sites which are located adjacent to one another.				The land use and infrastructure requirements along with the design principles and delivery considerations provide details regarding the role of each site. Therefore, no changes are proposed. Connections between the sites have been reviewed to ensure consistency. Details of the proposed modifications are provided in individual site allocations.
635797	Greater London Authority		LP694	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 1: Introduction	N/A			This section sets a vision for each sub-area of the borough and is welcome. It demonstrates the potential for significant development in the borough.				The GLA are in support of this section. No change required.

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1143450	Thomson Reuters		LP941	PART 4: DELIVERING SUSTAINABLE PLACES, 1.6 Paragraph	N/A			Figure 49 – Indicative Site Layout Part 4, Chapter 1, paragraph 1.6 currently reads as: All of the sub-areas and site allocations are shown in figure 19. This section also contains maps illustrating each sub-area and the site allocations within them. These maps are indicative and illustrate how the principles and requirements set out in this section should be implemented. We believe this to be conflicting, due to the nature of the maps being indicative, they should not be showing how development should be implemented within the designated site allocations. As such, we proposed paragraph 1.6 to read as the following: All of the sub-areas and site allocations are shown in figure 19. This section also contains maps illustrating each sub-area and the site allocations within them. These maps are indicative and illustrate how the principles and requirements set out in this section could be implemented. For information, we include the indicate Figure 49 below. Owing to the constraints attached to the existing Thomson Reuters operations and ownership interests, it would be expedient to recognise that any future development is likely to be delivered on a plot by plot basis. It is suggested that Figure 49 is amended to allow for plots within the allocation to come forward independently of each other and to allow for existing business operations of Thomson Reuters to remain in operation. To facilitate this approach, a revised diagram is provide at Figure 1 to identify indicative plot boundaries. Figure 1 – Revised Site Allocation 4.10 Reuter LTD (Figure 49) Indicative Plot Boundaries - See e-mail			With regards to the wording relating to the implementation of developments, the word 'should' is flexible enough to allow for negotiations at the pre-application/planning application stage. No change. Nor is it necessary to identify the various plots on the site to reflect operations and ownership interests, particularly as these aspects may change over the course of the plan. Matters regarding phasing can be addressed at the application stage. However, it is proposed that a minor modification is included in section 4. Proposed wording to be inserted in paragraph 1.9: Some of the site allocations are under multiple ownership and comprise a number of development plots. In such cases, effective engagement between landowners, developers and leaseholders needs to take place in order to facilitate potential land assembly and comprehensive redevelopment.

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1142677	Crest Nicholson		LP583	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 19 :Sub-areas and site allocations	N/A		<p>The site is located within the Globe Town District within the London Borough of Tower Hamlets and is broadly triangular in shape, measuring approximately 1.61 hectares in area. The site comprises brownfield land and was previously used as the London Chest Hospital. The hospital is vacant and there is no local demand or requirement to re-introduce a hospital service on site. The site is currently subject to a live planning application and application for listed building consent (LPA Refs PA/16/03342/A1 and PA/16/03342/A1 respectively). The site falls within Victoria Park Conservation Area and is within Flood Zone 1 which presents the lowest risk of fluvial flooding. The site is well connected to a range of public transport services within Bethnal Green and most of the site has a Public Transport Accessibility Level (PTAL) rating of 5/6. A small area of the site to the north west has a PTAL rating of 3. Potential Site Allocation</p> <p>The aim of this representation is to promote the site for future residential (Use Class C3) and non-residential institutional floorspace (Use Class D1) development, as per the current live planning application referenced above. This is aligned with the vision for Globe Town within the Core Strategy 2010 which highlighted the potential of the site for regeneration. This is shown below:</p> <p>IMAGE Having considered the size of the site, its favourable PTAL rating, and the London Plan (2016) density matrix1, it is considered that the site could deliver 200 – 700 habitable rooms per hectare. Given the constraints of the site which include the presence of a listed building and TPO trees along its perimeter, it is considered that the delivery of circa 492 habitable rooms on site is acceptable, as it would be below the advised maximum density level and appropriately strike a balance between delivering much needed housing and preserving designated heritage assets. As part of an</p>			<p>Proposal not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated.</p> <p>The capacity of the London Chest Hospital's Site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan).</p> <p>The sensitivity of the site being within a statutory listed building and also the character of the surrounding area, which includes a conservation area, this limits the amount of development on site to meet the threshold.</p> <p>While the recent planning applications for the site have proposed some form of community facility (e.g. D1 use), it is not considered that any other form of significant infrastructure could be provided to warrant it being a site allocation.</p>	

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								<p>allocation on the site, there will be a need to promote the retention and restoration of the key listed elements of the existing hospital building. This extends to the main body of the hospital building, including the attractive front facade, but excludes the northern and southern wings. The cost of undertaking restoration and demolition works should be taken into account when considering the scheme's wider viability and its ability to deliver over planning benefits, including affordable housing. It is proposed that any allocation will seek to retain as many of the protected trees on site as possible and will be of appropriate design, aligned with the adopted Victoria Park Conservation Area Character Appraisal and management guidelines document. Accordingly, the heights of any new development will need to be appropriate with respect to the heights of buildings immediately surrounding the site. Having undertaken an urban design appraisal of the site and the surrounding context, it is proposed that any development should have a maximum height of 10 storeys at the northern corner of the site. Building heights will be expected to be lower towards the south of the site to ensure congruence with existing buildings located immediately adjacent to the southern boundary and the main hospital building. A maximum building height of 5/6 storeys could apply within this area. It is considered that, in addition to the delivery of circa 350 units, the site presents an opportunity to deliver D1 non-residential institution floorspace. This would cater for the additional need for such facilities, generated by the new dwellings, but would also contribute towards existing provision for residents in the locality. Given the site's high PTAL rating, it is not envisaged that any potential allocation should be required to deliver vehicular parking spaces with the exception of wheelchair car parking, but should deliver a policy</p>				

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								compliant provision of cycle parking. This will ensure that the development promotes sustainable travel patterns and would assist in meeting Tower Hamlet's objectives to reduce carbon dioxide emissions. The site will also take advantage of opportunities to deliver energy efficient development through measures such as the installation of PV panels and combined heat and power initiatives. The allocation of this site will also provide the opportunity to deliver public open space. It is thought that the existing lawn area towards the west of the site could be made available for wider public use during daylight hours. The site presents an opportunity to secure a highly sustainable, residential-led mixed use development incorporating a number of different uses that would be beneficial to the wider community. It is on this basis that it should be allocated through the emerging Local Plan for development in accordance with the parameters discussed above.				
1142656	Rabina Khan		LP524	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 19 :Sub-areas and site allocations	No	Positively prepared; Justified; Effective			Community Land Trust In Shadwell there is currently work been carried out by local people and Telco for a Community Land Trust and the identification of land owned by TFL for a possible CLT. Site allocations do not consider Community Land Trusts at all and there is no reference within the Local Plan it its vision.			The Local Plan is not the document to delve into matters regarding Community Land Trusts. However, policy S.H1 (part 2c) supports a variety of housing products which meet local need, this could include a community land trust.
1142985	Transport for London (TfL)	Transport For London	LP738	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 19 :Sub-areas and site allocations	N/A			<ul style="list-style-type: none"> PTALs quote 2017, but the base year (as it's set out on Webcat) is 2015. Do future PTAL calculations take into account local connectivity benefits? E.g. in the delivery of new bridge infrastructure 				Agree to amend the date of the Public Transport Accessibility Levels (PTAL) from 2017 to 2015. Local connectivity benefits have not been taken into account at this stage due to the uncertainty of their deliverability and delivery dates. The PTAL indicated in the site allocations for 2031 reflect what is on Webcat.
1053788	Steve Craddock	The Canal & River Trust	LP371	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 2: Sub-area 1: City Fringe	N/A			The only waterway that the Trust owns or manages in the City Fringe sub area is a short stretch of the Regent's Canal north of Cambridge Heath. This stretch includes the proposed Marian Place Gas Works and the Oval allocation. Our comments are restricted to this site.				Comment noted.

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1053510	Zeloof LLP and Truman Estates Limit		LP718	PART 4: DELIVERING SUSTAINAB LE PLACES, Chapter 2: Sub-area 1: City Fringe	No				10. Sub Area 1 'City Fringe' 10.1. Pursuant to paragraph 5.3.3 onwards, the recognition of Spitalfields as a key urban area within the City Fringe location is supported. 10.2. The principles under paragraph 2.5 should recognise the role Spitalfields will have in delivering the commercial objectives of the City Fringe including the need for Tech City to grow capacity for 70,000 new jobs by 2031. This should be identified as a clear opportunity. Note: no soundness test undertaken	Yes		Support regarding the recognition of Spitalfields noted. However, it is not considered necessary to specifically refer to Spitalfields with regards to delivering the objectives of the City Fringe. The City Fringe sub-area principles address employment uses as part of delivering economic growth . This is also supported by the employment policies. The Tech City forms a key element of the future growth proposals for the City Fringe. Spitalfields is also identified as one of the 24 places in Tower Hamlets as set out in figure 4.
635414	City of London		LP578	PART 4: DELIVERING SUSTAINAB LE PLACES, Chapter 2: Sub-area 1: City Fringe	N/A			Recognition of the City of London as a world-class economic hub is welcomed. It is important that there is an appropriate balance and mix of uses to support the financial and business centres of the City, Tech City and Med City and to recognise this area as such. Provision of other uses, including residential, should be planned in a way which is complementary to these employment clusters. Links into the City are welcomed to enhance permeability and ease pedestrian movements in Aldgate, Whitechapel and Tower. The intention to enhance the public realm in and around the Tower of London World Heritage Site is also welcomed.			Support welcomed and comment noted.	
1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP346	PART 4: DELIVERING SUSTAINAB LE PLACES, 2.3 Paragraph	Yes		The vision and aspirations for the City Fringe are supported and are in line with our client's aspirations for the site. In particular, the capacity to provide a minimum of 10,083 new residential units in the borough, alongside 44,170 sqm of new office floorspace and the creation of 3,908 new jobs is supported. The development of the Bishopsgate Goods Yard has the potential to				Support welcomed.	

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							significantly contribute to the delivery of these targets.					
1142064	Lucy Rogers		LP84	PART 4: DELIVERING SUSTAINAB LE PLACES, 2.3 Paragraph	No	Justifi ed			Widespread evidence suggests that the disappearance of workspace in the City Fringe is affecting the small business and local economy. Yet the Local Plan - which acknowledges the loss of workspace in the borough and possible harmful effects - ignores this small enterprise economy in its plans for the City Fringe. The East End Trades Guild and other local community groups concerned with the future of the Bishopsgate Goodyard, for example, have continues to press for the area to remain a centre for this kind of economy, not let it be taken over by large corporations and chains that already well catered for and offer little to the area. The tourist economy of the City Fringe is also particularly dependent on small enterprises, independent businesses and similar unique selling points. If it is further turned over to a corporate economy this will damage the whole. The Local Plan does not seem to have either assessed this particular local economy in a careful way, or fed the information into the City Fringe policy and into Town Centre Policy. We are instead looking at a City Fringe policy based on very old OAPF that was comprehensively challenged by the local community at the time it was written, due to the fact that it does not represent and acknowledge the small business economy or the residential community but treats the area as simply extra land for the City of London's operations. The policy for the City Fringe therefore needs to be supported by updated evidence of the small business sector and needs to provide for this sector (affordable workspace, industrial space, flexible mixed use including B1c use) in the City Fringe. Not to do so goes against the principles of sustainability in planning and disregards current warnings about the disappearance of local employment. possible wording: --- support a mix of uses including the small and micro-enterprise economy, providing and protecting workspaces that contribute to this sector. --- strengthen the role and function of the area's distinctive and varied town centres to provide a choice of cultural, leisure, retail activities and employment spaces used by small independent enterprises.	No	NPPF para 7 7. There are three dimensions to sustainable development: economic, social and environmental. ● an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; para 17 ● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development	The Local Plan employment policies have addressed the local economy particularly through the explicit promotion of SMEs and a range of units in the employment policies and site allocations. The evidence is based on the baseline year of 2016 and is still relevant, however additional evidence on affordable workspace has been provided. With regards to the comment about large corporations and chain occupying developments, the end user of a development is not a planning consideration.

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											<p>needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities; para 21 • set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;</p>	

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											<p>As above The policy for the City Fringe needs to be supported by updated evidence of the small business sector and needs to provide for this sector (affordable workspace, industrial space, flexible mixed use including B1c use) in the City Fringe. Not to do so goes against the principles of sustainability in planning and disregards current warnings about the disappearance of local employment and small businesses.</p> <p>possible wording: - -- support a mix of uses including the small and micro-enterprise economy, providing and protecting workspaces that contribute to this sector. --- strengthen the role and function of the area's distinctive and varied town centres to provide a choice of cultural, leisure, retail activities and small employment spaces.</p>	

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1142691		Alliance Property Asia	LP615	PART 4: DELIVERING SUSTAINAB LE PLACES, 2.3 Paragraph	Yes		VISION FOR SUB- AREA 1 : CITY FRINGE The vision and aspirations for the City Fringe are supported and are in line with our client's aspirations for the site. In particular, the capacity to provide a minimum of 10,083 new residential units in the borough, alongside 44,170 sqm of new office floorspace and the creation of 3,908 new jobs is supported. The development of the 2-6 Commercial Street and 98-105 Whitechapel High Street site has the potential to significantly contribute to the delivery of these targets and should be identified as a strategic site allocation within the LBTH Local Plan. Note: No soundness test undertaken.			Yes		The vision for the City Fringe is supported - therefore no changes are proposed.

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1131148	LB Hackney	LB Hackney	LP579	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21 :Vision for City Fringe	Yes		One of the areas being promoted for employment uses by both authorities is Shoreditch and Tech City; we are supportive of Tower Hamlets' vision for the City Fringe which seeks to expand the opportunities arising from Tech City. This area similarly forms a key part of Hackney's growth strategy as an area where we are promoting employment, retail, leisure and cultural uses. We would encourage delivery of maximum employment floorspace in this area to support the needs of the wider City Fringe Opportunity Area. An Area Action Plan (called Future Shoreditch) is being prepared to guide and manage the growth that is anticipated in Shoreditch and we look forward to continuing to work closely with Tower Hamlets as the Future Shoreditch progresses.					Comments noted. London Borough of Tower Hamlets also look forward to working with the London Borough of Hackney on their emerging area action plan.

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1054252	Londone wcastle	Londone wcastle	LP631	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21 :Vision for City Fringe	Yes		The vision and aspirations for the City Fringe are supported in principle and are in line with our client's aspirations for the Whitechapel Estate site. The development of the Whitechapel Estate has the potential to significantly contribute to the delivery of housing targets as per the Whitechapel Vision Masterplan SPD.					Support welcomed.
1033229	Paul Burley	Montagu Evans LLP	LP55	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21 :Vision for City Fringe	No	Justified			Representations on Behalf of Barts Health NHS Trust (ID: 635854) Sub Area Diagrams Please refer to our comments in relation to site allocation and in relation to the combination of geographic and non-geographic notations on the same figure. We also question whether the reference to the 'Med City Campus Green Link' is the same as the 'Green Spine' referred to elsewhere. If so and if this is to be retained (bearing in mind our other comments) then this should be amended for consistency.			It is not possible to amend the evidence at this stage, but the Med City Green Campus Link is in effect, the Green Spine. In the Green Grid Strategy, it is referred to as the Med City Green Link on the key but the supporting text does refer to the Green Spine. We will make the wording clearer in the vision by stating the following in the key: 6. Med City Campus Green Link (the Green Spine)

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1143324		Resolution Property plc	LP806	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21: Vision for City Fringe	N/A			<p>Thomas More Square comprises of 6 office buildings, 3 café/restaurant uses and 3 small retail units. Current occupiers of the offices include Mitsui, Svenska Handelsbanken and future occupiers include Gensler Architects, whose European Head Quarters will be located in Building 6 once work is completed. when completed Building 6 will be used as the European Head Quarters for Gensler Architects. Resolution Property are currently exploring options to optimise the site known as Building 7 to deliver a co-living scheme. In this context, we would suggest that the policies of the emerging plan and allocation are adjusted to incorporate the following amendments discussed below.</p> <p>Thomas More Square is located within the City Fringe Sub Area, outlined on page179 of the draft Local Plan. The site also lies within:</p> <ul style="list-style-type: none"> · Wapping Neighbourhood Planning Area · Preferred Office Location: Around Tower Gateway South · Central Activities Zone · Thomas More Neighbourhood Centre · Archaeological Priority Area: St Katherine's Docks · London Views Management Framework: Tower of London <p>Resolution Property's Vision for Thomas More Square and Building 7</p> <p>The site, building 7, is located on the south western edge of Thomas More Square. The site is currently occupied by a low rise retail parade. The current building does not make best use of the site, nor does it complement the building design and massing of the buildings that form Thomas More Square. Therefore, the site has been identified as suitable for the development of an alternative building with increased massing. Resolution Property are committed to bringing forward a new use for the site that compliments the uses of the wider Estate and contributes to the attractiveness and the competitiveness of the Estate, when 2 compared with alternative City Fringe locations. Due to the scale and locality of the site, Resolution Property consider the site</p>		Yes		No change proposed. The principle of co-living will be dependent on the policy designations for the site (particularly the employment) and compliance with the HMO policy and other relevant policies.

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								to be an appropriate location for a co-living concept and are exploring proposals for a co-living unit with retail uses at ground floor level. Co-living is an evolution of flat/house-sharing that is growing in popularity across the UK and US. As London's population continues to increase, the co-living model will play a big part in ensuring that the chronic undersupply of good quality housing is met. Whilst the US market for co-living is relatively advanced across a number of cities including New York, LA, San Francisco and Chicago, the UK market is relatively immature with only a handful of schemes that are operating/planned (e.g. The Collective Old Oak and The Collective Stratford). The target market for this type of residential accommodation is for those who have recently moved to the city and are looking for a community-based lifestyle in the heart of a City. The typical occupier lives a relatively transient lifestyles and therefore rental periods usually range from 3 month to 12 month contracts. Occupiers view this type of accommodation as a an opportunity to transition into the local community and build networks within the city.				
1143324		Resolution Property plc	LP823	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21 :Vision for City Fringe	Yes		We support the retention of Thomas More Square within the City Fringe Sub-area.			Yes		Support the retention of Thomas More Square within the City Fringe sub-area - therefore no change proposed.
671908		UKI (Fleet Street) Limited and UKI (Shoreditch) Limited	LP904	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 21 :Vision for City Fringe	No				Vision for Sub-area 1: City Fringe The vision and aspirations for the City Fringe are supported and are in line with our client's aspirations for the site. In particular the capacity to provide a minimum of 10,083 new residential units in the borough, alongside 44,170 sqm of new office floorspace and the creation of 3,908 new jobs is supported. The development of the Huntingdon Estate and the site at Fleet Street Hill have the potential to significantly contribute to the delivery of these targets. Concluding Remarks We would be grateful if you could confirm receipt of the enclosed representations. Should you require further information or clarification on the representations made, please do not hesitate to contact Olivia Willsher or Holly Farrow of this office. Please keep us informed			Support welcomed.

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									on Local Plan progress.			
635854	Barts Health NHS Trust		LP246	PART 4: DELIVERING SUSTAINAB LE PLACES, Figure 21 :Vision for City Fringe	No				Sub Area Diagrams Please refer to comments above in relation to site allocation and in relation to the combination of geographic and non-geographic notations on the same figure. We also question whether the reference to the 'Med City Campus Green Link' is the same as the 'Green Spine' referred to elsewhere. If so and if this is to be retained (bearing in mind our other comments) then this should be amended for consistency.	Yes		We cannot change the evidence at this stage, but the Med City Green Campus Link is in effect, the Green Spine. In the Green Grid Strategy it is referred to as the Med City Green Link on the key but the supporting text does refer to the Green Spine. We will make the wording clearer in the vision by statating the following in the key: 6. Med City Campus Green Link (the Green Spine)
1053884		Queen Mary Universit y of London	LP668	PART 4: DELIVERING SUSTAINAB LE PLACES, 2.5 Paragraph	No	Positi vely prepa red			Mile End Campus As highlighted in our previous representations, QMUL occupies a prominent position within Mile End providing academic, administrative and student accommodation for QMUL students and staff. The Mile End Campus (see enclosed plan) is the largest self-contained campus in London. In order to support the growth of the university and maintain and enhance the quality of teaching, student experience and research, QMUL have aspirations for significant redevelopment of parts of the campus over the plan period, including substantial additions to the amount of learning, teaching, student social and academic space. The high-level plans were tabled at the meeting with officers in February 2017 and the current plan as drafted does not sufficiently recognise these growth requirements. This intrinsically links to the policy of the supply of purpose built student accommodation and the supply of conventional homes. By the University intensifying their existing sites for additional accommodation, it will allow other sites to become available for other types of self-contained housing or uses. In this regard the plan is not sound as it has not been positively prepared to ensure this growth can be accommodated over the plan period. QMUL would welcome engagement with LBTH to discuss their ambitions, and whether an allocation within the plan would be appropriate in order to guide this growth. Through an allocation QMUL would seek to protect the existing use and provide scope for the Universities growth aspirations, in particular academic space and supporting accommodation. This is particularly important in light of Policy D.H6 (Student Housing) which requires that new purpose-built student accommodation be directed to locations in close proximity to the boroughs higher education institutions and highlight accessible locations. SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound.	Yes		The vision for the central area sets out the aspirations for the development of the QMUL campus and also refers to a diverse range of housing types therefore no changes are proposed. Allocating the site would not add any benefit to the proposed uses on site. In addition, the site does not meet the criteria set out in the site allocation methodology to deliver 500 net additional homes (threshold as per London Plan policy 3.7) as well as infrastructure.

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									These are summarised below, and we request that these are incorporated into the plan prior to adoption. Mile End Campus - QMUL would welcome further engagement on the future aspirations for the Mile End Campus, and to ensure the policies are aligned. To enable this, we would propose that a site allocation is developed to meet the universities growth requirements.			
1143324		Resolution Property plc	LP824	PART 4: DELIVERING SUSTAINABLE PLACES, 2.5 Paragraph	No	Effective			The draft vision for city fringe recognises the importance of the mix of uses within the city fringe and supports development of further employment, residential and amenity floorspace. The proposed development principles (paragraph 2.5), state that a 'range of housing typologies' need to be provided to improve the sustainability of the area. We support the vision for the continued provision of a mix of uses within the City Fringe and the development principle requiring the provision of a 'range of housing typologies'. However, we suggest that further clarity on the housing typologies is provided within the development principles and within the Local Plan's wider housing policies. Specifically, we suggest that the 'co-living' model of accommodation is specified as an acceptable housing typology within the City Fringe. The co-living model has garnered attention with policy makers at both a national and regional level as a model for delivering non-traditional residential accommodation of a high quality at a genuinely affordable price. The Mayor's Draft Housing Strategy 2017, outlines the need for London's housing offer to be diversified and provide a wider range of housing typologies. The strategy supports the rise in purpose-built private rented homes (Build to Rent), which will provide a more stable and well-managed supply of homes at a range of rent levels across London. Although not specifically outlined in the strategy, the co-living model is arguably a form of 'build to rent' accommodation that can contribute to meeting the Borough's Housing Need by providing accommodation for a market demographic that is currently under supplied. In addition to the above, it is our understanding the New Draft London Plan (to be published late November 2017) will advocate the development of co-living schemes and recognise the model as being an important contributor to meeting London's housing need. Therefore we encourage the Borough to consider the importance of 'co-living' schemes and how they can contribute to the Borough's Housing alongside more conventional housing typologies. We therefore suggest that clarity is added to the City Fringe's housing needs development requirements and the acceptable housing typologies are outlined. We therefore propose that the text is amended to paragraph 2.5. 6.	Yes		It is not considered necessary to provide further clarification relating to specific housing typologies in the sub-area principles. The housing policies contain details on housing typologies, including policy D.H7 (Housing with shared facilities), which specifically relates to co-living and locations that are generally acceptable for such accommodation e.g. high transport accessibility. The sub-area principle requires the housing typology to create sustainable places, therefore if a co-living scheme is appropriate then it will be deemed acceptable in principle.

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									Provide a range of housing typologies to create sustainable places to live, work and play. Insert <Typologies to include town houses, flats, maisonettes, duplexes, co-living accommodation and build to rent accommodation>.			
1130948	Adam Price	Transport for London	LP292	PART 4: DELIVERING SUSTAINABLE PLACES, 2.7 Paragraph	No				Land above Whitechapel Station (also known as 'Whitechapel Arc') You will be aware that this site was submitted under both the 2015 Call for Sites exercise and the Regulation 18 consultation as a site measuring 1.26ha, considered to have the potential to bring forward circa 300 residential units, together with employment floorspace to support the borough's economy. We are concerned that this has not been included as a site allocation in the latest draft of the plan and, once again, would like to reaffirm our ambition to take this site forward and seek to include it within the borough's site allocations, as a site capable of providing mixed-use development. This is particularly appropriate given the location of the neighbouring Whitechapel Road site allocation to the south and the only way that this can be fully achieved and wider context optimised, is through the inclusion of the Whitechapel Arc in the Local Plan as a site allocation.			Proposal not supported: The capacity of the Whitechapel Arc does not meet the housing delivery threshold of delivering a minimum of 500 net additional homes (as per London plan policy 3.7) in addition to social infrastructure. It is therefore not suitable as a site allocation.
1143389	Sainsbury's Supermarket Limited		LP910	PART 4: DELIVERING SUSTAINABLE PLACES, 2.7 Paragraph	No	Effective			Part 4 of the emerging Local Plan sets out the principles for development within the City Fringe. Reference is made to relevant policy documents which should be considered alongside the guidance within this section of the Plan including the Whitechapel Vision Masterplan SPD. The SPD identifies a number of 'Key Place Transformation' sites which will form part of the Whitechapel Masterplan. Part 4 also identifies specific site allocations within the City Fringe opportunity area. The Site is not however an identified allocation despite being earmarked for development within the SPD. Given that the Site is identified as a 'Key Place Transformation' within the Whitechapel Vision Masterplan SPD, we recommend that it is included as a site allocation for the City Fringe opportunity area and enshrined in Local Plan policy. This will provide further certainty for the site and local community that LBTH support the development of the site.			Proposal not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated. The capacity of the Sainsburys Site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan).

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1053844	Samantha Powell	Department for Education & Skills	LP611	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 22 :City Fringe site allocations	N/A			Comments on the Local Plan - proposed site allocation 3. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The comments in the EFA response to Reg 18 consultation still stand. The following comments set out the ESFA's view of the plan's soundness in respect of education provision and specifically request a site allocation be made within the plan. 4. It is requested that the site of the Former Metropolitan University (FMU) building at 41-47 Commercial Road be allocated for a mixed-use development that comprises a new all-through school and housing. 5. The site is in education (D1) use and is now owned by the Department for Education (DfE) with the intention to deliver a new school over the next 3 years. A new school opening in the area has been approved by the Secretary of State for Education – named as the Livingstone Academy East London. 6. The Council recognises this school in its Infrastructure Delivery Plan (IDP) (LBTH, October 2017) and in the LBTH Planning for School Places – 2017/2018 Review. There is a need for 6FE at primary level across the LBTH area as well as a new secondary school. 7. The requested allocation of the site therefore meets the government's objectives and those of the local planning authority, which needs to provide for additional school places over the next 10-15 years. The allocation of the site would sit within the delivery timeframe of the Local Plan. Significant discussions have been held with the Council and the GLA, and a planning application is to be submitted shortly. 8. The property is controlled by the ESFA and funds are available to bring the project forward – being deliverable is an important aspect in terms of a Local Plan allocation as well as being relevant to the soundness of the plan. 9. The site can accommodate a school				Proposal not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated. The capacity of the site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan)

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							<p>for 1,570 pupils as well as up to 75 flats. The site is highly accessible, within the Central Activities Zone and suitable for regeneration to a high density. The site lies within LBTH Education Areas 5 and 6. There are no Free Schools with primary provision within these areas. As highlighted in the previous Reg 18 rep, national planning policies for state funded schools confirm that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities (NPPF para 72). 'Choice' is a key objective and the NPPF states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. 10. The DfE's approval for the Livingstone Academy recognised that it would serve Tower Hamlets and other London boroughs and potentially be delivered in a building on this site. It was recognised that Tower Hamlets was an ideal location for this type of Academy, being a multi-cultural and highly aspirational area. The Academy will focus on STEAM subjects (science, technology, engineering, arts and maths). 11. The Local Plan identifies the need for secondary school provision and primary provision. The positive allocation of this site within the Local Plan will assist meeting this need within the Local Plan timeframe.</p> <p>REPRESENTATION ALSO ADDED TO INFRASTRUCTURE</p>				

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1054270	BGYRL	Bishopsgate Goods Yard Regeneration Limited	LP347	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 23 :Bishopsgate Goods Yard	N/A			Our client supports the inclusion of the Bishopsgate Goods Yard site as a site allocation (1.1) as it represents the largest vacant brownfield site within the City Fringe. The site represents a strategically important opportunity to deliver housing and commercial floorspace to meet increasing demand in the Borough. The draft Local Plan should identify the development capacity of the site, as noted in the Managing Development Document (2013) and the Bishopsgate Goods Yard Interim Planning Guidance ('IPG'). The document should also be flexible in terms of site capacity and mix and balance of uses across the site. Given the excellent public transport accessibility of the site as a result of its close proximity to Shoreditch High Street Station and its central location, high density development should be supported. At present, this objective is not explicit within the drafting and the text should be amended to reflect this. Furthermore, for the reasons outlined above, the draft Local Plan should state that large scale and tall buildings of a central London scale are appropriate within this site allocation area. This is already acknowledged within the IPG, but again is not currently clear within the current drafting. Any proposal for tall buildings would of course be subject to site specific considerations including potential amenity impacts, townscape and heritage assessment and a high-quality design. However, the document should include a presumption in favour of tall and large scale buildings. We request further detail on the sites development capacity as well as the Council's support for higher density development and the inclusion of tall and landmark buildings. The design principle which notes that the development should "provide open space with a minimum size of 1 hectare, consolidated and integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located			<p>The capacity of sites will be discussed at the application/pre-application stage. The mix and balance of uses will also be assessed at the pre-application/application stage and subject to the requirements set out in the site allocation and other Local Plan policies. As this site lies outside the tall building zone, we would support the inclusion of tall buildings where they are able to meet the criteria in policy D.DH6 (parts 1-3) and other relevant policies within the Local Plan. Open space: As evidenced in the Open Space Strategy (2017-2027), Tower Hamlets currently has an open space deficiency and based on population growth projections this will continue to grow if the current amount of open space in the borough remains unchanged. In order to mitigate this deficiency and provide closer access to parks, the strategy identifies specific sites to provide new strategic open space (strategic open space is classified as 1ha and above).</p> <p>The strategy identifies the site as being within the Wavers ward which has a high deficiency projection in 2031. The Bishopsgate Goods Yard site is specifically identified in the strategy to provide active recreation space on the border between Spitalfields and Banglatown to overcome a lack of access for residents in both places. We consider that this strategy clearly identifies the requirement for a minimum 1 ha of open space to meet the borough and local deficiency both currently and as a result of future population projections. Therefore, we consider that there is justified evidence supporting the requirement of 1ha of open space on the site in the Local Plan. Policy S.OWS1: Creating a network of open spaces guides the provision of new open space and the explanation text (paragraph 8.18) specifically states that new open space will be promoted throughout the borough in accordance with the principles set out in the Open Space Strategy, Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance. Indoor sports facilities: This was an objective explored in the Indoor Facilities Strategy (2017) in order to assist in increasing the overall supply of publicly accessible sports facilities in the borough. Community facilities: The community</p>	

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								above the Braithwaite Viaduct" should be removed as flexibility is sought on the level and location of strategic open space being delivered on the site. Reference to the provision of a leisure facility should also be removed as this is not included in the current LBTH MDD site allocation. Improve movement through the area and repair fragmented urban form is supported. It is unclear why "locate a community/local presence facility on key routes" is included as it does not relate to movement or permeability. This should be removed. Flexibility is sought for the delivery of community infrastructure. The current wording of the draft Local Plan requires this to be delivered at the early stage of the development. Early stage is not defined. We request further flexibility on this point so that community infrastructure can be delivered at an appropriate point in the phased scheme. Furthermore, it should be noted that figure 23 is indicative and does not restrict the layout or provision of routes across the development site We trust that you will take these comments into consideration during the Council's deliberations, and we request to be kept informed of the ongoing preparation of the Local Plan. If you require any additional information or clarification on the above, please do not hesitate to contact Dean Jordan or Julian Shirley of this office.				facility should be located on key routes and this is reflected in policy D.CF3 which requires them to be easily accessible. Phasing/delivery: The term 'should' is considered to be flexible enough to enable the development to be delivered in an alternative manner providing satisfactory evidence is submitted and agreed. Figures/diagrams: The plans will state that they are for illustrative purposes.
1131148	LB Hackney	LB Hackney	LP580	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 23 :Bishopsgate Goods Yard	N/A			One cross-boundary site of interest within the Shoreditch area is the Bishopsgate Goods Yard. Tower Hamlets' viability assessment within the Site Allocations methodology document identifies that this site has capacity for 1,050 residential units, up to 92,000sqm of office floorspace and 20,000sqm of retail floorspace. Hackney has identified capacity on this site (for the area within our boundary) for 462 residential units, 119,233sqm employment floorspace, 4,050sqm retail floorspace and 5,875sqm community floorspace. As discussed at our duty to cooperate			London Borough of Tower Hamlets will be preparing a Statement of Common Ground with the London Borough of Hackney regarding the site allocation and any other necessary policy matters.	

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								meeting on 25 September, it would be beneficial to both boroughs for us to develop a Statement of Common Ground on the Bishopsgate Goods Yard site allocation prior to LB Tower Hamlets examination. We will be in touch about this separately and look forward to working closely with Tower Hamlets on this site.				
1142985	Transport for London (TfL)	Transport For London	LP742	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 23 :Bishopsgate Goods Yard	N/A			▪ Echoing previous comments, improvements to key routes should specify pedestrian / cycle improvements around Shoreditch Triangle, as this is an aspiration for the OAPF. Key principles should also refer to car free schemes.				Agreed. Include wording in the design principles to ensure that the site is able to accommodate the improvements to the triangle Proposed wording: • improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane district town centre, Shoreditch Triangle and the new open space. These should align with the existing urban grain to support permeability and legibility; Parking standards are already covered in chapter 11.
829908	Andrew Wood		LP66	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 24 :London Dock	No	Justified			The secondary school is planned to go in the yellow public space in the north west of the site	Yes		Agreed. Amend the plans so that: • the location of the public square is located in the central part of the western portion of the site
1053309	Jane Wilkin	Environment Agency	LP256	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 24 :London Dock	No				We raised in our previous comments that these sites have been subject to historic uses which have the potential to have resulted in land contamination, however this has not been included within the delivery considerations for the allocations. Land remediation is a significant consideration in the delivery of a development as in some cases it can take a long time to undertake assessments and remediation to enable commencement of the development. Assessments are required for these sites as part of the planning application to understand the potential contamination on site. The delivery considerations should be expanded for these sites to highlight the previous historic uses of the site which may have resulted in land contamination. Suggested wording: Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.	Yes		The delivery considerations can include the suggestion for an assessment to be undertaken prior to any development taking place, however the site allocations will not go into the level of detail as to what specific historic uses took place on the site. Proposed wording/additional bullet point: An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

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1143387	Berkeley Group		LP905	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 24 :London Dock	No	Effective			St. George welcomes the continued retention of the site allocation for London Dock from the Managing Development DPD. The London Dock site is a key site in the City Fringe Opportunity Area and has a critical role to play in delivering a large amount of housing as part of a wider mixed use development. The site currently benefits from an existing planning permission for up to 1,800 new homes, as well as flexible non-residential uses (reference: PA/14/02819) which is currently being implemented. The draft Local Plan allocation for housing, open space and employment use which is consistent with planning permission PA/14/02819 is supported. There is no reference or acknowledgement of the implementation of this permission on the London Dock site. The draft Local Plan retains the London Dock allocation for a Secondary School. The draft Local Plan allocates five sites, more than the required need identified by the Council for four secondary schools. Furthermore, the potential role of free schools and academies has not been properly taken into account, therefore the need for secondary schools could be fewer. As noted by the Planning for School Places - 2017/18 Review, heard at Cabinet Meeting on the 19th September 2017, demand for secondary provision is lower than that previously forecast (paragraph 3.5), whilst, as demonstrated within the appendices, the need for provision of the intake year of secondary provision is largely in the east of the Borough (Lower Lea Valley/Isle of Dogs). The Review also recommends the proposed preference is to bring forward the Westferry Site over the London Dock site, being in a more appropriate location, closer to the centres of demand for additional secondary provision (para 3.16 of the Budget Review). As confirmed within the minutes of the Cabinet Meeting, Members agreed to defer development work on the scheme at London Dock until a further review of projected demand for secondary places had been conducted and to progress with the Westferry Site (fifth bullet point of minutes). Furthermore, Members of the Scrutiny and Overview Committee considered that 'the location of schools should give consideration to not locating in areas of high pollution (e.g. Building of school on London Dock)' (minutes, 14.09.17 Committee). The London Dock site is not located within a part of the borough where the Council has identified significant additional school demand, and is also not considered to be within a suitable location for a school, being along a major highway within an area of high pollution. Therefore, along with the cost and wider budget pressures the delivery of a school on this site brings, we now question the validity of locating a school in this location and that consideration should be given to its removal. Should the site be released it would afford			It is not considered necessary to refer to the implemented permission within the site allocation. Matters regarding the requirement for the school can be found in the Site Allocations Methodology (2017) and the Spatial Assessment Need for Schools (2018). Maps are illustrative. The approved application is still valid providing it complies with the conditions.

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									<p>the opportunity for the Council's wider objectives to be supported, by contributing further home, including affordable housing, along with CIL payments and S106 contributions, each benefiting the local area. Figure 24 of the site allocation now includes the positioning of local pedestrian/cycling routes intersecting through the site, an additional requirement on the Regulation 18 Local Plan. The need for improved pedestrian and cycling routes is set out within the Design Principles for the site allocation, carried through from the Managing Development Document, specifically noting the development will be expected to 'improve walking and cycling connections to, from and within the site, specifically to address permeability through the site'. The extant permission includes a number of approved parameter plans, which secure the locations of pedestrian public routes, and primary and secondary cycle routes, around and through the site, in which the proposed site allocation map is not fully consistent with. It is therefore not considered necessary to dictate the specific location of such routes through the site, and this should be deleted from the site allocation map. Figure 24 also includes the positioning of public squares located along on the eastern boundary along Vaughan Way and the northern boundary along The Highway. Building A of the extant permission, which sits within the location of the proposed public squares along Vaughan Way, has been constructed and is now occupied; whilst Building D, which sits within the location of the proposed public square along The Highway, has received RMA approval and is currently under construction. It is therefore unclear how the specific locations of the public squares have been identified, such locations are not justified, and are not consistent with the extant planning permission and therefore should be deleted from the map. Furthermore, the infrastructure requirements seek the provision of 0.4 hectares of open space, whilst the approved parameter plans within the extant permission identifies the extent of the public realm outside of the plot boundaries, as well as the locations of the public realm and areas of open space across the site. It is therefore not necessary to include the specific locations of areas of open space or public squares on the site allocation map. St George are currently delivering the London Dock site identified within the draft Local Plan, which benefits from an existing planning permission. It is however concerned that the draft Local Plan introduces additional constraints onto the site allocation which are not consistent with the existing planning permission, which may mean the future delivery of this site may be more difficult. These representations on the site-specific allocation cross relate to the Berkeley Group representations (dated</p>			

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									10 November 2017) on the wider Strategic and Development Management Policies, and the two sets of representations should be read alongside each other.			

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1142681	Clare Harrisson	London Borough of Tower Hamlets	LP590	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Justified			My comments relate to the justified part of consultation on the local plan. In particular with reference to “protecting and celebrating our heritage” at the Oval site allocation. The comments on preserving the local heritage need to be more precise and tightened up to better reflect the reality of the site as it is now. A more precise form of wording would also help the Council achieve its heritage objectives going forward. Some amendments also need to be made to the diagram for clarity and to better reflect the layout of the site. The frames of gasholder 2 and 5 are local heritage assets of significant historical interest. Gasholder frame number 2 is the second oldest gasholder frame of its type in the world, and has a distinctive classical column design. Making up a significant element of the Regent’s canal conservation area, they are key to maintaining the area’s unique character, and an important relic of the area’s significant role in London’s industrial past. There is considerable local support for ensuring the survival of the two most important of the gasholder frames (2&5). For example, a local group, the East End Waterway Group, gathered a petition of 3,912 signatures which they submitted in response to earlier consultations on the Local Plan. I have attached some historical background information prepared by a member of that group too. The recent developments in King Cross have shown how developments can be done sensitively to enhance and celebrate similar heritage assets. In Kings Cross one of their gasholders has been used as a frame for a block of flats and another is used as an open space/park. However, beyond the comments above, I wish to commend many aspects of the new local plan. In particular policy D.H2 (5) on affordable housing and estate regeneration. I am pleased to see that the Local Plan specifies that as part of any estate redevelopment there must be an uplift in affordable homes (point c.). I welcome this new policy as it should increase the supply of affordable housing in the Borough. Suggested amendments to Site allocation 1.3: Marian Place Gas Works and the Oval : • respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas; • retain, reuse and enhance the existing heritage assets, including the gasholder INSERT <frames 2 and 5> and associated structures, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated pebbled street and railings; • INSERT <ensure gasholder frames 2. and 5. remain in situ and are utilised as part of new housing or green open space;> • re-use The Oval as new public open space which positively contributes to the surrounding buildings and			Details of the wording for the gasholders and heritage assets is as follows: "retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5 , Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings. With regards to the fifth bullet point it is not necessary to include the words ‘where possible’ between ‘align’ and ‘with’ because the term ‘should’ allows for a degree of flexibility. It is not necessary to refer to having regard to existing heritage assets at the end of the forth and seventh bullet points as recognition of heritage assets are covered by policy S.DH3 as well as the first bullet point. The plans will be amended to state that they are for illustrative purposes only but gasholders will be shown. Also, the strategic and local pedestrian/cycle routes will be amended so that they do not pass through the gasholders. As the plans are for illustrative purposes only, the exact location of the open space will be addressed through the development management process.

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								<p>well-connected to the new open space. The Oval should be fronted by a continuous building line following its footprint; • provide active frontage set back from the canal, and positively frame the open space and The Oval to avoid excessive overshadowing but with due regard to the preservation of existing heritage assets; • improve walking and cycling connections to, from and within the site: these should align where possible with the existing urban grain to support permeability and link with Cambridge Heath neighbourhood centre; • maximise the provision of family homes; • improve biodiversity and ecology within open spaces and green infrastructure; • provide a minimum size of 1 hectare of consolidated open space which is designed to be usable for sport and recreation, INSERT <taking into account the layout of existing heritage assets and their retention;> • integrate the development into the green grid network through new and improved access routes to the canal, the open space and The Oval, together with greening the public realm; and • improve the public realm with active site edges, specifically along Hackney Road, Pritchard's Road, Emma Street and The Oval. In addition, generous pavement and a linear landscaped square should be provided along Hackney Road in order to mitigate the impacts of the heavy through traffic on the narrow street. A number of changes need to be made to figure 25 which accompanies the text above: Ø The gasholders 2 & 5, and other heritage assets should be labelled to scale on the map. As is done on figure 36 Ø The line of pathways could then also be aligned with existing heritage so as not to cut through where the gasholders would be if they remained in situ. Ø It should be made clear on the diagram that the exact positioning of the open green space is indicative only- that the exact location of the open space be flexible to allow the gas holders to remain in situ either as part of open green space OR as part of the development of homes (like what has happened in other parts of London like Kings Cross).</p>			

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1143319	Del Brenner	Regents Network	LP800	PART 4: DELIVERING SUSTAINAB LE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No				This appealing location is focussed on the Regents Canal and dominated by the iconic gas holders, as recognised in the draft plan documents, and both these heritage assets are at risk from unsuitable and unclear development proposals. The stretch of the Regents Canal in Bethnal Green provides an important and valuable open space for the location and for local residents and visitors. It should be noted that this waterway is part of London's Blue Ribbon Network, and identified in the London Plan as of strategic importance to London (LP Policy 7.24, Para 7.70). One of the key attributes of the Regents Canal is that it is recognised as public open space (LP Table 7.2), and as such it designated with the same consideration and protection as a park (LP Policy 2.18, Para 2.86), and this must be recognised when considering development along or in close proximity to the waterway. Both sides of the Regents Canal at this location are not over developed and seriously compromised as many other stretches of the canal unfortunately are. The unwelcome waterside building on the east side of the site is an example of development that is too close to the edge of the canal. The designated open character needs to be retained and protected, and as recognised in the LB Hackney Regent's Canal Conservation Area Appraisal (2009). If the development proposals for the gasworks site outlined in the Local Plan further enclose the Regents Canal corridor then the Local Plan would be considered unsound, as well as not consistent with established regional policy. It is noted that there is a proposed Greenway route along the southern bank of the Regents Canal, and this would only be acceptable as a 'walking and cycling connection' if the cycling is definitely separated from the pedestrians, parents with buggies and children, elderly walkers, disabled etc rather than being categorised as a 'shared path' which ultimately discourages pedestrians - on serious safety grounds as well as comfort. The use of the canalside towpaths on the Regents Canal has been a disastrous failure as a so-called 'shared' route. Unfortunately the canal authority, Canal and River Trust Limited, unhelpfully encourage more cycling on the towpaths. Any proposals for additional boat mooring along the south side of the Regents Canal at this location should be strongly resisted. The lack of control of mooring in London by the canal authorities is incompetent, and is leading to loss of open water space, and congestion in some locations. The canal is first and foremost a navigation, and the active use of the waterway as a transport route and highway should be recognised and promoted. Unfortunately London's canals are becoming inappropriately static. It is of great concern to a considerable number of residents and locals as well as canal users that the iconic No.2	Yes		Heritage assets have been addressed in the design principles, however we propose the following wording: <ul style="list-style-type: none"> retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings; Details of how the gasholders will be used will be addressed at through the development management process. The character of the site is addressed through the design principles and design policies. Any further refinement will be addressed through the development management process. Details of how the pedestrian and cycling routes will be provided/function will be addressed through the development management process Applications for moorings will be considered on their merit and are addressed in policy S.OWS2.

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									<p>and No.5 gasholders are not appointed to be retained and incorporated in the development of the location. These two gasholders are “substantial structures which make a significant impression as you walk along the canal” (Regent’s Canal Conservation Area Appraisal, 2009), and this is upheld by general agreement that they form part of the Regents Canal special character and interest in a recent localised petition with 3,912 signatures, submitted a short while ago. More detailed and expert attributions and character studies that clearly define the potential of retention of the two gasholders are set out in the relevant sections of Historic Waterside Gasholders in LB Tower Hamlets (East End Waterway Group, July 2007). This authoritative and relevant document is strongly supported by the Regents Network and should be considered closely when planning suggestions and design principles for this location are considered. A very sound case is made out for the retention of the two gasholder frames. Apart from relevant policies and recommendations in the London plan concerning heritage assets such as the Bethnal Green Gasholders, there are a number of references in the NPPF of historical significance of such heritage assets that should be conserved “so that they can be enjoyed for their contribution to the quality of life of this and future generations” (NPPF Para 17, Point 10). It is made clear that developments “should respond to local character and history, and reflect the identity of local surroundings and materials” (NPPF Para 58, Point 4). At this gasworks location there is a strong relationship with the historic Regents Canal (approaching its Bicentenary in 2020!) that provided the transport for the thousands of tons of coal to the gasworks for well over a century. This should be celebrated, rather than sidelined. Rather than just preserving the gasholder frames, they could have relevance for the next generations by being put to good use. The great guide frame of No.2 could enclose a “gasholder park” in the same manner as the very successful gasholder park enclosed by the listed No.8 Gasholder beside the Regents Canal at Kings Cross. It makes a wonderful facility and a great attraction (see photo). There is unfortunately a drawback with the Kings Cross facility as the new buildings that surround No.8 do not suit the heritage character, and detract from the full beauty of the very skilfully restored cast iron guideframe. At Bethnal Green there needs to be a deal more care and consideration of any development in the vicinity of the ‘Gasholder Park’. The No.5 gasholder at Bethnal Green would lend itself to being a frame for a circular block of flats in the same manner as the flats inside the Triplet Gasholder at Kings Cross. Again this has proved a great success although there were some doubts at the outset. These prominent</p>			

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									gasholders have become part of Bethnal Green, and it would be tragic if they went the way of many other gasholders around London and the country, many of which a sorely missed. At the local level, the new Local Development Framework (LDF) of Tower Hamlets states that 'the Council will protect and enhance the historic environment of the borough'. This should be taken at its face value and made specific in consideration of the gasholders. Also the Design Principles for the Bethnal Green site state that "development should protect, enhance and integrate heritage assets on site and in the surrounding areas within the London Borough of Hackney. Specifically the industrial heritage presented by the gas holders within the Regents Canal Conservation Area should be acknowledged within the design and layout of the site", which is fine as far as it goes. However it does not directly mention or discuss the issue of retaining any gasholders, or any good reason for not preserving them. This is a serious shortcoming, as well as a disappointment in the Hackney authorities.			
1053309	Jane Wilkin	Environment Agency	LP258	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No				NOTE THAT THE EA DO NOT CONSIDER THE PLAN TO BE UNSOUND BUT HAVE MADE THE FOLLOWING COMMENTS: We raised in our previous comments that these sites are adjacent to watercourses which have Water Framework Directive actions assigned to help improve the status of the waterbody as set out in the evidence base – the Thames River Basin Management Plan. We note that our requests for additional wording in the site allocations relating to delivering Water Framework Directive actions have not been incorporated. We feel this is a missed opportunity to ensure that the allocated sites include specific actions to ensure that the objectives within the Thames River Basin Plan can be delivered. Particularly as Regulation 17 of the Water Environment Regulations 2003 (WFD) places a duty on local planning authorities to 'have regard to' River Basin Management Plans (RBMP). We do not consider that the WFD actions in the evidence base have been fully drawn upon within the design guidelines and development considerations for these sites. The design principles should be expanded for these sites to highlight the opportunities for improvements to the watercourse through the development of the site. Suggested wording: Development will be expected to implement the actions identified in the River Basin Management Plan to support delivery of the objectives of the plan, in accordance with Regulation 17 of the Water Environment Regulations 2013.	Yes		Agreed. The following changes are proposed to be included in the delivery considerations: - Development will be expected to implement the actions identified in the Thames River Basin Management Plan to support delivery of the objectives of the plan, in accordance with regulation 17 of the Water Environment Regulations 2013. NB. The following wording will also be added in accordance with the regulation 18 response: An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

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1142174	Liz Fuller	SAVE Britain's Heritage	LP146	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Consistent with national policy			Figure 25 and the related Design Principles should be changed to ensure the retention and incorporation of the No2 and No5 gasholders as requested by the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031 (uploaded) and for all the reasons set out in the relevant sections of "Historic Waterside Gasholders in LB Tower Hamlets" (East End Waterway Group July 2017), including resubmitted petition and compliance with National Planning Policy Framework para 58 and PPG 007, as set out in 12 May 2017 letter from the Victorian Society (sent in separate attachment). Furthermore, the No2 and No5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent's Canal Conservation Area "The Regent's Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canal's special character and interest" (Regent's Canal Conservation Area Appraisal). They should therefore be conserved "so that they can be enjoyed for their contribution to the quality of life of this and future generations" (NPPF para 17 tenth bullet point); and "put to viable uses consistent with their conservation" (NPPF para 126 first bullet point). As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as "land where development would be inappropriate...because of ...its historic significance", (NPPF para 157 seventh bullet point).The No.2 Gasholder at Bethnal Green is believed to be the world's second oldest surviving gasholder. Consequently, the following changes are proposed to reflect national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE 25 1. Please add correctly sized and located rings to show the two gasholder guide frames (as done on Figure 36) 2. Please move the open space to the west to include the No. 2 gasholder guide frame and exclude the No. 5 gasholder guide frame 3. Please replan the strategic routes and local routes to avoid passing through the two gasholder guide frames 4. Please replan the three canalside routes as the single route described below DESIGN PRINCIPLES 1. Second bullet point, please remove "reuse and enhance" and "including the gasholders" and replace with the following: "retain in situ and conserve the entire No. 2 columnar guide frame (on its in-ground brick tank) and incorporate into the open space" "retain in situ and	Yes		Amended wording of the gasholders to be as follows : <ul style="list-style-type: none"> retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings; <p>The plans will be amended to show the gasholders.</p> <p>The plans are for illustrative purposes and the exact location of the open space will be agreed through the pre-application/planning application process.</p> <p>Details of how the canal side route will function will be discussed through the development management process.</p> <p>With regards to the fifth bullet point It is not considered necessary to include 'where possible' between the words 'align' and 'with', because the word 'should' allows for flexibility.</p> <p>The finer details of how the gasholders will be used within the development will be agreed through the pre-application/planning application process.</p> <p>The petition that was previously submitted has been noted.</p>

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									conserve the entire No.5 lattice guide frame (on its in-ground concrete tank) and either incorporate into the open space or find an alternative, creative reuse" 2. fifth bullet point, please insert "where possible", between "align" and "with" 3. eighth bullet point, please remove "consolidated open space which is designed to be usable for sport and recreation" and replace with: " open space for sport and active recreation, including open space (in the No.2 columnar guide frame) for passive recreation like 'gasholder park at King's Cross'. see additional information sent by e-mail with reference E_Liz Fuller_East End Waterway Group_14112017_additional information			
1142064	Lucy Rogers		LP73	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Consistent with national policy			This part of the Local Plan is not sound (i.e positively prepared and consistent with national policy) with reference to "protecting and celebrating our history and heritage" at the Bethnal Green Holder Station. Specifically, Figure 25 and the related Design principles need to be changed to ensure the retention and incorporation of the No.2 and No.5 gasholders: as requested in the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031; and for all the reasons set out in the relevant sections of Historic Waterside Gasholders in LB Tower Hamlets (East End Waterway Group July 2017), including resubmitted petition; and compliance with National Planning Policy Framework para. 58 and PPG 007, as set out in 12 May 2017 letter from The Victorian Society (please see attached 9 page document for report, petition and letter). Furthermore, the No.2 and No.5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent's Canal Conservation Area "The Regent's Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canals special character and interest" (Regent's Canal Conservation Area Appraisal). They should therefore be conserved "so that they can be enjoyed for their contribution to the quality of life of this and future generations" (NPPF para.17 tenth bullet point); and "put to viable uses consistent with their conservation" (NPPF para. 126 first bullet point). As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as "land where development would be inappropriate...because of its...historic significance" (NPPF para. 157 seventh	No	This part of the Local Plan is not sound (i.e positively prepared and consistent with national policy) with reference to "protecting and celebrating our history and heritage" at the Bethnal Green Holder Station. Specifically, Figure 25 and the related Design principles need to be changed to ensure the retention and incorporation of the No.2 and No.5 gasholders: as requested in the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031; and for all the reasons set out in the relevant sections of Historic Waterside Gasholders in LB	The first design principle explicitly refers to integrating heritage assets on the site. In addition, policy S.DH3 refers to the preservation on designated and non-designated heritage assets. However, consideration will be given to amending the wording.Proposed wording:: "retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5 , Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated settled pebbled street and railings;" The plans are for illustrative purposes but will be amended to show the location of the gasholders. Details of how the canal side route, as well as the pedestrian/cycling route will function will be discussed through the development management process. Matters regarding the time of overshadowing will be addressed through the development management process. It is not necessary to include the words 'where possible' between 'align' and 'with' because the word 'should' allows for flexibility. Details of how the open space will be used/function will be agreed through the development management process.

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								<p>bullet point). (NB Why can we only choose one way that the document is not sound?) I would also say that the proposed Marian Place plan is not justified - as it has ignored the petition of 3917 signatures submitted to the borough at the last consultation. There is no evidence that the neighbouring borough of Hackney has been consulted. The views of the Gas Holders affect the borough of Hackney equally if not more so, as they are by the canal and mostly viewed from the opposite side of the canal in Hackney. not effective - as it does not concord with policy to preserve the historic environment, specifically the industrial history of the borough referred to in this Plan. THE CHANGES SET OUT BELOW would make this part of the Local Plan positively prepared and consistent with national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE 25 1. Please add correctly sized and located rings to show the two gasholder guide frames (as done on Figure 36) 2. Please move the open space to the west to include the No. 2 gasholder guide frame and exclude the No. 5 gasholder guide frame 3. Please replan the strategic routes and local routes to avoid passing through the two gasholder guide frames 4. Please replan the three canalside routes as the single route described below DESIGN PRINCIPLES 1. Second bullet point, please remove "reuse and enhance" and "including the gasholders" and replace with the following: "retain in situ and conserve the entire No. 2 columnar guide frame (on its in-ground brick tank) as a 'gasholder park', like that at King's Cross" "retain in situ and conserve the entire No.5 lattice guide frame (on its in-ground concrete tank) and insert a well-designed circular block of flats, like those at King's Cross" 2. fourth bullet point, please remove "provide active frontage set back from the canal" and replace with: "provide a single pedestrian/cycling route (to serve as a waterfront walk, strategic and local pedestrian/cycling route) along the short western part and long eastern part of the canal's south bank and around the western, southern and eastern parts of the No. 5 lattice guide frame" NB The blocks inside the three gasholder guide frames at King's Cross do not have public rights of way along their part of the canal. 3. fourth bullet point, please remove "to avoid excessive overshadowing" and replace with: "so that only the circular block of flats in the No.5 lattice guide frame would overshadow the open space in the morning and The Oval in the afternoon" 4. fifth bullet point, please insert "where possible", between "align" and "with" 5. eighth bullet point, please remove "consolidated open space which is designed to be usable for sport and recreation" and replace with: "</p>		<p>Tower Hamlets (East End Waterway Group July 2017), including resubmitted petition; and compliance with National Planning Policy Framework para. 58 and PPG 007, as set out in 12 May 2017 letter from The Victorian Society (please see attached 9 page document for report, petition and letter). Furthermore, the No.2 and No.5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent's Canal Conservation Area "The Regent's Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canals special character and interest" (Regent's</p>	

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									open space for sport and active recreation, including open space (in the No.2 columnar guide frame) for passive recreation like 'gasholder park at King's Cross'.		Canal Conservation Area Appraisal). They should therefore be conserved "so that they can be enjoyed for their contribution to the quality of life of this and future generations" (NPPF para.17 tenth bullet point); and "put to viable uses consistent with their conservation" (NPPF para. 126 first bullet point). As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as "land where development would be inappropriate...because of its...historic significance" (NPPF para. 157 seventh bullet point).The changes set out below would make this part of the Local Plan positively prepared and consistent with national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE 25 1. Please add correctly sized and	

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											<p>“provide active frontage set back from the canal” and replace with: “provide a single pedestrian/cycling route (to serve as a waterfront walk, strategic and local pedestrian/cycling route) along the short western part and long eastern part of the canal’s south bank and around the western, southern and eastern parts of the No. 5 lattice guide frame” NB The blocks inside the three gasholder guide frames at King’s Cross do not have public rights of way along their part of the canal.</p> <p>3. fourth bullet point, please remove “to avoid excessive overshadowing” and replace with: “so that only the circular block of flats in the No.5 lattice guide frame would overshadow the open space in the morning and The Oval in the afternoon”</p> <p>4. fifth bullet point, please insert “where possible”, between “align” and “with”</p> <p>5. eighth bullet point, please remove “consolidated open space which is designed to be usable for sport and recreation”</p>	

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											and replace with: "open space for sport and active recreation, including open space (in the No.2 columnar guide frame) for passive recreation like 'gasholder park at King's Cross'.	
1141939	Philip Mernick	East London History Society	LP642	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Positively prepared; Consistent with national policy			This part of the Local Plan is not sound (i.e positively prepared and consistent with national policy) with reference to "protecting and celebrating our history and heritage" at the Bethnal Green Holder Station. Specifically, Figure 25 and the related Design principles need to be changed to ensure the retention and incorporation of the No.2 and No.5 gasholders: as requested in the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031; and for all the reasons set out in the relevant sections of Historic Waterside Gasholders in LB Tower Hamlets (East End Waterway Group July 2017), including resubmitted petition; and compliance with National Planning Policy Framework para. 58 and PPG 007, as set out in 12 May 2017 letter from The Victorian Society (please see attached 9 page document for report, petition and letter). Furthermore, the No.2 and No.5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent's Canal Conservation Area 'The Regent's Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canals special character and interest"(Regent's Canal Conservation Area Appraisal). They should therefore be conserved "so that they can be enjoyed for their contribution to the quality of life of this and future generations" (NPPF para.17 tenth bullet point); and "put to viable uses consistent with their conservation" (NPPF para. 126 first bullet point). As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as i:land where development would be inappropriate ... because of its ... historic significance" (NPPF para. 157 seventh bullet point). The No. 2 gas holder of Bethnal Green is believed to be the world's second oldest surviving gas holder. The changes set out below would make this part of the Local Plan positively prepared and	Yes		<p>The first design principle explicitly refers to integrating heritage assets on the site. In addition, policy S.DH3 refers to the preservation on designated and non-designated heritage assets. However, consideration will be given to amending the wording.</p> <p>Proposed wording:</p> <ul style="list-style-type: none"> retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings; <p>The plans are for illustrative purposes but will be amended to show the location of the gasholders.</p> <p>Details of how the canal side route, as well as the pedestrian/cycling route will function will be discussed through the development management process.</p> <p>Matters regarding the time of overshadowing will be addressed through the development management process.</p> <p>With regards to the fifth bullet point, it is not necessary to include the words 'where possible' between 'align' and 'with' because the word 'should' allows for flexibility.</p> <p>Details of how the open space will be used/function will be agreed through the development management process.</p>

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								<p>consistent with national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE25 1. Please add correctly sized and located rings to show the two gasholder guide frames (as done on Figure 36) 2. Please move the open space to the west to include the No. 2 gasholder guide frame and exclude the No. 5 gasholder guide frame 3. Please replan the strategic routes and local routes to avoid passing through the two gasholder frames 4. Please replan the three canalside routes as the single route described below DESIGN PRINCIPLES 1. Second bullet point, please remove "reuse and enhance" and "including the gasholders" and replace with the following:"retain in situ and conserve the entire No. 2 columnar guide frame (on its in-ground brick tank) as a 'gasholder park', like that at King's Cross""retain in situ and conserve the entire No.5 lattice guide frame (on its in-ground concrete tank) and insert a well-designed circular block of flats, like those at King's Cross"2 fourth bullet point, please remove "provide active frontage set back from the canal" and replace with: 11provide a single pedestrian/cycling route (to serve as a waterfront walk, strategic and local pedestrian/cycling route) along the short western part and long eastern part of the canal's south bank and around the western, southern and eastern parts of the No. 5 lattice guide frame" NB The blocks inside the three gasholder guide frames at King's Cross do not have public rights of way along their part of the canal. 3. fourth bullet point, please remove "to avoid excessive overshadowing" and replace with:"so that only the circular block of flats in the No.5 lattice guide frame would overshadow the open space in the morning and The Oval in the afternoon"fifth bullet point, please insert "where possible". between "align" and "with"5. eighth bullet point, please remove "consolidated open space which is designed to be usable for sport and recreation" and replace with: 11 open space for sport and active recreation, including open space (in the No.2 columnar guide frame) for passive recreation like 'gasholder park at Kings Cross' .</p>			

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1053788	Steve Craddock	The Canal & River Trust	LP373	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	N/A			We question why reference to the Regent's Canal Conservation Area has been removed from the development guidance for this site. Whilst the second bullet point refers to heritage assets, it fails to mention the Regent's Canal itself, with the only reference to it being in relation to the Victorian buildings adjacent. Proposals should be sensitive to the impact that redevelopment will have on the character of the Conservation Area. Given that this will be required by other policies in the plan (such as S.DH3), we do not suggest that this is a soundness issue. We welcome the references to the gas holders that have been added to the development guidance. These form part of the Conservation Area and, as the Council's Conservation Area Character Appraisal notes, it is "the association between all these elements which form part of the canal's special character and interest in this location". We suggest that the development guidance should be amended so that heritage assets will be retained in situ, with relocation only to be considered as a last resort. We suggest that "pebbled" should be changed to "cobbled" in the 2nd bullet point. We understand that the Council is to carry out repairs to a wall at road level in this area (above a former entrance to a wharf) that has been struck by a vehicle in the past and is understood to be structurally unsound. We would welcome confirmation of this.				Agree to make reference to the conservation area. Proposed change: <ul style="list-style-type: none"> respond positively to the existing special character of the Regents Canal conservation area and its setting, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas. . Support regarding reference to the gasholders noted <p>It is not considered necessary to include the word in situ as the exact location of the gasholders will be determined through the development management process.</p> <p>The reference to 'pebbled' street will be amended to 'setted' and will read as follows: .</p> <p>"retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings;</p>
1142559	Tim Brennan	Historic England	LP451	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	N/A			Part of this site is within the Regent's Canal Conservation Area, which should be referenced within the design principles at page 188.				Agreed. Proposed wording: <ul style="list-style-type: none"> respond positively to the existing special character of the Regents Canal conservation area and its setting, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas.

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1137746	Tom Ridge	East End Waterway Group	LP923	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Positively prepared; Consistent with national policy			This part of the Local Plan is not sound (i.e positively prepared and consistent with national policy) with reference to “protecting and celebrating our history and heritage” at the Bethnal Green Holder Station. Specifically, Figure 25 and the related Design principles need to be changed to ensure the retention and incorporation of the No.2 and No.5 gasholders: as requested in the East End Waterway Group petition with 3,912 signatures submitted in response to the previous consultation on the Local Plan 2031; and for all the reasons set out in the relevant sections of Historic Waterside Gasholders in LB Tower Hamlets (East End Waterway Group July 2017), including resubmitted petition; and compliance with National Planning Policy Framework para. 58 and PPG 007, as set out in 12 May 2017 letter from The Victorian Society (please see attached 9 page document for report, petition and letter). Furthermore, the No.2 and No.5 gasholders (heritage assets nominated for local listing) make a positive contribution to the character and appearance of the Regent’s Canal Conservation Area “The Regent’s Canal Conservation Area is a linear conservation area with the boundaries drawn tightly around the Canal and features associated with it including bridges, locks, lock cottages, warehouses and industrial features such as the Bethnal Green gasholders. It is the association between all these elements which form part of the canals special character and interest” (Regent’s Canal Conservation Area Appraisal). They should therefore be conserved “so that they can be enjoyed for their contribution to the quality of life of this and future generations” (NPPF para.17 tenth bullet point); and “put to viable uses consistent with their conservation” (NPPF para. 126 first bullet point). As heritage assets, the two historic gasholder guide frames should also be correctly identified on Figure 25 as “land where development would be inappropriate...because of its...historic significance” (NPPF para. 157 seventh bullet point). The changes set out below would make this part of the Local Plan positively prepared and consistent with national policy, in particular NPPF tenth Core Planning Principle (para.17); NPPF para. 58, fourth bullet point (and PPG 007); NPPF para.126, first bullet point; NPPF para.157, seventh bullet point. FIGURE 25 1. Please add correctly sized and located rings to show the two gasholder guide frames (as done on Figure 36) 2. Please move the open space to the west to include the No. 2 gasholder guide frame and exclude the No. 5 gasholder guide frame 3. Please replan the strategic routes and local routes to avoid passing through the two gasholder guide frames 4. Please replan the three canalside routes as the single route described below DESIGN PRINCIPLES 1. Second bullet point, please remove “reuse and enhance” and	No		Proposed wording for the gasholders: <ul style="list-style-type: none"> retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated setted pebbled street and railings; <p>The plans will be amended to show the gasholders and the pedestrian and cycle routes only going to the edge of the gasworks. The plans are for illustrative purposes and the exact location of the open space will be agreed through the pre-application/planning application process.</p> <p>It is not considered necessary to amend the wording relating to active frontages as active frontages can include pedestrian and cycling routes, and this will be addressed through the development management process. With regards to the fifth bullet point, it is not necessary to include the words ‘where possible’ between ‘align’ and ‘with’ because the word ‘should’ allows for flexibility. The proposed wording relating to residential units being incorporated into the gasholders is not considered to be appropriate as it has not been determined whether the gasholders will incorporate flats.Open space As evidenced in the boroughs Parks and Open Space Strategy 2017-2027 Tower Hamlets needs more playing pitches to meet existing local demand. Population growth is forecast to further increase this demand. In addition to this the borough currently has an open space deficiency which constrains the scope of the council to grow the playing pitch offer without displacing other park users in the borough.In order to mitigate this deficiency Marian Place Gas Works along with other key development sites in the borough has been identified to deliver a minimum of 1ha of consolidated open space which is designated to be usable for sport and recreation along with other green infrastructure requirements in the Local Plan</p>

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1142327		St. William	LP198	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Effective; Consistent with national policy			<p>a) Introduction and Scope We are writing on behalf of St. William in response to the consultation on your draft Local Plan. St. William, the joint venture between National Grid and the Berkeley Group, has an interest in three of the site allocations in the Draft Local Plan: • Marian Place Gas Works and the Oval • Leven Road Gas Works • Bow Common Gasworks These representations relate to the site-specific allocations for those sites. The Berkeley Group of which St. William is part, has submitted representations on the Strategic and Development Management policies in the revised Draft Plan. These cover four critical policy areas in the Plan which are of concern: • Developer contributions and planning obligations • Design • Housing • Schools, Open Space, and Other Community Facilities All of these issues also cross-relate to the site-specific allocations, which illustrate some of the group's key concerns, and therefore the two sets of representations should be read alongside one another. b) Overview The table below shows the sites in which St. William has an interest. Leven Road and Bow Common Gasworks are in single ownership whilst the Gasworks part of the Marian Place/Oval site comprises approximately half of the site allocation. St. William welcomes their allocation in the Draft Plan. Site Area Status Capacity Leven Road Lower Lea Valley Opportunity Area & Poplar Housing Zone 1,485* Bow Common Poplar Housing Zone 468* Marian Place/Oval City Fringe Opportunity Area 630* Total 2,583 * Indicative homes identified in LBTH Viability Study (2017) As current or former Gasworks sites they all have very significant remediation costs and also ongoing requirements to provide gas infrastructure including accessible underground gas pipelines and operational pressure reduction stations (PRS), which place ongoing development restrictions to accommodate the required easements and safety zones on parts of the sites. This reduces the developable area assumed by the Council. The retention of any Gasholders also has very significant cost implications. Even if not re-purposed for an active use their retention requires them to be dismantled, transported significant distances for refurbishment, reinforced when returned to the site during reassembly, and maintained and insured by future residents. For the two sites in the Draft Plan where the policy currently requires retention of some of the Gasholders this does not appear to have been taken into account in the viability assessments. St. William is currently in pre-application discussions with the London Borough of Tower Hamlets on the Leven Road site. The other two sites are still at pre-planning stage. The Draft Local Plan does not identify housing targets for the individual site allocations other than to note that they are sites with capacity for over 500 homes</p>			<p>Design principles: The proposed amendments are considered to make it clear which heritage assets are to be retained:</p> <ul style="list-style-type: none"> retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders No. 2 and No.5, Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated settled pebbled street and railings; <p>The site is within the conservation area and has to respond to its special character. Scale, height and massing are intrinsic to the special character. Whilst developments are not expected to replicate it, they are expected to respond positively to the conservation area. As such reference to scale height and massing should be retained.</p> <p>The site is not within a tall building zone and it is not considered necessary to make reference to tall buildings. There is a policy that relates to tall buildings outside of designated Tall Building Zones and applications will need to demonstrate how they address the requirements of the policy.</p> <p>The council has allowed for significant remediation costs for all three of the site allocations which are on gas works sites. In terms of the ongoing requirements to provide gas infrastructure on site, the council are reviewing the cost of retaining the gasholders.</p> <p>The Council notes the requirement to retain the gasholders and are considering information relating to the costs of doing so. The Council notes that the costs of this requirement could vary widely depending on the extent of the retention which will depend on the specific design of the site.</p> <p>Further details regarding capacity will be addressed through the application process. However, the Council is confident in its approach in terms of defining site capacities for viability testing purposes.</p> <p>Disagree that the sites are not deliverable due to the scale of obligations. Marian Place</p>

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								<p>(para 2.11). However, the Viability Study (2017) includes indicative numbers of homes in the site-specific assessments and these are shown in the table above. As far as we are aware none of the published evidence base identifies the contribution these sites are expected to contribute to the housing trajectory contained in Appendix 7 of the Draft Plan. However, both Bow Common Gasworks and Leven Road Gasworks are identified in Appendix B of the Five-Year Housing Land Supply and Housing Trajectory Statement as sites which have been assessed as being able to provide deliverable supply within the plan period. The evidence base document, London Borough of Tower Hamlets Housing Delivery Strategy (September 2017) sets out in Section 8 how the Council intends to address its shortfall in supply. It specifically identifies (in paragraphs 8.18 to 8.20) the Poplar Housing Zone as a location where interventions are likely to mean that delivery will be greater than currently assumed. It also suggests that the GLA may produce an updated Lower Lea Valley Opportunity Area Planning Framework (OAPF) focused on Poplar Riverside to maximise the opportunity and the delivery of family housing. Paragraphs 8.4 and 8.5 of the strategy note that average densities are used for site allocations without planning permission and where no further capacity details are available but that it is likely that: "these sites may deliver more homes than has been currently assumed". If we use the assumptions in the Viability Study, which are based on assumed density ratios, they equate to just under 5% of the total known projected housing supply in the Borough (Draft Local Plan, Appendix 7), and 20% of capacity on site allocations without permission. They are therefore critical to the delivery of the Local Plan targets, particularly as the Council is relying on over 8,330 homes being delivered as windfalls or unidentified sites. It is therefore critical that the indicative numbers above are seen as a minimum and the capacity of allocated sites is maximised. Our overriding concern is that the Council's own evidence for these sites when it produced its Managing Development DPD demonstrated that the weight of obligations placed on the sites at that time meant that they weren't viable. The new Draft Plan adds further requirements and restrictions on the sites, which reduce developable site area, limit development capacity and add further obligations. The Council has also introduced its Community Infrastructure Levy charging schedule, and has stated that it will be updating this alongside the Local Plan. St. William is very keen to continue to work positively with the Council to ensure that the capacity of the sites to deliver housing, including affordable housing, and wider placemaking requirements, including social</p>			<p>has been identified as being able to viably accommodate the Council's policy requirements. Whilst the Leven Road and Bow Common Gas Works sites are identified as not being able to viably deliver 35% affordable housing, the plan is inherently flexible and can account for these factors when the site comes forward for development.</p> <p>The Viability Study does not need to account for the cost of open space or enhanced public realm – to the extent that these elements of the site are infrastructure then they will be funded using the Community Infrastructure Levy which has been accounted for in full. Any employment uses on this site would be de minimise relative to the residential uses on site. Accounting for these employment uses will have minimal impact on the viability of the scheme but if anything would make the site marginally more viable.</p> <p>The capacity of the site will be addressed further through the development management process. However, the Council is confident in its approach in terms of defining site capacities for viability testing purposes.</p> <p>The Council disagrees; costs for land remediation have been appropriately taken into account. The approach to land value is the most appropriate for testing Local Plans and the approach is very much in line with the Viability Testing Local Plans: Advice for Planning Practitioners document produced by the Local Housing Delivery Group Harman guidance on testing Local Plans. This guidance recommends that BLVs are "based on a premium over current use values" with the "precise figure that should be used as an appropriate premium above current use value [being] determined locally". The guidance considers that this approach "is in line with reference in the NPPF to take account of a "competitive return" to a willing land owner". The use of a 20% premium is consistent with testing associated with numerous other Local Plans and CIL Charging Schedules.</p>

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									<p>infrastructure and open space can be achieved whilst ensuring that the sites are viable and deliverable. At present St. William is of the view that the Plan is unsound in relation to these three site allocations, because it is not effective (i.e. deliverable) and because it is inconsistent with the National Planning Policy Framework (NPPF), paragraph 173 which states: Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.” We set out below some constructive suggestions in relation to each site which we believe can help make the Plan sound. c) Marian Place and Oval Gasworks i) Site Allocation 1.3 The site allocation (“SA1.3”) for Marian Place and Oval Gasworks covers at least 3.75 hectares. The St. William site (“the Site”) covers approximately half (1.85 ha), (49% of SA1.3). The Site is not occupied by buildings or employment floorspace. It is occupied by Sui Generis gas holder infrastructure. It is the only unused vacant site in SA1.3. It is the largest site and in single ownership. There are considerable site constraints relating to the existing operational gas equipment. This sterilises large sections of the site reducing the developable area and ability to deliver the strategic objectives of SA1.3. We would note that SA1.3 extends beyond the adopted Local Plan Site Allocation 2 Marian Place to include land at Hackney Road, Emma Street and Pritchard’s Road. The site area has remained at 3.75ha in this draft of the Local Plan but we suggest that the Council may wish to review this. ii) Effective Delivery The policy constraints imposed by SA1.3; D.H2 Affordable Housing; S.EMP1 Local Employment Location; and D.DH6 Tall buildings could prevent the effective delivery of housing at the Site required by Policy S.SG1: Areas of Growth and Opportunity within Tower Hamlets, Policy S.H1: Meeting Housing Needs, and strategic policy for the City Fringe Opportunity Area. As noted below the Gasworks Sites already have significant abnormal costs and constraints which are compounded by these additional requirements. Flexibility should be introduced within SA1.3 to enable the policy objectives within the Plan to be delivered at the Site.</p>			<p>Open space:</p> <p>The plans are indicative and the exact location of the open space will be addressed through the development management process. Opportunities for land assembly can be explored.</p> <p>It has been noted that there is a requirement to retain the gasholders, however the minimum area for open space has been reduced from 1.2ha in the adopted Managing Development Document to 1ha in the new Local Plan .</p> <p>The reference to ‘sport’ will not be removed. In line with the open space policies, strategic open spaces should provide opportunities for sport, however the type of provision will be addressed through the development management process.</p> <p>The gasholders are not considered to be employment uses, however employment uses will be expected on the site. Proposed wording:</p> <ul style="list-style-type: none"> • Employment: a range of new floorspace sizes, including suitable units suitable for the needs of small-medium enterprises, start-ups and creative and tech industries <p>Proposed change to site area: Site area should states 4.4 hectares</p> <p>Matters regarding family housing will be discussed further at the examination in public.</p>

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									<p>iii) Housing SA1.3 does not include an indicative residential development capacity for new homes. It would be helpful for the purposes of the Plan examination if, in the evidence base the Council set out its assumptions for this, and the other Gasworks sites including housing capacity and other infrastructure requirements to allow a proper assessment of the soundness of the plan and whether the burden of obligations is deliverable. Whilst having some flexibility in the Policy itself is reasonable it is difficult to assess whether the site is deliverable without this. By definition SA1.3 can accommodate at least 500 units (para 2.11 of the Local Plan). Table 1 Minimum Number of Additional Homes Across Sub-Areas (2016 - 2031) specifies a minimum of 9,330 new homes for the City Fringe. Paragraph 2.8 makes reference to Site Allocations 1.1 - 1.4 delivering at least 3,790 new homes. As noted above the Local Plan Policies Viability Assessment uses a capacity of 630 homes for SA1.3. There is a reasonable prospect that the site could deliver more homes. 630 homes across the 3.75ha site equates to a density of 168 dwellings per hectare. This is well below the 260u/ha (Urban Location PTAL 4-6) and 405u/ha (Central Location PTAL 4-6) density range of the adopted London Plan. 630 homes may not be representative of SA1.3's full development potential. There is concern that the delivery of 630 homes might be restricted as a result of the obligations set out in SA1.3 and other policies within the Plan. This could undermine the Council's Five-Year Housing Land Supply and Housing Trajectory Statement: Position at August 2017. SA 1.3 seeks to maximise family homes. This is not in accordance with S.H1 Meeting Housing Needs which requires a mix of sizes of all housing; and D.H2 Affordable Housing Part 3 Table which requires a range of unit sizes. Family homes will be an important component of SA1.3, but only as part of a balanced housing mix which maximises site capacity. iv) Open Space The 2017 Open Space Strategy identifies that SA1.3 is bound by Regents Canal a designated publicly accessible open space and waterway. It lies adjacent to sites which are 5 minutes walking distance from 1ha and 2ha open spaces and are within 15 minutes' walk of a Major Park. It is well connected to open space. Figure 13 An Enhanced Network of Open Spaces and Water Spaces allocates SA1.3 for a Strategic Green Grid Project at SA1.3. SA1.3 proposes a minimum 1 ha of consolidated open space which is designed to be usable for sport and recreation. The benefits of open space to development are supported by St. William. However such Open Space must reflect the high density nature of the site and be equitably shared across the allocation. The site is already well located for access to active sports uses with Victoria Park,</p>			

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									<p>Haggerston Park, Weavers and London Fields all within 1 kilometre. We would therefore suggest the reference to use for 'sport' could be removed. SA 1.3 Figure 25 suggests that the 1 ha of open space is located solely on the Site. This would reduce the developable area of the Site further and would represent a disproportionate infrastructure requirement. A proportionate requirement would be for the Site to accommodate around half of this for the Strategic Green Grid Project. Figure 25 should be amended to refer to an indicative location of open space, noting that each site within SA1.3 should contribute proportionally to the infrastructure requirement. We would note that no allowance appears to have been made for the cost of Open Space or enhanced public realm in the Council's Viability Assessment other than a deduction of land from the developable area and a general allowance for 'externals'. v) Employment Floorspace Policy S.EMP1: Creating Investment and Jobs Local Employment Locations (LEL) states that Cambridge Heath "provides a range of office, industrial and studio workspaces meeting the needs of businesses serving a more local need, start-ups, small-to-medium enterprises and creative industries." Figure 11 Distribution of Employment Hubs and Locations includes SA1.3 within the Cambridge Heath LEL. S.EMP1 describes the land outside of the Site within SA1.3. This is economically active and thriving and contributes to the City Fringe Tech City which is emerging as one of London's most significant areas for economic growth and technology start-up clusters. The Site does not contain such uses. It is a disused Sui Generis Gasworks site, and should be excluded from the LEL allocation. At the very least the Policy should confirm that the area of the Gasworks is not counted as employment floorspace that is required to be replaced. The existing economic uses at SA1.3 are protected by the proposed Cambridge Heath Local Employment Location (LEL) Allocation. The loss or reduction of active viable employment floorspace within LELs is resisted by Policy D.EMP3 Loss of Employment Floorspace. This policy could limit redevelopment of this land for housing and its delivery towards the 630 home minimum target. This places greater emphasis on the St. William site to contribute to housing delivery. Policy D.EMP4 Redevelopment Within Designated Employment Area (Part 4) states that redevelopment of Local Employment Locations (LELs) to include non-employment uses will only be supported if the existing level of employment floorspace is re-provided on-site. This would not apply to the Site as no floorspace exists at present. Part (f) relates to Cambridge Heath and requires "a range of units including industrial floorspace; small-to-medium enterprise space and studios to meet the needs of</p>			

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									<p>creative industries within the Cambridge Heath LEL". The application of this policy for the Site should be applied flexibly otherwise it would limit the opportunity to meet other Plan policies. Whilst St. William support the concept of a mixed-use residential led development as set out within SA1.3, this site comprises a disused sui generis gasworks which has not supported local employment for a number of years. Therefore, significant levels of employment should not be sought on the Gasworks site. No allowance appears to have been made for this policy requirement in the Council's Viability Assessment. vi) Heritage SA1.3 states that development at the Site is expected to "retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures.... including the associated pebbled street and railings". No allowance appears to have been made for this policy requirement in the Council's Viability Assessment. This requirement as drafted is potentially so broad, encompassing 'associated structures' that no development would be possible on the Gasworks part of the site at all. Whilst part of the site is in a Conservation Area there are currently no designated heritage assets within the site and the Gasholders themselves were issued with an Immunity from Listing by English Heritage in 2015 (COIL Number: 1424572). As Berkeley Group has noted in relation to strategic policy SDH.3 the Council should distinguish between designated and non-designated heritage assets and should therefore remove the reference in the policy to the Gasholders and associated structures. vii) Density and Tall Buildings Design principle (i) states that development will be expected to "respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and specifically integrate heritage assets on site and in the surrounding areas". As we have noted the site is in an Opportunity Area and is also, by definition, a strategic site allocation. St. William has an interest in approximately half of the site, and it is likely that proposals for other neighbouring sites will change the site context and the site is on a scale to in part set its own context, consistent with the Mayor of London's Housing SPG. It is therefore suggested that the policy should refer to the existing and changing character of the area, and that specific reference to 'scale, height and massing' should be removed. Policy D.DH6: Tall buildings allocates Tall Building Zones. SA1.3 is not within a Tall Building Zone. Part 3 (a-d) of the policy will apply to SA1.3. Development of tall buildings at SA1.3 must (a) mark the location of civic or visual significance within the area (b) provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape; (c) unlock</p>			

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									<p>significant infrastructure constraints; and/or (d) deliver significant additional publicly accessible open space. Supporting text at paragraph 3.74 states that “tall buildings will be expected to serve as landmarks and unlock significant infrastructure provision (in particular the provision of publicly accessible open space and social and community facilities) to address deficiencies within the area”. Part 6: Appendices of the Plan define tall buildings as “Any building that is significantly taller than their surroundings and/or have a significant impact on the skyline”. SA1.3 is one of only thirteen Site Allocations in Tower Hamlets. It falls within the City Fringe Opportunity Area where tall buildings are accepted. It is a site allocation of strategic importance. The housing evidence base to the Plan allocates SA1.3 for 630 new homes. It is identified for a Strategic Green Grid Project - a new park of 1 ha, waterfront walk, green grid, strategic pedestrian cycle routes, public square (The Oval) and local pedestrian cycling routes. SA1.2 forms part of the Cambridge Heath Local Employment Location (LEL) Allocation which protects all existing viably active employment floorspace and requires new industrial floorspace to be delivered to enhance Tech City. There are both ongoing operational requirements and heritage assets of significance in the site allocation which will also limit developable area. To help achieve some of these policy objectives, it is reasonable to consider that tall buildings will be required. The criteria within Part 3 (a)(c-d) of Policy D.DH6: Tall buildings are representative of the policy objectives in SA1.2 especially in the context of the delivery of publicly accessible open space. We don’t consider criterion (b) necessary as it would prevent clustering. SA1.2 should include specific reference to appropriate tall buildings within the design principles as a necessary requirement to deliver SA1.2 and Plan policies at this strategic Site Allocation. Berkeley Group in its overarching representations has suggested that the Borough wide policy D.DH6(3): should have added ‘Site Allocations’, or ‘Site Allocations in Opportunity and Growth Areas’ as potential locations for Tall Buildings. The site is located within the City Fringe Opportunity area and should therefore be expected to accommodate appropriate tall buildings. We would note that the Council’s Strategic Development Committee (SDC) has recently refused permission for developments proposing Tall Buildings against officer recommendations. This includes the Empress Coachworks site, which is part of this Site Allocation and an application within a Tall Building Zone on the Isle of Dogs. Whilst the Site Allocation and the overarching policy (D.DH6) could be compatible with the delivery of appropriate tall buildings they provide no certainty. For the</p>			

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									<p>deliverability of the site it is important that the policy makes explicit that the Site could provide appropriate tall buildings. Figure 25: Marian Place Gas Works and The Oval should be noted as being 'indicative only'. viii) Summary St. William welcomes the inclusion of the Gasworks site as part of the wider Marian Place Gasworks and Oval allocation. The site can play a very important role in delivering an exemplary high-quality development including new homes and open space as part of the wider Green Grid and contributing to the Regents Canal Conservation area. However, the combined weight of requirements and obligations set out in the draft policy have a disproportionate impact on the Gasworks part of the site limiting its ability to achieve this. In particular, the type and amount of open space implied by the policy and indicative site plan, the extremely broadly drawn heritage restrictions, and requirements for employment uses and family housing risk making the delivery of the site unviable. We would therefore request that the Council considers allowing more flexibility in the site-specific policies and ensures that obligations are fairly allocated across land ownerships. f) Viability Assessment The draft Local Plan is supported by London Borough of Tower Hamlets Local Plan Viability Assessment (September 2017). This includes, in Section 7, indicative viability assessments for the three Gasworks sites (sites 2, 11 and 14). Appendix 13 includes the full assumptions and results for each site. Notwithstanding the concerns highlighted above about abnormal costs, ongoing operational requirements and restrictions on development to deliver the required development, the Council's own evidence concludes that both Leven Road and Bow Common Gasworks are unviable (Table 7.11.1, page 82) as a result of abnormal costs and the combined weight of planning obligations. It finds that Marian Place Gasworks is marginally viable. This assumes considerably higher densities than the other two sites which may not be achievable given the site-specific constraints and policy restrictions described above. St. William is also concerned that the approach to site remediation costs and land value does not meet the requirements to provide 'competitive returns to a willing buyer and willing seller' of paragraph 173 of the NPPF. This is particularly important for sites that are owned by a utility company which needs to be appropriately incentivised to bring its land forward for development and can take a long-term view of that. Without this there is the risk that sites crucial to plan delivery will not be brought forward for development. This emphasises the need for more clarity from the Council on its assumptions and specifically its priorities and approach to flexibilities in the application of policy to provide certainty that the sites are deliverable, as</p>			

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									<p>stated in the Five-Year Land Supply and Housing Trajectory Statement. This is required to ensure that the plan is effective, and therefore sound. g) Summary St. William has an interest in three of the sites identified in the Draft Plan, accounting for 20% of capacity on allocated sites that do not benefit from Planning Permission. It is keen to work positively with the Council, as Berkeley has done on other sites, to bring these sites forward for development and help deliver the new homes, open spaces and infrastructure that the Borough requires as part of high quality sustainable developments. It is concerned that the Regulation 19 Draft Plan introduces additional obligations and restrictions on development which will mean that future delivery of these sites will be more difficult which puts at risk the delivery of the Plan as a whole. We have set out in these representations constructive suggestions for modifications to the Plan that we believe will address these concerns and make it sound. For avoidance of doubt St. William would like to retain the opportunity to respond further, including to questions that the Inspector may have, and to attend hearings on the relevant topic areas. They look forward to working constructively with the Council to address these matters.</p>			

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635451	National Grid Property Holdings		LP194	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 25 :Marian Place Gas Works and The Oval	No	Justified; Effective			Background National Grid Property is supportive of identifying the Marian Place Gas Works and The Oval as a site allocation in the Local Plan as it is a vital site in regeneration terms and can provide a significant contribution to the Borough's housing need. Furthermore, this site allocation has a significant role to play in terms of infrastructure provision and placemaking. However, the allocation is believed to be unsound in terms of the requirements it places on the allocation. As with all the sites owned by National Grid Property there are likely to be significant abnormal costs associated with the redevelopment of the gas work including the costs of remediation and moving energy infrastructure. Viability therefore will be a crucial consideration in the deliverability of this site allocation and its success as a regeneration scheme. It is crucial that this is therefore recognised within the wording of the allocation. Furthermore, paragraph 173 of the National Planning Policy Framework requires "sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". The allocation requires in addition to the provision of housing; maximisation of family homes, the provision of a range of different size employment spaces, other compatible community and social uses, one hectare of strategic open space and the retention, re-use and enhancement of heritage assets. Family Housing The requirement to 'maximise the provision of family homes' seems at odds with other proposed policies in the Plan. Policy D.H2 sets out a table which requires a range of unit sizes. Whilst family housing is an important element of the Site Allocation, it is important that this is considered on a site specific basis and provides a balanced housing mix across the whole site. This will evolve further as detailed design proposals for the site emerge. Open Space Previous versions of the Plan have not categorically stated a quantum of the open space and it is considered, given the competing factors on this site, that the quantum of space should be determined at the planning application stage. The size of the space should not be the focus, it is better to place emphasis on quality so that this can be delivered well to ensure a functional, well utilised space is provided in the future. Placing an unnecessary minimum quantum of open space, risks impacting on the deliverability of the site in the future for much needed housing. With this in mind it is important that Figure 25 is amended to show open space indicatively at this point in time. Employment Space If the Council is to be successful in achieving its overall aim of meeting housing targets during the Plan period, whilst also requiring sufficient open space in this location then the requirement to provide	Yes		Support of the site for allocation is noted. The design principles will be amended as follows: "retain, reuse and enhance the existing heritage assets, including the gasholders and associated structures gasholders no. 2 and no.5 , Victorian buildings adjacent to Regents Canal, and Georgian cottages, including the associated settled pebbled street and railings; Agree to include wording relating to the costs of decontamination. Proposed wording: • Development should acknowledge address the associated costs of decommissioning the gasworks and the temporary relocation of any significant equipment and address any environmental pollution and on site decontamination requirements and land contamination caused by the gas works. As evidenced in the Open Space Strategy (2017-2027) the borough currently has an open space deficiency and based on population growth projections this will continue to grow if the current amount of open space in the borough remains unchanged. In order to mitigate this deficiency and provide closer access to open space , the strategy identifies specific sites to deliver new strategic open space in the borough. Strategic open space is classified as 1ha and above. The strategy identifies the site as being within St Peters ward which has a high deficiency projection in 2031. The site is specifically identified to provide active recreation space for residents limited by strong lines of severance. We consider that this strategy clearly identifies the requirement for a minimum 1ha of open space to meet the borough and local deficiency requirements both currently and as a result of future population projections. Therefore we consider that there is justified evidence supporting the requirement of 1ha of open space on the site in the Local Plan.

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									<p>employment floorspace in this location needs to be fully justified. Any sort of large scale or low density employment use will significantly impact on the viability and deliverability of this site allocation and it is vital that sufficient levels of housing can be provided to support the wider viability and comprehensive redevelopment of the area. See also National Grid comments on Policies S.EMP1, D.EMP2 and D.EMP4. Heritage The proposed retention, re-use and enhancement of the existing heritage assets could have a huge impact on the viability and deliverability of the site allocation as the costs of incorporating these effectively into a regeneration scheme may well be prohibitively expensive. It is unclear from the wording of the policy, what exactly is the expectation of the Council. It states that the development will be expected to, "retain, re-use and enhance the existing heritage assets,including the gasholders and the associated structures...". This uncertainty needs to be clarified or removed from the policy in its entirety. Previous iterations of the plan have not mentioned the retention of the gasholders and additional baseline assessments from the Council do not justify a general requirement for the retention of the holders within the policy and we would contend that this needs to be revisited. Conclusions For this site allocation to meet the tests of soundness for the Local Plan it needs to be deliverable and as set out above, in their current form, the burdensome requirements and obligations presented in this allocation potentially make the allocation undeliverable. It is important that changes to Site Allocation 1.3 include:</p> <ul style="list-style-type: none"> • An acknowledgement that the site is constrained physically and financially due to its historic gasworks use. • Additional flexibility in terms of the requirement to provide family homes (remove the word 'maximise'). • Removal of the minimum requirement for an amount of open space on the site. • Label Figure 25 to state that the plan is 'indicative only' • Removal of reference to the retention of the gasholders and clarify what exactly is meant by 'associated infrastructure.' 			<p>The following wording of the employment land use is proposed:</p> <ul style="list-style-type: none"> • Employment: a range of new floorspace sizes, including suitable units suitable for the needs of small-medium enterprises, start-ups and creative and tech industries <p>The Council are seeking to retain the gasholders. The Council notes the requirement to retain the gasholders and considering this further.</p> <p>A note will be included under each site allocation diagram to state that it is for illustrative purposes.</p> <p>Matters regarding family housing will be discussed further at the examination in public.</p>

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829908	Andrew Wood		LP115	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No	Positively prepared			In the LBTH Whitechapel Vision SPG nine sites are proposed as landmark buildings, but the current Site Allocation currently covers only three of those landmark sites. Why are not the others in the LP? Most of the proposed site allocation covers the proposed Life Sciences buildings which wont be residential. The site with the highest PTAL rating in the Borough, the Sainsbury store in Whitechapel, is not part of a Site Allocation despite developers actively interest in this site, including the submission of planning applications and now an appeal against a planning rejection. It is a very valuable site and should have planning guidance. I am also concerned that there is no tall building zone guidance in Whitechapel with the Royal London Hospital helicopter platform as the high point (86 meter high). There have been a series of planning applications in the area of a decent height that would justify a Tall Building Zone there as well. The graphics in the Whitechapel Vision SPG clearly indicate a desire for tall buildings. I am concerned that the ambitions outlined in the Whitechapel Vision SPG have been watered down or ignored because of a change in politics within the Borough not because of planning issues. With superb transport links, within walking distance to the City of London and other important sites, a major supermarket, the largest hospital building in western Europe, a new civic centre, in an Opportunity area, close to existing schools and GP surgeries Whitechapel should be providing more of the LBTH housing targets.	Yes		<p>The buildings to the north such as the Sainsbury's site do not have a physical and functional relationship to the site allocation and are at different stages within the planning process. The entire area would require a more detailed level of masterplanning which is outlined in the Whitechapel Vision which provides development guidance for the overall delivery of the masterplan area. The SPD still has its status and provides a more detailed view of the aspirations of the site and wider area. It will be a material consideration in determining a planning application. The site allocation provides a broader strategic view of the site. The Whitechapel Arch has a very long leading time due to the complexity of bringing forward development on a large transport interchange. In addition, the nature of the north and south of the site are very different and have different objectives so are not considered appropriate to be included in the site allocation. Consideration was given to have the Sainsbury's site along with Whitechapel Arch as one site allocation, however, they are set away from each other and are also at different stages in the planning process so the prospects of the site being delivered comprehensively are unlikely.</p> <p>This is an employment-led site allocation, however, there are opportunities for residential uses to be delivered within the site allocation. A significant portion of the site is within a LEL so employment uses will be expected to come forward. The Local Plan identified Whitechapel as coming forward for medium growth as shown in figure 10. The areas with more growth are opportunity areas such as the Isle of Dogs.</p> <p>There is a policy regarding tall buildings outside of Tall Building Zones. A detailed evidence base document was produced and Whitechapel was not considered to be appropriate for a Tall Building Zone due to the sensitivity of the location. The policy does not rule out tall buildings in the area subject to meeting the criteria and other relevant policies.</p>

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1054252	Londone wcastle	Londone wcastle	LP632	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No	Positively prepared			The inclusion of the Whitechapel Estate site within the Whitechapel South site allocation (1.4) is supported in principle, because the site represents a strategically important opportunity to deliver housing and commercial floorspace to meet increasing demand in the Borough, as set out within the Whitechapel Vision Masterplan SPD. The Whitechapel Vision Masterplan SPD identifies the development capacity of the area by way of strategic sites, one of which is the Whitechapel Estate (site allocation 15). For consistency, the draft Local Plan should identify the development capacity of the Whitechapel South site allocation. However, the site allocation notes that schemes located within the LEL will be employment led. Our client strongly objects to the inclusion of this statement as it does not align with the aspirations of the Whitechapel Vision Masterplan SPD which identifies the Whitechapel Estate site as being a residential led, high density development. We seek removal of the employment-led reference and recognition that this site is identified for predominantly high density housing in accordance with the SPD. Furthermore, the design principles should align with those set out in the Whitechapel Vision Masterplan. Given the excellent public transport accessibility of the site as a result of its close proximity to Whitechapel Station and the arrival of Crossrail in 2018, high density development should be supported. At present, this objective is not explicit within the drafting and the text should be amended to reflect this. Furthermore, for the reasons outlined above, the draft Local Plan should state that larger scale and tall landmark buildings are appropriate within this site allocation area which respond to the existing townscape of the Royal London Hospital. This is already acknowledged within the Whitechapel Vision Masterplan SPD, but again is not currently clear within the current drafting. As a result, we do not believe the draft plan to be positively prepared. In conclusion, based on the issues identified above, we do not believe that the draft Local Plan is sound. We trust that you will take these comments into consideration during the Council's deliberations, and we request to be kept informed of the ongoing preparation of the Local Plan. If you require any additional information or clarification on the above, please do not hesitate to contact Dean Jordan or Chris Gascoigne of this office.			Comment noted. The capacity for site will be discussed through the pre-application/planning application process. The Whitechapel Vision covers a much wider boundary than the site allocation. It makes reference to opportunities for residential mixed use developments , however the site allocation falls within the Med City area which has a focus on health. It has been noted that the Whitechapel Vision states that there are opportunities for high density neighbourhood living within the Med City, and the wording of the site allocation does not preclude this. The design principles for the site allocation are aligned with the vision. It is not necessary to make reference to tall buildings. There is a policy for tall buildings that are outside of the Tall Building Zone and this along with other policies will be applied in the determination of a planning application that includes tall buildings.

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1033229	Paul Burley	Montagu Evans LLP	LP54	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No	Justified			<p>Representations on Behalf of Barts Health NHS Trust (ID: 635854) Site Allocation and Related Matters Generally we find the map at Figure 19 to be helpful. However, we would find it very useful if the subsequent text for each site allocation was numbered to correspond with Figure 19. In relation to Whitechapel South we question whether the future PTAL rating should be for 2021 rather than 2031 given that the improvement will largely result from the opening of Crossrail Line 1. Generally, we maintain our objections made at the Regulation 18 stage. The draft policy seeks: "Provision of new and improved open space should stretch from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length." We question whether this is what has previously been referred to as the 'Green Spine' and, if so, why previous aspirations for this to connect Whitechapel Road with Commercial Road are no longer being pursued. We have noted in relation to other parts of the draft plan that what was once referred to as the Green Spine appears to no longer connect Whitechapel Road and Commercial Road. If that is the case then we question whether a linear open space is the most appropriate and effective solution. Whilst we consider permeability through and legibility of the Whitechapel South area to be very important, different solutions may result in more effective and usable public spaces, an especially important consideration if such provision is intended to be of more-than-local significance. It may also be the case that effective public areas could take the form of enclosed spaces (a route through the new Civic Centre or a winter-garden, for example). The local plan should be sufficiently flexible to allow such solutions. With regard to the Council's aspiration to see 1 hectare of open space delivered, we question how this figure has been arrived at and how the open space will be fairly distributed across the site allocation, including as part of the new Civic Centre development. Furthermore, we question how landowners will be 'compensated' (in a broad sense) if large parts of the open space – which is intended to be of a wide benefit – falls on their land. Will they be exempted from the requirements of other proposed open space policy and / or will this be treated as a payment in kind for the purposes of CIL? Similarly we question how, where and by whom the energy centre would be delivered, particularly if it is meant to be of benefit to multiple landowners. It would seem to us that this ought to be led by the Council with, where appropriate, the use of CIL / S106 receipts. We consider the following text to be unclear: "Existing consented open space which has yet to be implemented on site is an integral element to the provision of 1 hectare of strategic open space should</p>			<p>A minor modification has been proposed to insert site reference numbers before each table.</p> <p>The public transport accessibility levels have been amended to show the year 2021 due to the arrival of Crossrail: 6b (by 20172021*) 6b (by 2031)</p> <p>Insert footnote at the bottom of the page:</p> <p>*the year 2021 has been used due to the arrival of Crossrail at Whitechapel</p> <p>The linear open space is the Green Spine. While the open space itself does not connect to Commercial Road, it connects to the green grid which provides a green connection to Commercial Road. The Green Spine along with the green grid are considered to be appropriate measures to connect Whitechapel Town Centre to commercial Road.</p> <p>The proposed open space should be open in nature, however, detailed aspects of any proposal will be addressed through the development management process. The delivery of the open space will need to be done so in a co-ordinated way and may require land assembly between various parties. Any contributions will be adjusted accordingly. It is possible for a number of landowners to explore opportunities to deliver a district heating facility. The Council has explored this option as part of the Civic Centre application however it was not deemed feasible.</p> <p>The following design principle has been amended as follows:</p> <ul style="list-style-type: none"> • facilitate the delivery of consolidated interconnected open spaces to form the Green Spine, which will link Whitechapel district town centre to Commercial Road through the following: <ul style="list-style-type: none"> a. Provision of new and improved green open space (the Green Spine) should stretch stretching from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length. b. Buildings adjacent to in alignment with the Green linear open space Spine should

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								be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new green linear open space (known as the green spine) to maximise its multi-functional use." Whilst we object to the proposed provisions, if this is to be retained we suggest that it be re-worded thus: "Within the area subject of this allocation open space has previously been granted planning permission but not delivered. If delivered that area of open space would count towards of the 1 hectare of strategic open space that the Council wishes to see brought forward. However, if built development is brought forward in place of the previously-consented open space, the developer will be expected to provide an equivalent amount of open space that would form part of the new green linear open space (known as the green spine). Such alternative open space would need to be integrated with the proposed green spine so as maximise its multi-functional use." Where it is noted that "Delivery of a health facility should be a NHS-funded primary care and re-provide the existing sexual health facility" this is beyond the control of our client or any owner of land that forms part of the site allocation. The sexual health facility which is currently operated by Barts Health NHS Trust may well be delivered by another party in future and from another site if that is the wish of the local commissioners. Furthermore, it is not a matter for the local planning authority to stipulate who funds NHS facilities. This reference should therefore be deleted from the proposed site allocation.			make a positive contribution to reinforce north-south legibility with permeable routes and visual links through the new development. c. Existing consented open space which has yet to be implemented on site is an integral element to the provision of 1 hectare of strategic open space and should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new gGreen Spine linear open space (known as the green spine) to maximise its multi-functional use. There is an increasing move to private primary care facilities especially in areas of high footfall and good transport connections. The increase in population will lead to more residents requiring NHS funded primary care facilities. A minor modification has been made to the following delivery consideration: Delivery of a health facility should be an NHS funded primary care facility and re-provide the existing sexual health facility.
1142985	Transport for London (TfL)	Transport For London	LP741	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	N/A		<ul style="list-style-type: none"> ▪ The plans for Whitechapel South (part 4) contain no reference to provision for bus standing facilities despite the relatively recent loss of the Durwood Street bus stand adjacent to the Whitechapel station. With the expected increasing popularity of Whitechapel as a destination it seems likely that in the long term there will be increased pressure for bus services to terminate in the vicinity. This should be highlighted within the text. 				It is not considered necessary to retain the bus stand within the site allocation but it should be within the Whitechapel area. This will be discussed at the examination in public.

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1053884		Queen Mary University of London	LP481	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No	Effective			(Redevelopment within Designated Employment Areas) sets out that the redevelopment of LEL's to include non-employment uses will be restricted unless, among other factors outlined in parts a to f, the existing level of employment floorspace is re-provided on site. QMUL consider that it is imperative to ascertain whether this conflicts with the Whitechapel South allocation which allocates housing, in addition to employment led uses, as a land use requirement. QMUL would seek further clarification within Policy D.EMP4 that the land use requirements as set out in the Whitechapel South allocation will not be undermined by the wording of Policy D.EMP4. Overall, QMUL are supportive of both the Whitechapel South allocation and the identification of the site as an LEL, subject to clarification that the policies are not in conflict with one another. SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption. General Development Policies – Clarification required that Whitechapel designated as an LEL does not conflict with the Whitechapel South allocation, particularly with regard to land use restrictions. Additional reference to key worker housing within the sub-text of the specialist housing policy to support the necessary uses that are required to deliver the aspirations for Life Sciences at Whitechapel. The reinstatement of the higher education policy to support the growth of the University over the plan period.			Support for the LEL designation is noted. It is considered the plan already offers sufficient flexibility for uses other than employment to be supported within LELs in line with the requirements of the site allocation.
1053884		Queen Mary University of London	LP669	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No			In addition to this we also note that the plan included within the Local Plan documentation for the Whitechapel South allocation does not relate to the Local Plan Policies Map, this allocation plan currently omits Foyer House. Foyer House is a key component in the long-term delivery aspirations for the Whitechapel Campus and as such QMUL consider that it should be included within the allocation (this is identified on the enclosed plan).	Whitechapel South allocation As stated above and in our previous representations QMUL are strongly supportive of the allocation of Whitechapel South. The University consider that this allocation is an absolute requirement in realising the GLA aspirations for Med City and a Life Sciences presence at Whitechapel. They welcome the acknowledgement of a new medical research cluster associated with QMUL within the overarching trends for the plan period, and the allocation is in line with achieving this aspiration. Similar to our previous representations QMUL would request that the 'Land Use Requirements' detailed in the site allocation be updated to include education and academic uses, which is an integral requirement of QMUL's long term aspirations and growth requirements. At present the proposed land-uses are not fully encompassing of 'Med City' aspirations and what is set out in the Whitechapel Vision Masterplan, which states that academic, research and health service facilities of QMUL, and the Royal London Hospital and other accredited education and research institutions will be primarily clustered in this area. The	Yes		Support of the site allocation noted. Section regarding land use requirements has been amended by making minor modification as thus:• Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical, and research and educational uses associated with the Med City. The land uses in the site allocations are considered to be in line with the Med City and Whitechapel Vision. The requirement of providing units for life science and medical research aligns with the Med City and Whitechapel Vision. It should be noted that the site allocations provide a more strategic policy direction for the site whereas the Whitechapel Vision provides the finer details of the aspirations for the area. Foyer House is currently within the site allocation and is shown on the site allocation map (figure 26) and the Polices Map. Additional

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								<p>Masterplan also sets out the range of complementary uses which will support the campus including new housing, retail, community infrastructure and start-up business accommodation. QMUL acknowledge the amendments to Figure 26 which reflect our previous representations and now makes reference to 'providing suitable units for the needs of life science, medical and research uses.' In addition to this we also note that the plan included within the Local Plan documentation for the Whitechapel South allocation does not relate to the Local Plan Policies Map, this allocation plan currently omits Floyer House. Floyer House is a key component in the long-term delivery aspirations for the Whitechapel Campus and as such QMUL consider that it should be included within the allocation (this is identified on the enclosed plan). Further to our previous representations QMUL would request further clarity on the following elements of the allocation for Whitechapel South: • The infrastructure requirement to re-provide the 'Health Centre'; and, • The current requirement to maximise the number of family homes. We appreciate that housing is a land use requirement within the site allocation, however we would suggest that within the design principles that the wording be amended to allow for the 'inclusion' of family homes as opposed to 'maximising' the provision of family homes. QMUL would suggest that housing tenure should be appropriately determined on a site by site basis.</p> <p>SUMMARY In summary, whilst QMUL support the direction of the travel of the Local Plan, there are a number of amendments that have been outlined that are considered necessary in order for it to be sound. These are summarised below, and we request that these are incorporated into the plan prior to adoption.</p> <p>Whitechapel Campus – QMUL continues to support the 'Whitechapel South' site allocation subject to further clarifications as set out in these representations. We would also request that the allocation plan is updated to reflect the site allocation as detailed in the Policies Map. As detailed above, QMUL would welcome further engagement with LBTH regarding these comments and their aspirations for both Whitechapel and Mile End to ensure that their aspirations for the plan period can be realised alongside other use requirements.</p>			<p>information regarding housing will be provided at the examination in public. Local Plan policies seek to protect health facilities. The sexual health centre is expected to be re-provided. LBTH welcomes further engagement.</p>

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635854	Barts Health NHS Trust		LP245	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 26 :Whitechapel South	No				Site Allocation and Related Matters Generally we find the map at Figure 19 to be helpful. However, we would find it very useful if the subsequent text for each site allocation was numbered to correspond with Figure 19. In relation to Whitechapel South we question whether the future PTAL rating should be for 2021 rather than 2031 given that the improvement will largely result from the opening of Crossrail Line 1. Generally, we maintain our objections made at the Regulation 18 stage. The draft policy seeks: "Provision of new and improved open space should stretch from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link across its length." We question whether this is what has previously been referred to as the 'Green Spine' and, if so, why previous aspirations for this to connect Whitechapel Road with Commercial Road are no longer being pursued. We have noted in relation to other parts of the draft plan that what was once referred to as the Green Spine appears to no longer connect Whitechapel Road and Commercial Road. If that is the case then we question whether a linear open space is the most appropriate and effective solution. Whilst we consider permeability through and legibility of the Whitechapel South area to be very important, different solutions may result in more effective and usable public spaces, an especially important consideration if such provision is intended to be of more-than-local significance. It may also be the case that effective public areas could take the form of enclosed spaces (a route through the new Civic Centre or a winter-garden, for example). The local plan should be sufficiently flexible to allow such solutions. With regard to the Council's aspiration to see 1 hectare of open space delivered, we question how this figure has been arrived at and how the open space will be fairly distributed across the site allocation, including as part of the new Civic Centre development. Furthermore, we question how landowners will be 'compensated' (in a broad sense) if large parts of the open space – which is intended to be of a wide benefit – falls on their land. Will they be exempted from the requirements of other proposed open space policy and / or will this be treated as a payment in kind for the purposes of CIL? Similarly we question how, where and by whom the energy centre would be delivered, particularly if it is meant to be of benefit to multiple landowners. It would seem to us that this ought to be led by the Council with, where appropriate, the use of CIL / S106 receipts. We consider the following text to be unclear: "Existing consented open space which has yet to be implemented on site is an integral element to the provision of 1 hectare of strategic open space should be re-provided. Where opportunities exist,	Yes		Support of the site allocation noted. Section regarding land use requirements has been amended by making minor modification as thus: <ul style="list-style-type: none"> • Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical, and research and educational uses associated with the Med City. <p>The land uses in the site allocations are considered to be in line with the Med City and Whitechapel Vision. The requirement of providing units for life science and medical research aligns with the Med City and Whitechapel Vision. It should be noted that the site allocations provide a more strategic policy direction for the site whereas the Whitechapel Vision provides the finer details of the aspirations for the area. Foyer House is currently within the site allocation and is shown on the site allocation map (figure 26) and the Polices Map.</p> <p>Additional information regarding housing will be provided at the examination in public.</p> <p>Local Plan policies seek to protect health facilities. The sexual health centre is expected to be re-provided. LBTH welcomes further engagement.</p>

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								<p>development will be expected to consolidate and integrate the consented open space with the new green linear open space (known as the green spine) to maximise its multi-functional use." Whilst we object to the proposed provisions, if this is to be retained we suggest that it be re-worded thus: "Within the area subject of this allocation open space has previously been granted planning permission but not delivered. If delivered that area of open space would count towards of the 1 hectare of strategic open space that the Council wishes to see brought forward. However, if built development is brought forward in place of the previously-consented open space, the developer will be expected to provide an equivalent amount of open space that would form part of the new green linear open space (known as the green spine). Such alternative open space would need to be integrated with the proposed green spine so as maximise its multi-functional use." Where it is noted that "Delivery of a health facility should be a NHS-funded primary care and re-provide the existing sexual health facility" this is beyond the control of our client or any owner of land that forms part of the site allocation. The sexual health facility which is currently operated by Barts Health NHS Trust may well be delivered by another party in future and from another site if that is the wish of the local commissioners. Furthermore, it is not a matter for the local planning authority to stipulate who funds NHS facilities. This reference should therefore be deleted from the proposed site allocation.</p>			

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1142677	Crest Nicholson		LP585	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 3: Sub-area 2: Central	N/A			Chapter 3: Sub-area 2 'Central' outlines the vision for the area up to 2031. This identifies the enhancement and strengthening of the district character and identity of the Central sub-area as key objectives. In addition, there is an emphasis on growth around vibrant and revitalised town centres and neighbourhood parades, including at Roman Road. As a means of achieving these objectives, paragraph 3.3 encourages "the regeneration of key historic buildings to preserve the areas diverse heritage assets and character", and also the need to "deliver a range of housing choice from student accommodation, family housing, infill development and intensification where it contributes to delivering mixed and balanced communities". In addition, paragraph 3.4 of the 'Central' chapter states that the development within the Central sub-area will be required to accommodate a number of different uses to meet the future needs of the borough. This includes a need for a minimum of 7,624 new homes (comprising 6,671 units as in Figure 1 plus a windfall allowance). The draft Local Plan, however, allocates only for 1,146 units through two allocations within the Central sub area. These are located at: Bow Common Gas Works Chrisp Street Town Centre There is therefore an immediate need to allocate further sites within the Central sub area to overcome a deficit of 6,478 units. The Site presents an excellent opportunity to help boost the supply of housing within the Central area.				Proposal not supported. The Site Allocations Methodology (2017) sets out the requirements for a site to be allocated. The capacity of the London Chest Hospital Site does not meet the housing delivery threshold of delivering a minimum of 500 homes (this threshold is taken from policy 3.7 of the London Plan) The sensitivity of the site being within a statutory listed building and also the character of the surrounding area, which includes a conservation area, this limits the amount of development on site to meet the threshold. Whilst the recent applications have proposed some form of D1 use, it is not considered that any other form of significant infrastructure could be provided to warrant it being a site allocation.
1142050	Paul Vlitos		LP28	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 27 :Character places in Central	No	Positively prepared			This pop-up map shows a different route for the proposed cycle superhighway to the route shown on the hard documents held in Bethnal Green Library. One shows the highway going down Lichfield Road and around Tredegar Square Gardens, the other shows it going down Morgan St and across (!) Tredegar Square Gardens (a public space much used by the community, where children play). How are the public supposed to comment on the plans when the documentation does not even make the proposed route clear? This is a serious failure of document preparation and grossly slapdash. I have uploaded the hard copy, showing that	No	This pop-up map shows a different route for the proposed cycle superhighway to the route shown on the hard documents held in Bethnal Green Library. One shows the highway going down Lichfield	The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map. The following planning designations are currently associated with Tredegar Square Gardens: <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square

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								it shows an entirely different proposed route for the highway. Further consultation or clarification is surely necessary, given that multiple, contradictory versions of the proposed route are being put forward in your own documentation.		<p>Road and around Tredegar Square Gardens, the other shows it going down Morgan St and across (!) Tredegar Square Gardens (a public space much used by the community, where children play). How are the public supposed to comment on the plans when the documentation does not even make the proposed route clear? This is a serious failure of document preparation and grossly slapdash. I have uploaded the hard copy, showing that it shows an entirely different proposed route for the highway. Further consultation or clarification is surely necessary, given that multiple, contradictory versions of the proposed route are being put forward in your own documentation.</p> <p>The documentation needs to be consistent - otherwise the consultation is a pointless and invalid exercise.</p>	<ul style="list-style-type: none"> • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142067	Mary Friel		LP36	PART 4: DELIVERING SUSTAINABLE PLACES, 3.3 Paragraph	No	Effective			There are 2 cycle route maps circulating, one showing the cycle route going through the middle of Tredegar Square gardens. Clearly this would be very dangerous for the children who play in the gardens. There is no detail on cycle route signage. Intrusive road markings would be incompatible with the conservation area and the Grade 2 listed buildings surrounding the square.			<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map. The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens. <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter. As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets. We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>
1142054	Alexander Chartres		LP34	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	Yes				<p>The plan for a cycle superhighway to be driven through the centre of an historic preservation area and a park used by children, families and dog walkers is profoundly short-sighted. Consultation has been totally inadequate and the residents feel completely in the dark.</p> <p>Response to Figure 28: Vision for Central Serious objection to route of new proposed cycle-superhighway I am writing to object in the strongest possible terms to the proposed route for the new cycle-superhighway slated to run north-south through Tredegar Square Gardens, which I understand are a legally protected King George playing field. I am fully behind efforts to encourage more people to travel by foot and bicycle,</p>	Yes		<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar

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								<p>but the plans as they stand are deeply short-sighted and should be reconsidered. I have detailed my objections below:</p> <ul style="list-style-type: none"> - The square's gardens are a communal asset used extensively by the local community for events such as fetes or Christmas carols and are vital in providing a local community hub. Bisecting the gardens with a cycle superhighway will radically alter the nature of the space and damage an irreplaceable community asset. - On a daily basis, the square's gardens are enjoyed by children and families, dog walkers and the wider community far beyond just those resident in the square. This is possible because the square's gardens are peaceful and safe and not subject to constant, fast-moving traffic in the shape of cyclists. Running a cycle superhighway through it is guaranteed to endanger public safety, and destroy a safe area for play and recreation. - The gardens are a King George playing field and are legally protected to ensure that they remain freely open to the public for play and it is in this spirit that the gardens are currently used. I see no evidence at all that Fields in Trust have been consulted, let alone given their consent to these plans. - Separately, the square forms part of an important historic preservation area. How will additional signage and major reworking of the roads and garden layout enhance this? The Council has signally failed to provide any detailed explanation of this or on the design and signing for the superhighway within the square and its gardens. - The 'consultation' for these radical plans has been woefully inadequate to the point of negligent. I was only made aware of them by a (belated) leaflet from the local residents' association this morning. How can the Council believe that such a disruptive plan can even be considered without writing directly to all the affected households, accompanied by a community information programme to ensure stakeholders understand what is being proposed? <p>At a time of public service reductions, it seems curious that LBTH can find the money to run an unnecessary highway through the quiet streets of an historic preservation area, to the evident detriment of the local community. I will be writing to the local mayor and the relevant councillors immediately to register my objection.</p>			<p>Square Gardens</p> <ul style="list-style-type: none"> • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142024	Ann Lavelle		LP25	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Effective		Putting a cycle superhighway through Tredegar Square will completely alter the use of the square which is currently a quiet place for young children to play, people to sit and dog walkers to enjoy a chat. It is usually a peaceful and lovely place although occasionally disturbed by groups of youths in the Summer who can get rowdy and intimidating. Cycles could easily be routed around the square - particularly on the East side where there is little through traffic so this would be a safe option for cyclists whilst keeping the square free for peaceful local use.	No	<p>The Square is a protected space as it is a King George playing field.</p> <p>Route the cycle path around the square.</p>	<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142053	Catherine Macdonald		LP31	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Positively prepared		All plans showing the cycle path through Tredegar Square need to be consistent with one another. There needs to be an opportunity to comment on the proposal to route cycles through the current enclosed pedestrian area of the square itself.	No	<p>It is not legally compliant because the conflicting maps are misleading, and there has been no opportunity to make comments on the route through the enclosed pedestrian area of the square.</p> <p>All maps should be consistent with one another. There should be an opportunity to comment on the very significant change that involves routing the cycle route through the centre of the square, which is a popular pedestrian area used extensively for quiet recreation, and which is currently closed each day after dark.</p>	<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1052940	David Berridge	MEOTRA	LP10	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Justified			<p>PROPOSED STRATEGIC PEDESTRIAN/CYCLE SUPERHIGHWAY MEOTRA is the Mile End Old Town Residents Association and covers the area from Harley Grove in the East to Clinton Road in the West, and from Mile End Road in the South to Lichfield Road in the North. There are approximately 900 households in the area. MEOTRA objected to the proposed route. The question "what would the Superhighway look like interns of changes to roads and signage' was asked at a meeting, but was not answered. MEOTRA considers there are no barriers at present to pedestrian movement and cycles. Any changes to the roads and/or signage would detract from the architectural character of the Tredegar Square Conservation Area. The exact route has two versions, one in the map connected to the comments here, and another on the Policies Map which is linked to the New Local Plan page of the Tower Hamlets web site. The route on the Policies map is at variance to the previously shown route, in that it goes through the Tredegar Square Gardens rather than along the perimeter road, and runs along the pedestrian pavements rather than along the road. MEOTRA maintains it's object to the Superhighway in that it is likely to be detrimental to the the architectural character of the Tredegar Square Conservation Area. MEOTRA objects to the change to the route being directed though the Tredegar Square Gardens, firstly as the gardens are effectively a toddlers' play area, and secondly that the gardens are locked at night. Thus the plan has not been consulted constructively or effectively, and the proposal is not feasible. MEOTRA objects to the change of position of thereto from along roads to along footpaths. The is unsuitable for a Cycle Superhighway to run along pavements, which in many case are directly in front of people's front gates. Thus being dangerous. This part of the plan has not been consulted constructively or effectively, and by virtue of the likely danger is not feasible.</p>			<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map. The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens. <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets. We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1141924	Jakki Moxham		LP18	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Positively prepared		My comment relates to the running of a cycle superhighway through the middle of Tredegar Square gardens. It will be impossible to run a cycle superhighway through the garden without fundamentally destroying the garden - it is enclosed, locked at night and provides a safe environment for family and young children. This piece of enclosed open space is a King George Playing Field and as such is protected in perpetuity for the benefit of children and young people. I do not believe that you have consulted with the Fields in Trust charity regarding the destruction of the garden. Furthermore destroying this piece of safe open space goes against the express objectives of protecting and indeed increasing open space in the borough as set out in the plan.	Yes		<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1056933	Jane Collier		LP117	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Effective			It is unclear from the website where I am supposed to comment on the proposal for a cycle superhighway through Tredegar Square Gardens. If this is not the appropriate place, please take these comments into account in any event when considering that cycle superhighway proposal. The document needs to address the following issues in relation to the cycle superhighway scheme through Tredegar Square Gardens. 1. A cycle superhighway through Tredegar Square Gardens will harm the recreational and visual amenity of the gardens and make them less safe for children to play in. The gardens are not big enough to accommodate safe recreational use and a cycle superhighway. The highway going through the gardens will also harm the aesthetic value of the square and gardens. 2. A cycle superhighway through Tredegar Square Gardens may involve cutting down mature trees and greenery in the gardens. 3. A cycle superhighway through Tredegar Square Gardens may involve removing railings and gates including stonework of historic interest. 4. Tredegar Square Gardens are currently locked at night. They are surrounded by around 60 houses. If the cycle superhighway is to remain open at night the proposal needs to address how the Council will prevent antisocial behaviour and noise disturbance in Tredegar Square Gardens during the night. 5. The proposal will also lead to an increase in noise in the gardens, which as above are surrounded by around 60 houses, during the day including in the early morning rush hour. 6. The proposal is for the cycle superhighway to go up Coborn Road under the railway bridge into Tredegar Road. That part of Coborn Road going under the railway bridge is far too narrow to accommodate a cycle lane and there is already too much traffic at that junction at rush hour. 7. If pavements have to be removed to accommodate a cycle lane anywhere along the route, there will be an impact on pedestrian safety. 8. I do not recall the previous proposal showing the route going through the gardens (as opposed to alongside them) - in any event, if it did, I was not aware of this.			<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142158	John Rentoul		LP116	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central					<p>I wish to record my objections to the route of the cycle path through Tredegar Square, as shown in the "Local Plan 2031 Regulation 19 Policies Map".</p> <ol style="list-style-type: none"> 1. The route would in my opinion damage the visual amenity of Tredegar Square Gardens. 2. It would make the Square less safe for young children. 3. If the Square were left open at night it would be likely to encourage anti-social behaviour. <p>In addition, I would like to point out how difficult it has been to comment on this document. Apart from the complicated registration requirements, it is hard to find the relevant section and there is no obvious place to enter comments, hence this additional document.</p>			<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142051	Olivier Rousseau		LP29	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Positively prepared		I have seen 2 versions, with One having the cycle path in the middle of Tredegar Square. The Square is used by kids to play which is not compatible with having a cycle path in the middle!	Yes		<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map. The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens. <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets. We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1142050	Paul Vlitos		LP30	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 28 :Vision for Central	No	Justified			The current proposed route available to consult in hard copy at the borough's libraries - that is to say the route which runs directly through the middle of the historic Tredegar Square Gardens and down Morgan Street, not the route outlined in the very misleading map in Fig. 28 here - cannot possibly be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base. It cuts directly through a public square, much used by local families with small children through the year - from Christmas carols to summer picnics. What Tower Hamlets council is effectively proposing here is to turn an historic, safe open space into a busy and dangerous thoroughfare, contravening your own objectives to 'facilitate community cohesion' and to 'preserve the areas [sic] diverse heritage assets and character'. It is also unclear how it is proposed that this be managed at night - 24/7 access will exacerbate issues with antisocial behaviour around the square. There is also a very large primary school (Malmesbury) at the crossroads of Morgan Street and Coburn Road where drop off time would co-incide with morning rush hour. Having seen the speed and number of cyclists on Mile End Road, the proposed route is a clear danger to hundreds of children on a daily basis - the council must be aware that this is already a dangerous route, as there is a lollipop lady on duty every day at exactly that point.	No	It does not contain an accurate representation of the proposal for a cycle superhighway. It would need to have the current conformation and for a proper discussion to take place around this new proposal.	The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map. The following planning designations are currently associated with Tredegar Square Gardens: <ul style="list-style-type: none">• London Squares: Tredegar Square Gardens• Conservation Area: Tredegar Square• Sub Areas: Central Area• Neighbourhood Planning Area: Roman Road Bow• Publicly Accessible Open Space: Tredegar Square Gardens• Green Grid The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens. We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter. As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets. We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.

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1052940	David Berridge	MEOTRA	LP11	PART 4: DELIVERING SUSTAINABLE PLACES, 3.4 Paragraph	No	Effective			MEOTRA is the Mile End Old Town Residents Association and covers the area from Harley Grove in the East to Clinton Road in the West, and from Mile End Road in the South to Lichfield Road in the North. There are approximately 900 households in the area. With reference to the proposed Strategic Pedestrian/Cycling Link Improvement shown on the map 5.5 Sub-Area 2 Central, and the stated aims at Item 6 Transport and Connections. MEOTRA objects to the Strategic Pedestrian/Cycling Link. The plan has not been positively prepared; The previous route and position have been changed. The previous route was shown differently in different parts of the documentation. The plan has not been properly justified; The evidence base document does not show this route. The plan is not effective The possible physical disruption to the roads/pavement and the effect on the Conservation area have not been addressed. That the Gardens are locked overnight for safety reasons has not been addressed.			<p>The new Local Plan does not propose any cycle superhighway through the square and no such designation is displayed on the Policies Map.</p> <p>The following planning designations are currently associated with Tredegar Square Gardens:</p> <ul style="list-style-type: none"> • London Squares: Tredegar Square Gardens • Conservation Area: Tredegar Square • Sub Areas: Central Area • Neighbourhood Planning Area: Roman Road Bow • Publicly Accessible Open Space: Tredegar Square Gardens • Green Grid <p>The nearest cycle superhighway runs along the Mile End Road south of Tredegar Square Gardens.</p> <p>We assume that the confusion has arisen from the fact that the Policies Map uses similar (green) colour to illustrate the green grid and the cycle superhighway designations, although the cycle superhighway green is clearly lighter.</p> <p>As per the Green Grid Strategy Update (2017), the green grid provides a framework for the delivery of walking routes and associated green infrastructure in the borough and Tredegar Square Gardens forms an important part of this network. Green grid is defined as an integrated network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within Tower Hamlets.</p> <p>We propose to amend the diagram to ensure that more distinctive colours are used to illustrate the two designations in the final version of the Local Plan and the associated Policies Map.</p>

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1053309	Jane Wilkin	Environment Agency	LP250	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 30 :Bow Common Gas Works	No				NOTE THAT THE EA DID NOT SAY THAT THE PLAN IS UNSOUND BUT NOTE THE COMMENTS BELOW: We raised in our previous comments that these sites have been subject to historic uses which have the potential to have resulted in land contamination, however this has not been included within the delivery considerations for the allocations. Land remediation is a significant consideration in the delivery of a development as in some cases it can take a long time to undertake assessments and remediation to enable commencement of the development. Assessments are required for these sites as part of the planning application to understand the potential contamination on site. The delivery considerations should be expanded for these sites to highlight the previous historic uses of the site which may have resulted in land contamination. Suggested wording: Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.	Yes		Agreed. The proposed wording will be included in the delivery considerations: An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
1142339	Sharon Jenkins	Natural England	LP210	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 30 :Bow Common Gas Works	Yes			Thank you for your consultation on the above dated 2nd October 2017. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Local sites Two of the proposed site allocations are adjacent to Local Nature Reserves (LNRs). Namely, site 2.1 – Bow Common Gas Works - which is adjacent to Tower Hamlets Cemetery Park LNR and site 4.3 – Crossharbour Town Centre - which is adjacent to Mudchute Park Farm LNR. Both of these designated sites contain deciduous woodland, which is a priority habitat (as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006) and may be sensitive to construction related impacts in the surrounding area. The authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines planning applications on sites 2.1 and 4.3, as per paragraph 5 of Policy D.OWS3 within the Local Plan. Natural England does not consider the Plan unsound with regard to impacts on biodiversity.				Agreed. The following wording is proposed: • respond positively to the existing - setting of the two conservation areas: Tower Hamlets Cemetery and Swanton Roadscale and of the local nature reserve, including as well as the scale, height, massing and fine urban grain-of the surrounding built environment. Matters relating to information being provided to ascertain the impact of development on the site will be dealt with through the development management process. Matters relating to enhancement to biodiversity are addressed in the open space policies and will be implemented through the development management process.

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								Nevertheless, we would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework), and we trust that Tower Hamlets Borough Council will make provisions towards enhancing the biodiversity value of Local Nature Reserves over the course of the plan period.' For any further consultations on your plan or any new consultations please contact: consultations@naturalengland.org.uk				
1142559	Tim Brennan	Historic England	LP453	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 30 :Bow Common Gas Works	N/A			You may be aware that Historic England has very recently received an application to list the gas works building on Bow Common Lane. This is currently under consideration. We would also suggest that the first bullet point of the design principles be amended to include at the end '....surrounding built environment including the two adjacent conservation areas'.				Comment noted.

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1142327		St. William	LP218	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 30 :Bow Common Gas Works	No	Effective; Consistent with national policy			<p>a) Introduction and Scope We are writing on behalf of St. William in response to the consultation on your draft Local Plan. St. William, the joint venture between National Grid and the Berkeley Group, has an interest in three of the site allocations in the Draft Local Plan: • Marian Place Gas Works and the Oval • Leven Road Gas Works • Bow Common Gasworks These representations relate to the site-specific allocations for those sites. The Berkeley Group of which St. William is part, has submitted representations on the Strategic and Development Management policies in the revised Draft Plan. These cover four critical policy areas in the Plan which are of concern: • Developer contributions and planning obligations • Design • Housing • Schools, Open Space, and Other Community Facilities All of these issues also cross-relate to the site-specific allocations, which illustrate some of the group's key concerns, and therefore the two sets of representations should be read alongside one another. b) Overview The table below shows the sites in which St. William has an interest. Leven Road and Bow Common Gasworks are in single ownership whilst the Gasworks part of the Marian Place/Oval site comprises approximately half of the site allocation. St. William welcomes their allocation in the Draft Plan. Site Area Status Capacity Leven Road Lower Lea Valley Opportunity Area & Poplar Housing Zone 1,485* Bow Common Poplar Housing Zone 468* Marian Place/Oval City Fringe Opportunity Area 630* Total 2,583 * Indicative homes identified in LBTH Viability Study (2017) As current or former Gasworks sites they all have very significant remediation costs and also ongoing requirements to provide gas infrastructure including accessible underground gas pipelines and operational pressure reduction stations (PRS), which place ongoing development restrictions to accommodate the required easements and safety zones on parts of the sites. This reduces the developable area assumed by the Council. The retention of any Gasholders also has very significant cost implications. Even if not re-purposed for an active use their retention requires them to be dismantled, transported significant distances for refurbishment, reinforced when returned to the site during reassembly, and maintained and insured by future residents. For the two sites in the Draft Plan where the policy currently requires retention of some of the Gasholders this does not appear to have been taken into account in the viability assessments. St. William is currently in pre-application discussions with the London Borough of Tower Hamlets on the Leven Road site. The other two sites are still at pre-planning stage. The Draft Local Plan does not identify housing targets for the individual site allocations other than to note that they are sites with capacity for over 500 homes</p>			<p>The council has allowed for significant remediation costs for all three of the site allocations which are on gas works sites.</p> <p>In terms of the ongoing requirements to provide gas infrastructure on site, the council are considering these matters.</p> <p>The housing targets in the plan are minimum targets. The density of the development will be determined through the development management process.</p> <p>The obligations have been noted and the approach to these requirements is set out in the Site Allocations Methodology and the Spatial Assessment Need for Schools.</p> <p>The Viability Assessment (2017) shows that the site is viable alongside the provision of a lower level of affordable housing.</p> <p>The Viability Assessment (2017) does not need to account for the cost of open space or enhanced public realm – to the extent that these elements of the site are infrastructure then they will be funded using the Community Infrastructure Levy which has been accounted for in full.</p> <p>With regards to viability assessment accounting for employment uses, any such uses would be de minimise relative to the residential uses on site. Accounting for these employment uses will have minimal impact on the viability of the scheme but if anything would make the site marginally more viable.</p> <p>With regards to the costs of remediation, significant remediation cost allowances have been included in the study. The approach to land value is the most appropriate for testing Local Plans and the approach is very much in line with the Viability Testing Local Plans: Advice for Planning Practitioners document produced by the Local Housing Delivery Group Harman guidance on testing Local Plans. This guidance recommends that BLVs are “based on a premium over current use values” with the “precise figure that should be used as an appropriate premium above current use value [being] determined</p>

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								<p>(para 2.11). However, the Viability Study (2017) includes indicative numbers of homes in the site-specific assessments and these are shown in the table above. As far as we are aware none of the published evidence base identifies the contribution these sites are expected to contribute to the housing trajectory contained in Appendix 7 of the Draft Plan. However, both Bow Common Gasworks and Leven Road Gasworks are identified in Appendix B of the Five-Year Housing Land Supply and Housing Trajectory Statement as sites which have been assessed as being able to provide deliverable supply within the plan period. The evidence base document, London Borough of Tower Hamlets Housing Delivery Strategy (September 2017) sets out in Section 8 how the Council intends to address its shortfall in supply. It specifically identifies (in paragraphs 8.18 to 8.20) the Poplar Housing Zone as a location where interventions are likely to mean that delivery will be greater than currently assumed. It also suggests that the GLA may produce an updated Lower Lea Valley Opportunity Area Planning Framework (OAPF) focused on Poplar Riverside to maximise the opportunity and the delivery of family housing. Paragraphs 8.4 and 8.5 of the strategy note that average densities are used for site allocations without planning permission and where no further capacity details are available but that it is likely that: "these sites may deliver more homes than has been currently assumed". If we use the assumptions in the Viability Study, which are based on assumed density ratios, they equate to just under 5% of the total known projected housing supply in the Borough (Draft Local Plan, Appendix 7), and 20% of capacity on site allocations without permission. They are therefore critical to the delivery of the Local Plan targets, particularly as the Council is relying on over 8,330 homes being delivered as windfalls or unidentified sites. It is therefore critical that the indicative numbers above are seen as a minimum and the capacity of allocated sites is maximised. Our overriding concern is that the Council's own evidence for these sites when it produced its Managing Development DPD demonstrated that the weight of obligations placed on the sites at that time meant that they weren't viable. The new Draft Plan adds further requirements and restrictions on the sites, which reduce developable site area, limit development capacity and add further obligations. The Council has also introduced its Community Infrastructure Levy charging schedule, and has stated that it will be updating this alongside the Local Plan. St. William is very keen to continue to work positively with the Council to ensure that the capacity of the sites to deliver housing, including affordable housing, and wider placemaking requirements, including social</p>			<p>locally". The guidance considers that this approach "is in line with reference in the NPPF to take account of a "competitive return" to a willing land owner". The use of a 20% premium is consistent with testing associated with numerous other Local Plans and CIL Charging Schedules.</p> <p>It has been noted that more secondary schools have been allocated than are required and the rationale is outlined in the Site Allocations Methodology. Free schools have not been taken into account due to the uncertainty of their deliverability.</p> <p>It is not considered necessary to include reference to tall buildings as policy D.DH6 addresses tall buildings outside of tall building zones. It should be noted that the supporting text of policy D.DH6 has been amended to include reference to site allocations as follows:</p> <p>Paragraph 3.75:</p> <p>Where possible, we will seek to work with developers, landowners, statutory agencies and neighbourhoods to develop masterplans to guide the scale and location of tall buildings, taking account of their wider and cumulative impacts, in line with the requirements set out above. This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant policies.</p> <p>In relation to the comment regarding active frontages along the railway arches, this does not necessarily mean a commercial use. Without encouraging activities in that area/location, that area of the site could be prone to anti-social behaviour. Active frontages should encourage footfall which increases safety and may encourage activation of spaces within the railway arches.</p> <p>As evidenced in the boroughs Parks and Open Space Strategy 2017-2027 Tower Hamlets needs more playing pitches to meet existing local demand. Population growth is forecast to further increase this demand. In addition to this the borough currently has an open space deficiency</p>

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								<p>infrastructure and open space can be achieved whilst ensuring that the sites are viable and deliverable. At present St. William is of the view that the Plan is unsound in relation to these three site allocations, because it is not effective (i.e. deliverable) and because it is inconsistent with the National Planning Policy Framework (NPPF), paragraph 173 which states: Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.” We set out below some constructive suggestions in relation to each site which we believe can help make the Plan sound. e) Bow Common Gasworks i) Site Allocation 2.1 Bow Common Gasworks is the smallest of the three Gas Works sites (3.94 hectares). It forms part of the Poplar Housing Zone, designated by the GLA and has been identified by the Council as a deliverable part of its housing supply. The Draft Plan policy requires a strategic open space (1 ha) and a secondary school, which as we have noted above is assumed in the Council’s Viability Assessment to be 1.5 ha. Given the restrictions of ongoing and future operational gas infrastructure requirements on the site it is unlikely that this quantum of uses can be physically accommodated alongside enough homes to meet the 500 home threshold and certainly not in the configuration shown in Figure 30. Leaving aside the physical capacity of the site, the Council’s own viability evidence demonstrates that these obligations leave the site unviable. Berkeley Group has noted in its representations to the Draft plan that the Council has allocated five sites to meet the notional need for four secondary schools, although if free schools and academies come forward this could be fewer. The site is also directly opposite an existing secondary school and is not located in a part of the borough where the Council has identified significant additional school demand. In practice the only way this site will be able to come forward viably is if the secondary school and/or the strategic open space allocations are reduced or removed. ii) Design The site allocation refers to the need to “respond positively to the existing scale, height, massing and fine urban grain of</p>			<p>which constrains the scope of the council to grow the playing pitch offer without displacing other park users in the borough.</p> <p>In order to mitigate this deficiency Bow Common Gas Works along with other key development sites in the borough has been identified to deliver a minimum of 1ha of consolidated strategic open space which is designated to provide multi-functional leisure and recreation uses.</p> <p>Due to the requirement to mitigate deficiency in the borough and the sites potential to accommodate pitches we do not consider that the reference to ‘multi-functional leisure and recreation uses’ be removed. The finer detail of how the open space will function will be addressed through the development management process.</p> <p>While the site is not a designated employment area, S.EMP1 makes clear that cumulatively non-designated sites can provide a significant quantum of floorspace. It would not be expected that the site would provide significant levels of employment floorspace, nonetheless there is an opportunity to provide some employment floorspace and as such the text within the land use requirements for the site are considered appropriate.</p>

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									<p>the surrounding built environment". Given the other constraints on the site and the need to deliver over 500 homes it is inevitable that high density development, including tall buildings would be required on the site. The policy should state this explicitly. The draft policy suggests a need to provide "active frontages along the railway to enhance the use and setting of the railway arches as a non-designated heritage asset. The railway arches provide the boundary between the site and Tower Hamlets Cemetery. It is not obvious that such uses would be appropriate or viable location for such uses which has been acknowledged in previous discussions with the Council. We would suggest the requirement for active frontages be removed. iii) Family Housing & Open Space The policy suggests that family housing should be provided overlooking the open space and that it should provide 'multi-functional leisure and recreation uses. It is not clear what the latter means but if sports pitches and floodlighting were required it would impact both on the amenity of housing and the usability of open space for other users. The site is located about half a mile from Mile End park which includes a range of active leisure uses including a stadium, leisure centre and all-weather sports pitches. We would therefore suggest that reference to multi-functional leisure and recreation uses is removed. As with the other sites the Viability Assessment does not appear to include costs for the Open Space other than removing the area from the site development capacity and a general external areas allowance. Figure 30: Bow Common Gas Works should be revised to reflect our comments above on appropriate uses and deliverability and noted as being 'indicative only'. iv) Employment Uses The site currently has no employment uses taking place on it. There should therefore be no requirement to 'replace employment numbers'. Provision of SME spaces, creative uses and retail should be optional. These uses do not appear to have been considered in the Council's Viability Assessment. f) Viability Assessment The draft Local Plan is supported by London Borough of Tower Hamlets Local Plan Viability Assessment (September 2017). This includes, in Section 7, indicative viability assessments for the three Gasworks sites (sites 2, 11 and 14). Appendix 13 includes the full assumptions and results for each site. Notwithstanding the concerns highlighted above about abnormal costs, ongoing operational requirements and restrictions on development to deliver the required development, the Council's own evidence concludes that both Leven Road and Bow Common Gasworks are unviable (Table 7.11.1, page 82) as a result of abnormal costs and the combined weight of planning obligations. It finds that Marian Place Gasworks is marginally viable. This</p>			

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									<p>assumes considerably higher densities than the other two sites which may not be achievable given the site-specific constraints and policy restrictions described above. St. William is also concerned that the approach to site remediation costs and land value does not meet the requirements to provide 'competitive returns to a willing buyer and willing seller' of paragraph 173 of the NPPF. This is particularly important for sites that are owned by a utility company which needs to be appropriately incentivised to bring its land forward for development and can take a long-term view of that. Without this there is the risk that sites crucial to plan delivery will not be brought forward for development. This emphasises the need for more clarity from the Council on its assumptions and specifically its priorities and approach to flexibilities in the application of policy to provide certainty that the sites are deliverable, as stated in the Five-Year Land Supply and Housing Trajectory Statement. This is required to ensure that the plan is effective, and therefore sound. g) Summary St. William has an interest in three of the sites identified in the Draft Plan, accounting for 20% of capacity on allocated sites that do not benefit from Planning Permission. It is keen to work positively with the Council, as Berkeley has done on other sites, to bring these sites forward for development and help deliver the new homes, open spaces and infrastructure that the Borough requires as part of high quality sustainable developments. It is concerned that the Regulation 19 Draft Plan introduces additional obligations and restrictions on development which will mean that future delivery of these sites will be more difficult which puts at risk the delivery of the Plan as a whole. We have set out in these representations constructive suggestions for modifications to the Plan that we believe will address these concerns and make it sound. For avoidance of doubt St. William would like to retain the opportunity to respond further, including to questions that the Inspector may have, and to attend hearings on the relevant topic areas. They look forward to working constructively with the Council to address these matters.</p>			

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635451	National Grid Property Holdings		LP195	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 30 :Bow Common Gas Works	No	Justified; Effective			Background National Grid Property is supportive of identifying the Bow Common Gas Works as a site allocation in the Local Plan as it is a vital site in regeneration terms and can provide a significant contribution to the Borough's housing need. Furthermore this site allocation has a significant role to play in terms of infrastructure provision and placemaking. However the allocation is believed to be unsound in terms of the requirements it places on the allocation. As with all the sites owned by National Grid Property there are likely to be significant abnormal costs associated with the redevelopment of the gas work including the costs of remediation and moving energy infrastructure. Viability therefore will be a crucial consideration in the deliverability of this site allocation and its success as a regeneration scheme. It is crucial that this is therefore recognised within the wording of the allocation. Furthermore paragraph 173 of the National Planning Policy Framework requires "sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". The allocation requires in addition to the provision of housing, the provision of a range of different size employment spaces, one hectare of strategic open space and a secondary school. Open Space Previous versions of the Plan have not categorically stated a quantum of the open space and it is considered, given the competing factors on this site, that the quantum of space should be determined at the planning application stage. The size of the space should not be the focus, it is better to place emphasis on quality so that this can be delivered well to ensure a functional, well utilised space is provided in the future. Placing an unnecessary minimum quantum of open space, risks impacting on the deliverability of the site in the future for much needed housing. With this in mind it is important that Figure 30 is amended to show open space indicatively at this stage. Employment Floorspace If the Council is to be successful in achieving its overall aim of meeting housing targets during the Plan period whilst also requiring sufficient open space in this location then the requirement to provide employment floorspace in this location needs to be fully justified. Any sort of large scale or low density employment use will significantly impact on the viability and deliverability of this site allocation and it is vital that sufficient levels of housing can be provided to support the wider viability and comprehensive redevelopment of the area. It should be noted that there are currently no employment uses on the site and the provision of employment uses on this site should be optional. Education Provision We consider the inclusion of a secondary school to be unduly onerous given this has	Yes		<p>Support of the site being allocated is noted.</p> <p>A note will be included under each site allocation diagram to state that it is for illustrative purposes</p> <p>The council maintains the site will come forward with key infrastructure. The configuration will be discussed through the EiP. The site is one of 5 sites that have been allocated for the provision of a secondary school. The council requires 4 sites to deliver secondary schools within the Plan period. The Viability assessment acknowledges that the cost of providing the school would have an impact on the provision of affordable housing. On this basis, further discussions will take place through the development management process to determine the precise nature of the contributions on site. The delivery of the school will also depend on the delivery of other schools and need/demand.</p> <p>As evidenced in the Open Space Strategy 2017-2027 Tower Hamlets needs more playing pitches to meet existing local demand. Population growth is forecast to further increase this demand. In addition to this the borough currently has an open space deficiency which constrains the scope of the council to grow the playing pitch offer without displacing other park users in the borough.</p> <p>In order to mitigate this deficiency and provide better access to open space, Bow Common Gas Works along with other key development sites in the borough has been identified to deliver a minimum of 1ha of consolidated strategic open space which is designated to provide multi-functional leisure and recreation uses.</p> <p>Due to the requirement to mitigate deficiency in the borough and the potential of the site to accommodate pitches, we do not consider that the reference to 'multi-functional leisure and recreation uses' should be removed. The finer detail of how the open space will function will be addressed through the development management process.</p>

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									not been justified since previous version of the Plan made reference to a primary school and there is an existing secondary school a very short distance away on St Paul's Way. The provision of a Secondary School on this site, combined with the minimum requirements for open space are very likely to make the development unviable. Conclusions For this site allocation to meet the tests of soundness for the Local Plan it needs to be deliverable and as set out above, in their current form, the burdensome requirements and obligations presented in this allocation make the allocation potentially undeliverable. It is important that changes to Site Allocation 2.1 include: • An acknowledgement that the site is constrained physically and financially due to its historic gasworks use. • Removal of the minimum requirement for an amount of open space on the site. • Label Figure 30 to state that the plan is 'indicative only' • Removal of reference to the Secondary School.			While the site is not a designated employment area, policy S.EMP1 makes clear that cumulatively non-designated sites can provide a significant quantum of floorspace. It would not be expected that the site would provide significant levels of employment floorspace. Nonetheless there is an opportunity to provide some employment floorspace and as such the text within the land use requirements for the site are considered appropriate.
1142559	Tim Brennan	Historic England	LP454	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 31 :Chrip Street town centre	N/A			This entire site sits within the Lansbury Estate conservation area which should be made explicit in the text.				Agreed. It is proposed to amend the wording as follows: • protect and enhance heritage assets on site and in the surrounding areas, including the Lansbury Estate conservation area to the west and Poplar Baths to the south ;
1142985	Transport for London (TfL)	Transport For London	LP743	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 31 :Chrip Street town centre	N/A			▪ The text and map should highlight accurately the role of walking and cycling, particularly in terms of the role Kerbey Street will play.				This matter will be discussed further at the Examination in Public
624910	Sir or Madam	Telford Homes PLC	LP282	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 31 :Chrip Street town centre	No				The proposed site allocation map at Figure 31 (page 203) has not identified the entire site allocation correctly. A planning application for the demolition of existing garages and erection of a children's Sure Start Centre was granted in October 2016 (ref. no. PA/16/02248). This site also forms part of the wider comprehensive redevelopment proposals for Chrip Street Market, which will see the relocation of the current Sure Start Centre within the existing market to Kerbery Street as part of this permission. The Centre should therefore be included within the wider site allocation for Chrip Street Market, as a district town centre.			The proposed boundary reflects the planning application and will remain the same. However the boundary of the town centre can be further reviewed as part of any future Local Plan review.

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719346	John Turner	Ballymore Group	LP277	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 4: Sub-area 3: Lower Lea Valley	No				Site – Goodluck Hope (Formerly Allocated as Hercules Wharf) It is noted that Hercules Wharf now known as Goodluck Hope is no longer listed as a development site within the Local Plan. While a planning consent for this site has been obtained and development is due to commence early 2018 it would seem premature to remove this site allocation at this stage where potential future alternative or additional proposals such as the redevelopment of part of Trinity Buoy Wharf could come forward. It is proposed that the Council therefore retain this clear policy justification for the redevelopment of the area to allow the effective and efficient delivery of the proposed schemes.	Yes		The removal of Hercules Wharf as a site allocation is set out in appendix 5 of the Site Allocations Methodology. It explains that the site has planning permission and construction works have commenced. The approved scheme does not deliver the required infrastructure, which is a key objective of site allocations.
1142985	Transport for London (TfL)	Transport For London	LP744	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 32 :Character places in Lower Lea Valley	N/A			<ul style="list-style-type: none"> ▪ Whilst TfL welcomes the acknowledgement of the importance of connectivity in this area, particularly in terms of bridge infrastructure, little narrative is provided about the importance of links to the east into LB Newham, including multiple transport interchanges such as DLR, which could provide more convenient ways to access opportunities. ▪ This is particularly important for figure 33, which could highlight this visually. ▪ The importance of linking this area to the south, including the transport opportunities around Canary Wharf, also needs to be highlighted. 			<p>Agreed. It is proposed to include the location of the all movements junction at Bow on the map and the proposed bridges at Bow, Leven Road and Ailsa Street, which connect to Newham.</p> <p>With regards to the importance of links to the east into Newham, this is addressed in the sub-area development principles of the Lower Lea Valley which refer to improving connectivity over the A12 and A13 which are the barriers to Canary Wharf.</p>	
1101459	Ben ffoulkes-jones	Aberfeldy New Village LLP	LP468	PART 4: DELIVERING SUSTAINABLE PLACES, 4.4 Paragraph	No	Positively prepared; Effective; Consistent with national policy			The Local Plan is not effective and fails the soundness test by not being positively prepared to meet the assessed development and infrastructure needs of this growth area and is not consistent with national policy. The Aberfeldy New Village LLP are in broad agreement with the principles adopted in the Local Plan for the Lower Lea Valley Sub-area, and the vision rightly emphasises the potential to deliver a significant number of additional homes and local employment opportunities. However, given this emphasis, and the fact that the Lower Lea Valley lies within an Opportunity Area, Intensification Area, and the Poplar Riverside Housing Zone, the Aberfeldy New Village LLP argue that a more pro active approach must be taken by the Council to maximising its potential, in line with the London Plan Policies for these areas. Paragraph 7 of the NPPF emphasises the role of planning to achieve sustainable development, in particular, an economic role "... by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation", and a social role, "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future			<p>The Site Allocations Methodology sets out how the infrastructure needs will be met. Information can also be found in the Infrastructure Delivery Plan which provides more detail.</p> <p>With regards to increasing density, the area is not within a tall building zone but policy D.DH6 makes provisions for tall buildings outside of the zones which will provide opportunities for intensification, subject to assessment against other policy criteria.</p>

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									generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being."Paragraph 14 of the NPPF emphasises that there is a strong presumption in favour of sustainable development, "which should be seen as a golden thread running through both plan-making and decision-taking." It goes on to state that for plan-making this means that, "local planning authorities should positively seek opportunities to meet the development needs of their area", meeting, "objectively assessed needs, with sufficient flexibility to adapt to rapid change"Finally, Paragraph 17 sets out a series of core principles with one of these being to:"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for a/locating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities"To make Paragraph 4.4 Sound the following additional bullet point should be added: • "maximise the potential of the Lower Lea Valley. Currently, developed at a low density, there will be opportunities within the area to increase density which will be explored and encouraged."			
635342	Aggregate Industries UK Limited		LP495	PART 4: DELIVERING SUSTAINABLE PLACES, 4.4 Paragraph	No	Effective; Consistent with national policy			To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan the objectives set out at para 4.4 should include reference to the safeguarded Bow West rail site. Required Changes: Amend last bullet point under para 4.4 as follows (additional suggested text shown bold and underlined): "Optimise former industrial/employment land and protect designated industrial areas and safeguarded rail sites whilst sensitively integrating industrial activities into their site context".	Yes		Policy S.TR1 makes provision for supporting and safeguarding such sites where appropriate. Policy D.TR.4 also ensures that development adjacent to wharves and rail depots does not compromise their operation. In light of the above, it is not considered necessary to include the proposed wording.
635711	London Concrete Ltd		LP496	PART 4: DELIVERING SUSTAINABLE PLACES, 4.4 Paragraph	No	Effective; Consistent with national policy			To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan the objectives set out at para 4.4 should include reference to the safeguarded Bow West rail site. Required Changes: Amend last bullet point under para 4.4 as follows (additional suggested text shown bold and underlined): "Optimise former industrial/employment land and protect designated industrial areas and safeguarded rail sites whilst sensitively integrating industrial activities into their site context".	Yes		Policy S.TR1 makes provision for supporting and safeguarding such sites where appropriate. Policy D.TR.4 also ensures that development adjacent to wharves and rail depots does not compromise their operation. In light of the above, it is not considered necessary to include the proposed wording.

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1142985	Transport for London (TfL)	Transport For London	LP745	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 33 :Vision for Lower Lea Valley	N/A			▪ There are aspirations by the borough to deliver other bridges in this area, including for public transport (e.g. Bromley-by-Bow Tesco and Strand East development). Should these be included?				Agreed. The location of the proposed bridges and all movements junction can be shown on the map (vision for Lower Lea Valley - figure 33)
635711	London Concrete Ltd		LP498	PART 4: DELIVERING SUSTAINABLE PLACES, 4.6 Paragraph	No	Effective; Consistent with national policy			Objection: To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan the development principles set out under para 4.6 should include reference to the safeguarded Bow West rail site and the requirement that its operation should not be prejudiced. Required Changes: An additional development principle should be added, suggested text is as follows: "Development adjacent to the safeguarded Bow West rail site is required to ensure it does not compromise its existing or future operation".	Yes		No change proposed. The site falls within the boundary of the London Legacy Development Corporation (LLDC), who are the local planning authority for that area. As such, the site is subject to the LLDC's Local Plan policies. It should be noted that policy D.TR4 of LBTH's emerging Local Plan protects the operation of rail depots.
635342	Aggregate Industries UK Limited		LP497	PART 4: DELIVERING SUSTAINABLE PLACES, 4.6 Paragraph	No	Effective; Consistent with national policy			Objection: To ensure consistency with national policy for safeguarding of rail sites and effectiveness of the Local Plan the development principles set out under para 4.6 should include reference to the safeguarded Bow West rail site and the requirement that its operation should not be prejudiced. Required Changes: An additional development principle should be added, suggested text is as follows: "Development adjacent to the safeguarded Bow West rail site is required to ensure it does not compromise its existing or future operation".	Yes		No change proposed. The site falls within the boundary of the London Legacy Development Corporation (LLDC), who are the local planning authority for that area. As such, the site is subject to the LLDC's Local Plan policies. It should be noted that policy D.TR4 of LBTH's emerging Local Plan protects the operation of rail depots.

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1142150	Tim Gaskell	Landowner Consortium and Aitch Group	LP86	PART 4: DELIVERING SUSTAINABLE PLACES, 4.8 Paragraph	No	Justified			See attached letter of representation. Text also set out below for completeness (which also relates to policies S.EMP1 and S.MW1. LB Tower Hamlets, Place Directorate Planning & Building Control Strategic Planning Mulberry Place 5 Clove Crescent London E14 2BG 13th November 2017 Dear Sir / Madam, St Andrews Way / Empson Street / Towcester Road, Bow, E3 Tower Hamlets Local Plan – Regulation 19 Consultation We are writing with regards to the draft LBTH Local Plan which is currently the subject of public consultation and wish to make representations with regards to the above site, as set out below. In summary, we object to the Strategic Industrial Location and the Waste Safeguarding. We consider the area should have a site allocation to bring forward a mixed use redevelopment. The Position Today The site lies within the London Borough of Tower Hamlets. The buildings on the site are predominantly two/three storey industrial units. The 10 ha site comprises three distinct areas: • warehousing/distribution units on St Andrews Way; • older industrial stock behind Empson Street; and • smaller storage/distribution units and an arts centre on Towcester Road. In total, the site contains approximately 44,000 sqm of commercial floorspace. Immediately adjacent the north-west corner of the Site is Devons Road DLR Station, beyond which a residential development (by Peabody) is under construction. Bromley-by-Bow Underground station is approximately a 250m walk to the north and Bow Road Underground Station is approximately 500m north-west. As such, the site is well connected by public transport. The surrounding area is characterised by a mix of uses, but mostly residential, with homes and flats located to the north, south and west. The only exception is a small element of the site which fronts onto the A12. The site also has a long frontage to the Limehouse Cut canal. The site also has access to the A12 via Devas Street to the north, however, this access goes through a residential area. The Site does not contain any listed buildings or locally listed buildings, or trees subject to Preservation Orders. Planning Policy – Draft In the draft Tower Hamlets Local Plan, the site has the following designations: • Strategic Industrial Location (SIL); • Safeguarded Waste Site (a small area in the middle part of the Site); and • Site or area suitable for waste management (applies to the whole Site). Opportunities SIL Use The Site is within a Strategic Industrial Location (policy S.EMP1) and is classed as an Industrial Business Park (IBP) in the London Plan. In general this policy resists residential development, unless it complies with the planning decisions criteria. Nonetheless, SIL designation does not automatically preclude development with 'Criteria b' of LP Policy 2.17 stating that development proposal	Yes		The SIL designation is set by the GLA. The supporting text of London Plan policy 5.17 notes that SILs will provide the major opportunities for locating waste treatment facilities. London Plan policy 5.17 safeguards waste sites through ensuring that if waste management site is lost then compensatory capacity will be provided. Policy S.EMP1 of the Local Plan makes it clear that residential uses are not appropriate within the SIL due to the potential conflict with existing and future industrial uses. It has been noted that waste operations are associated with the main business however London plan policy 5.17 requires waste sites to be safeguarded unless compensatory capacity is provided.

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									<p>should be refused unless: b) "they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document" This shows how where is an opportunity for a comprehensive approach to this Site and that industrial activities could be modernised, more flexible and intensified. Furthermore if it could be shown that development within the SIL does not affect the functioning and integrity of industrial type activities, then there is a case to be made that mixed use residential can be supported at the Site. In addition to this Policy, the supporting text highlights that there is a case to be made for regeneration at the Site, where IBP need 'better quality surroundings'. Currently, it is questionable whether this IBP sufficiently provides this environment. Therefore, regeneration could benefit existing businesses and attract new industrial activities such as the SME's to the Site. The LBTH Employment Land Review emphasises the demand from the creative and Technology, Media and Telecom (TMT) sectors which could be appropriate at this Site. The LBTH Employment Land Review (Draft November 2016) indicates that there is old building stock which is not built for industrial purposes and unlikely to meet modern industrial requirements. It is therefore likely that would require demolition/refurbishment, which would entail significant cost in itself that may result in rent increases that current or future occupiers may not be able to cover. In relation to the GLA vision for this area, there are again conflicting policies where the Site is within the Poplar Riverside Housing Zone, but the Site is classed as a SIL in particular an Industrial Business Park. As such there is the potential to help with the delivery of both SIL and the housing zone through the implementation of a mixed use scheme. Waste Management Use A small part of the wider site remains designated as a Safeguard Waste site in the draft Local Plan (Policy S.MW1), although it is acknowledged that this area has been reduced from the previous version and now just relates to a small parcel some 0.144 ha in size). As set out previously, this part of the site is owned and operated by Clifford Devlin, who in summary, are a demolition business. They carry out all types of demolition involving medium-rise office blocks to schools, hospitals, cinemas, infrastructure projects and residential accommodation. They also have a Building and Special Works division which offers a comprehensive range of building services from structural alterations to concrete and builders trade packages to support complex refurbishment and renovation projects. Finally there is a Licensed Asbestos Division which provides removal, disposal and management planning services to assist dutyholders with their</p>			

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									<p>responsibilities under the Control of Asbestos Regulations 2012. The site supports these activities and is generally used for the storage of machines and equipment which support demolition activities. As part of the Licensed Asbestos Division, Clifford Devlin operates its own asbestos waste transfer station which is licensed by the Environment Agency (Permit No. 80134) for managing the disposal of asbestos containing material. The facility is capable of processing up to 32 cubic metres of asbestos waste on a daily basis and can be used by clients who require immediate disposal of damaged or fly-tipped asbestos containing material. The waste operations relates to this Asbestos work only, and only as part of the wider demolition work carried out by the company. It is worth noting the Asbestos licence was only applied for due to a specific project requirement. It is also a very small quantity as well. Clearly some waste disposal takes place at this site, but it is not considered a waste site in itself, as that activity is ancillary to the main demolition business. There are no proposals or plans to change this in the future. Clifford Devlin operates and run their business effectively from this site and would strongly resist any proposals which forced them to change their business or relocate. Furthermore, the owner occupier has sub-let a number of the buildings on site as offices to local businesses, which makes any change harder to do, even if it was felt to be desirable. For the same reason, we also object to the wider area being included as an area of search for new waste sites in Tower Hamlets. We understand that waste management is a pressing strategic issue and the Borough is working towards achieving net self-sufficiency by 2026. Whilst we do not disagree with this, we must highlight that this site is not a waste site, and has no plans to become one. As such, identifying this site for waste management and the wider site as an area of search is flawed and would result in an unsound Local Plan. The NPPF says Local Plans should be aspirational but realistic. This allocation would fail this requirement. It also says Local Plans should be deliverable over its period, again, something which would not be achieved. Given this, we cannot see how you could demonstrate to the Planning Inspector that we have identified sufficient land for the management of waste. We would suggest the other seven sites set out in the Local Plan are examined for these specific designations. The Future Given the above, it would seem sensible to review current uses of the site and consider how the uses may be accommodated on a mixed use site, for example through size zoning and densification. This would enable it to be demonstrated that industrial, and potentially some compatible waste management could be combined with residential uses at the Site. By way of example, Aitch are delivering a</p>			

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									<p>scheme nearby, The Island site on Rothbury Road in Hackney Wick. Permission was obtained for 181 homes (which included affordable provision) and 5900 sqm of commercial floorspace on a 0.8 ha site. Here are some images of the scheme. The commercial space was split over the site, some mixed with the residential uses, but also some in stand-alone commercial blocks. If these ratios were factored up to a 10ha site, it would equal 2260 homes and 73,750 sqm of commercial. The commercial could be mixed with the residential, or as with the Island site, could be developed in its own 'commercial quarter'. The existing floorspace on site is around 44,000 sqm, so these show that commercial levels could be increased by 70% and over 2000 homes provided. Or alternatively, commercial levels could be maintained and other benefits provided, such as a higher level of affordable homes, or community facilities such as a new primary school. Even if commercial space is maintained at current levels, it is envisaged that job numbers would increase significantly due to the provision of newer, better quality buildings. This could result in a development as shown below. We consider that this wider area should be included as a Site Allocation for mixed use redevelopment.</p>			
1102564	Richard Hill	Thames Water Utilities Ltd	LP783	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 35 :Ailsa Street	N/A			<p>Site ID 51701 Site Name Ailsa Wharf, Ailsa Street, London Water Response The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what water infrastructure is required, where, when and how it will be delivered. Waste Response There are public sewers crossing this site, and no building works will be permitted within 3 metres of the sewers without Thames Water's approval. Should a building over / diversion application form, or other information relating to Thames Waters assets be required, the applicant should be advised to contact Thames Water Developer Services on 0845 850 2777. We expect the surface water disposal hierarchy to be implemented for this</p>			<p>Policy D.ES6 requires major developments to demonstrate that the local water supply and public sewage networks have adequate capacity Other matters raised will be addressed through the development management process.</p>	

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								site as direct connection to the watercourse may be appropriate. Any connection to the public sewer will need to be at Greenfield run-off rates or lower. To assess network capacity we would require the size and scale of the proposed development. We would need to agree an appropriate point of connection for foul water onto the public sewer system to ensure capacity exists. We expect a clear understanding of pre-development points of connection and peak discharge rates.				
1053309	Jane Wilkin	Environment Agency	LP259	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven Road Gas Works	No				If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. If needed please continue on a separate sheet of paper. We raised in our previous comments that this site would be required to demonstrate that the development would not preclude the implementation of the Thames Estuary 2100 plan. We are pleased to see that the supporting text of DES4 highlights the Thames Estuary 2100 plan and recommendations. The plan would be strengthened by including the reference to the plan within the site allocations. The last bullet point of the delivery considerations should be expanded. Suggested wording: Development should accord with flood mitigation and adaptation measures in the borough's SFRA <DELETE 'and'> sequential test <INSERT>and Thames Estuary 2100 plan.	Yes		Proposed change agreed. Development should accord with flood mitigation and adaptation measures in the borough's SFRA strategic flood risk assessment, and sequential test , and Thames Estuary 2100 Plan.

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1053309	Jane Wilkin	Environment Agency	LP257	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven Road Gas Works	No				NOTE THAT THE EA DO NOT CONSIDER THE PLAN TO BE UNSOUND BUT THEY HAVE MADE THE FOLLOWING COMMENTS: We raised in our previous comments that these sites are adjacent to watercourses which have Water Framework Directive actions assigned to help improve the status of the waterbody as set out in the evidence base – the Thames River Basin Management Plan. We note that our requests for additional wording in the site allocations relating to delivering Water Framework Directive actions have not been incorporated. We feel this is a missed opportunity to ensure that the allocated sites include specific actions to ensure that the objectives within the Thames River Basin Plan can be delivered. Particularly as Regulation 17 of the Water Environment Regulations 2003 (WFD) places a duty on local planning authorities to ‘have regard to’ River Basin Management Plans (RBMP). We do not consider that the WFD actions in the evidence base have been fully drawn upon within the design guidelines and development considerations for these sites. The design principles should be expanded for these sites to highlight the opportunities for improvements to the watercourse through the development of the site. Suggested wording: Development will be expected to implement the actions identified in the River Basin Management Plan to support delivery of the objectives of the plan, in accordance with Regulation 17 of the Water Environment Regulations 2013.	Yes		The proposed wording will be incorporated into the delivery considerations to reflect policy S.OWS2. Development will be expected to implement the actions identified in the Thames River Basin Management Plan to support delivery of the objectives of the plan, in accordance with regulation 17 of the Water Environment Regulations 2013.
1053309	Jane Wilkin	Environment Agency	LP253	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven Road Gas Works	No				NOTE THAT THE EA DO NOT CONSIDER THE PLAN UNSOUND BUT HAVE SAID THE FOLLOWING: We raised in our previous comments that these sites have been subject to historic uses which have the potential to have resulted in land contamination, however this has not been included within the delivery considerations for the allocations. Land remediation is a significant consideration in the delivery of a development as in some cases it can take a long time to undertake assessments and remediation to enable commencement of the development. Assessments are required for these sites as part of the planning application to understand the potential contamination on site. The delivery considerations should be expanded for these sites to highlight the previous historic uses of the site which may have resulted in land contamination. Suggested wording: Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.	Yes		The delivery considerations can include the suggestion for an assessment to be undertaken prior to any development taking place, however, the site allocations will not go into the level of detail as to what specific historic uses took place on the site. Proposed wording: • An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
1142985	Transport for London (TfL)	Transport For London	LP746	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven	N/A			▪ Further discussion with TfL is required as to the deliverability in terms of any future potential bus routes that could serve this site.				Comment noted. Discussions with TfL will take place regarding any future potential bus routes.

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				Road Gas Works								
1142327		St. William	LP215	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven Road Gas Works	No	Effective; Consistent with national policy			<p>a) Introduction and Scope We are writing on behalf of St. William in response to the consultation on your draft Local Plan. St. William, the joint venture between National Grid and the Berkeley Group, has an interest in three of the site allocations in the Draft Local Plan: • Marian Place Gas Works and the Oval • Leven Road Gas Works • Bow Common Gasworks These representations relate to the site-specific allocations for those sites. The Berkeley Group of which St. William is part, has submitted representations on the Strategic and Development Management policies in the revised Draft Plan. These cover four critical policy areas in the Plan which are of concern: • Developer contributions and planning obligations • Design • Housing • Schools, Open Space, and Other Community Facilities All of these issues also cross-relate to the site-specific allocations, which illustrate some of the group’s key concerns, and therefore the two sets of representations should be read alongside one another. b) Overview The table below shows the sites in which St. William has an interest. Leven Road and Bow Common Gasworks are in single ownership whilst the Gasworks part of the Marian Place/Oval site comprises approximately half of the site allocation. St. William welcomes their allocation in the Draft Plan. Site Area Status Capacity Leven Road Lower Lea Valley Opportunity Area & Poplar Housing Zone 1,485* Bow Common Poplar Housing Zone 468* Marian Place/Oval City Fringe Opportunity Area 630* Total 2,583 * Indicative homes identified in LBTH Viability Study (2017) As current or former Gasworks sites they all have very significant remediation costs and also ongoing requirements to provide gas infrastructure including accessible underground gas pipelines and operational pressure reduction stations (PRS), which place ongoing development restrictions to accommodate the required easements and safety zones on parts of the sites. This reduces the developable area assumed by the Council. The retention of any Gasholders also has very significant cost implications. Even if not re-purposed for an active use their retention requires them to be dismantled, transported significant distances for refurbishment, reinforced when returned to the site during reassembly, and maintained and insured by future residents. For the two sites in the Draft Plan where the policy currently requires retention of some of the Gasholders this does not appear to have been taken into account in the viability assessments. St. William is currently in pre-application discussions with the London Borough of Tower Hamlets on the Leven Road site. The other two sites are still at pre-planning stage. The Draft Local Plan does not identify housing targets</p>			<p>The council has allowed for significant remediation costs for all three of the site allocations which are on gas works sites. The viability assessment shows that the site is viable alongside the provision of a lower level of affordable housing.</p> <p>In terms of the ongoing requirements to provide gas infrastructure on site, the Council would welcome further information in this regard and in particular the extent to which this will impact on the viability assumptions made (e.g. will it decrease site area?). However, changes to the design principle have been outlined below.</p> <p>Any employment uses on this site would be de minimises relative to the residential uses on site. Accounting for these employment uses will have minimal impact on the viability of the scheme but if anything would make the site marginally more viable.</p> <p>The Council notes the requirement to retain the gasholders and would welcome information relating to the costs of doing so – the Council understands that the planning applicant has undertaken work in this regard already. The Council notes that the costs of this requirement could vary widely depending on the extent of the retention which will depend on the specific design of the site.</p> <p>In terms of the provision of affordable workspace, the provision of employment uses on this site will be very minor relative to the provision of residential floorspace which has been the focus of the testing. If the Council were to include employment floorspace as part of its testing then it would make the site more viable, even after accounting for the affordable workspace policy.</p> <p>The capacity of sites will be discussed through the development management process.</p> <p>The housing trajectory does not include details beyond the 5 year supply. Details regarding the capacity of sites within the 15 year period are confidential.</p>

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								<p>for the individual site allocations other than to note that they are sites with capacity for over 500 homes (para 2.11). However, the Viability Study (2017) includes indicative numbers of homes in the site-specific assessments and these are shown in the table above. As far as we are aware none of the published evidence base identifies the contribution these sites are expected to contribute to the housing trajectory contained in Appendix 7 of the Draft Plan. However, both Bow Common Gasworks and Leven Road Gasworks are identified in Appendix B of the Five-Year Housing Land Supply and Housing Trajectory Statement as sites which have been assessed as being able to provide deliverable supply within the plan period. The evidence base document, London Borough of Tower Hamlets Housing Delivery Strategy (September 2017) sets out in Section 8 how the Council intends to address its shortfall in supply. It specifically identifies (in paragraphs 8.18 to 8.20) the Poplar Housing Zone as a location where interventions are likely to mean that delivery will be greater than currently assumed. It also suggests that the GLA may produce an updated Lower Lea Valley Opportunity Area Planning Framework (OAPF) focused on Poplar Riverside to maximise the opportunity and the delivery of family housing. Paragraphs 8.4 and 8.5 of the strategy note that average densities are used for site allocations without planning permission and where no further capacity details are available but that it is likely that: "these sites may deliver more homes than has been currently assumed". If we use the assumptions in the Viability Study, which are based on assumed density ratios, they equate to just under 5% of the total known projected housing supply in the Borough (Draft Local Plan, Appendix 7), and 20% of capacity on site allocations without permission. They are therefore critical to the delivery of the Local Plan targets, particularly as the Council is relying on over 8,330 homes being delivered as windfalls or unidentified sites. It is therefore critical that the indicative numbers above are seen as a minimum and the capacity of allocated sites is maximised. Our overriding concern is that the Council's own evidence for these sites when it produced its Managing Development DPD demonstrated that the weight of obligations placed on the sites at that time meant that they weren't viable. The new Draft Plan adds further requirements and restrictions on the sites, which reduce developable site area, limit development capacity and add further obligations. The Council has also introduced its Community Infrastructure Levy charging schedule, and has stated that it will be updating this alongside the Local Plan. St. William is very keen to continue to work positively with the Council to ensure that the capacity of the sites to</p>			<p>The Viability Study does not need to account for the cost of open space or enhanced public realm – to the extent that these elements of the site are infrastructure then they will be funded using the Community Infrastructure Levy which has been accounted for in full.</p> <p>The Council disagrees; costs for land remediation have been appropriately taken into account.</p> <p>The approach to land value is the most appropriate for testing Local Plans and the approach is very much in line with the Viability Testing Local Plans: Advice for Planning Practitioners document produced by the Local Housing Delivery Group Harman guidance on testing Local Plans. This guidance recommends that BLVs are "based on a premium over current use values" with the "precise figure that should be used as an appropriate premium above current use value [being] determined locally". The guidance considers that this approach "is in line with reference in the NPPF to take account of a "competitive return" to a willing land owner". The use of a 20% premium is consistent with testing associated with numerous other Local Plans and CIL Charging Schedules.</p> <p>Provision of new employment floorspace numbers through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail.</p> <p>The wording of the gasholders will be amended to reflect current situation:</p> <ul style="list-style-type: none"> • Retain and reuse parts of the dismantled gas holder no. 1 within the future development. <p>There is a policy on tall buildings outside of tall building zones. Applications that meet the policy requirements, along with the requirements of other applicable policies will be acceptable in principle. However additional wording will be included at the end of paragraph 3.75 in relation to tall buildings:</p> <p>Proposed wording:</p>

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								<p>deliver housing, including affordable housing, and wider placemaking requirements, including social infrastructure and open space can be achieved whilst ensuring that the sites are viable and deliverable. At present St. William is of the view that the Plan is unsound in relation to these three site allocations, because it is not effective (i.e. deliverable) and because it is inconsistent with the National Planning Policy Framework (NPPF), paragraph 173 which states: Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.” We set out below some constructive suggestions in relation to each site which we believe can help make the Plan sound. d) Leven Road Gasworks i) Site Allocation 3.2 St. William is pleased that the site allocation for Leven Road is proposed within the draft Local Plan, situated as it is within the Lower Lea Valley Opportunity Area and Poplar Riverside Housing Zone. The allocation recognises the very significant role that the site will play in delivering regeneration, helping meet housing targets as well as infrastructure provision and placemaking in important parts of the Borough. As with the other two sites it is necessary for the Council to be explicit in its evidence base about the assumed capacity of the site, for housing and other uses, to understand whether not only the baseline assumption can be delivered but whether the approach will, following London Plan Policy, maximise capacity, which it is a requirement to do, given its location in both an Opportunity Area and a Housing Zone. ii) Impact of Obligations and Requirements on Deliverability The regulation 19 Draft of the Local Plan very significantly increases the burden of obligations upon the site and now includes a Secondary School (currently a primary school in the adopted plan and a primary/secondary school in the previous Regulation 18 draft) and a 1 hectare open space. The Viability Assessment (2017) undertaken to support the Plan assumes that it would be 1.5 hectares. Together these allocations reduce developable area of the site by 2.5 hectares. We would highlight that two of the other allocated sites (London Dock and Westferry</p>			<p>Where possible, we will seek to work with developers, landowners, statutory agencies and neighbourhoods to develop masterplans to guide the scale and location of tall buildings, taking account of their wider and cumulative impacts, in line with the requirements set out above. This includes proposals involving tall buildings located within site allocations where these are considered to be appropriate and in line with relevant policies.</p> <p>1ha is the size that the London plan defines strategic open space. Strategic open space has been allocated to address the boroughs deficiencies and to accommodate active recreation in accordance with policies S.OWS1 and D.OWS.3</p> <p>The wording will be amended to make it clear that land is required to facilitate the delivery of the bridge</p> <ul style="list-style-type: none"> provide and secure the necessary safeguard land within the site to facilitate the delivery of a new bridge crossings over the River Lea to improve access to the major transport interchange at Canning Town and ensure continuity of a green link to Cody Dock ; and ensure that the safeguarded land is carefully incorporated into the future development and the Leaway <p>The wording will be amended to reflect that the bus will go to the site instead of through. The walking distance is acceptable if the bus does not go through the site.</p> <ul style="list-style-type: none"> facilitate a new or extended bus route to serve through the site to enhance access to public transport. <p>The wording in the delivery considerations will be amended to reflect that decontamination mitigation costs should be acknowledged.</p> <p>Proposed wording:</p> <p>Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site</p>

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									<p>Printworks) have planning permissions which include c. 0.5 hectare secondary school sites. The Council's own evidence (see Section F below) demonstrates that, taking the 2.5 hectare area combined with some of the significant abnormal costs for the development of a gasholder site, the current proposed obligations mean that the site is not viable., and this does not include some other policy requirements such as 'affordable workspace' and retention of the existing Gasholder. In order to demonstrate that the site is viable the Council needs to show how in practical terms the weight of obligations will be reduced and include that in the policy. In line with Berkeley Group's representations on the policy DCF.3 the Site Allocation should note that the need for secondary school provision should be monitored and the site released if demand does not come forward. iii) Employment Floorspace The site allocation includes the provision of housing and employment space. As with the other gasworks site, the previous Gasworks use on the site was Sui Generis and the existing use of the site for open storage does not involve any significant 'employment' floorspace. As such it is not considered accurate for the Land Use section to refer to the re-provision of existing employment. Policy reference to provision of small-to-medium enterprises, creative industries and retail uses is supported, and could also include other service sector employment. We would also note that no allowance appears to have been made for this policy position in the Council's Viability Assessment. iv) Design The site allocation specifies Design Principles. The requirement that the heritage assets including the No 1 Poplar Gasholder be retained, re-used or enhanced should be amended to reflect the implementation of PA/16/02340/NC for the Demolition of three gasholders, meter house, small ancillary buildings and above ground pipework, approved 2 Sep 2016. Following discussion with the Council, parts of the demolished gasholders are likely to be retained in storage with the aim of re-using them within the future development as recognition of the site's historical use. Accordingly the text should state the retention, reuse or enhancement of parts of the dismantled heritage asset should be considered in accordance with a Heritage Implementation Strategy or Public Arts Strategy to be agreed with the Council. We would note that no allowance appears to have been made for this policy position in the Council's Viability Assessment. The site is outside a designated Tall Buildings zone but meets several of the criteria for tall buildings outside these zones set out in draft policy D.DH6 (3), including where such buildings allow capacity for new open space which is a requirement for the site. Berkeley Group has suggested that the criteria in this policy should also be expanded to</p>			<p>decontamination requirements caused by the gas works.</p> <p>It is not considered necessary to include wording regarding limited access to public transport the PTAL is already stated in the site allocation.</p> <p>It is not considered necessary to include 'where' feasible to the delivery consideration regarding the phasing of open space as the term 'should' allows for flexibility.</p> <p>Amend the design principle as follows:</p> <ul style="list-style-type: none"> •respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its riverside location. It will require active street frontages that fit well with the existing 2-storey terraced houses facing the site and sensitive to the scale of the adjacent 2-storey residential area, and the amenity of rear gardens backing on to the site. In particular, it should deliver an appropriate transition in scale, sensitive to the amenity of adjoining residential properties and buildings in close proximity. The new streets should complement the existing network and deliver active frontages.

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									<p>include Opportunity Areas and other designated locations such as Housing Zones. For avoidance of doubt the design principles in the site allocation should refer explicitly to the potential for taller buildings on the site, subject to an appropriate relationship with surrounding uses set out in the first bullet point under Design Principles. This is implied in the policy but is not explicit. v) Housing The policy position to “maximise the provision of family homes” is supported, however, this is dependent upon the wider scheme delivery including a wide range of other social infrastructure aspirations. Accordingly the text should be amended to conclude “where feasible”. vi) Open Space The text states “ensure the open space is designed and usable for sport and recreation and located adjacent to the River Lea...”. The provision should be across the site rather than adjacent to the River Lea and is dependent on the evolution of the masterplan to take account of the wider proposal offer in line with deliverability and feasibility. The text continues to refer to the need when designing the open space for sport and recreation, this should also take into account “...water spaces.” The River Lea is acknowledged as being an asset to be incorporated within the design and the opportunities for leisure and recreation it may provide. However, concerns are raised as to restrictions on constant access and use of the River Lea owing to its tidal nature, the local microclimate, the need for wider placemaking and final scheme delivery. This should be acknowledged in the text as potentially being a factor to prevent such use coming forward permanently in any future proposals. The supporting text states “provide and secure the necessary land to facilitate the delivery of a new bridge over the River Lea.” It is a desirable long-term outcome to enable connectivity in and around the River Lea Park and the incorporation of land within the site allocation made available to the future provision of a footbridge is supported. However, the delivery of a bridge cannot be secured through the Local Plan given that the other side of the bridge would be outside LB Tower Hamlets, within LB Newham, and on land owned by a third party. Provision of such a bridge is not regarded as essential in order to unlock the site for development or as the only means to achieve good accessibility from the surrounding area. The text should be revised accordingly: “provide and secure the necessary land within the allocated site in order to facilitate the delivery of a new bridge within LB Tower Hamlets over the River Lea.” We would note that no allowance appears to have been made for the cost of Open Space or enhanced public realm in the Council’s Viability Assessment other than a deduction of land from the developable area and a general allowance for</p>			

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								<p>'externals'. vii) Transport The text states "facilitate a new or extended bus route through the site to enhance access to public transport." The text should be amended to reflect a new or extended bus route may not occur through the site, but may occur adjoining the site. Accordingly, the text should state "facilitate a new or extended bus route to the site to enhance access to public transport." viii) Delivery Under "Delivery Considerations" costs associated with the decommissioning of the gasworks are acknowledged. Whilst, inter-alia, reference is made to the costs to address any environmental pollution caused by the gas works, inclusion of specific reference to de-contamination mitigation costs within the site should also be made. Reference to encouraging sustainable modes of transport as an alternative to private car use is supported in principle, i.e. through public transport and a walking and cycling bridge. However, the text should be amended to reflect the limitations any new development would have to ensure such provision off site. This should be reflected by amending the text to state "facilitate access on site to public transport and delivery of a walking and cycling bridge...". The provision of new open space, both soft and hard, within any development of the site is supported. However, the delivery of the open space through the phased development is dependent on many conflicting and influencing factors, including the ultimate masterplan layout and technical implementation. Accordingly, the text should be amended to take account of these factors and recognise the delivery may be agreed once the acceptable scheme is arrived at and "...where feasible" should be added to the end of the text.</p> <p>Figure 36: Leven Road Site allocation plan should be noted as being 'indicative only'. f) Viability Assessment The draft Local Plan is supported by London Borough of Tower Hamlets Local Plan Viability Assessment (September 2017). This includes, in Section 7, indicative viability assessments for the three Gasworks sites (sites 2, 11 and 14). Appendix 13 includes the full assumptions and results for each site.</p> <p>Notwithstanding the concerns highlighted above about abnormal costs, ongoing operational requirements and restrictions on development to deliver the required development, the Council's own evidence concludes that both Leven Road and Bow Common Gasworks are unviable (Table 7.11.1, page 82) as a result of abnormal costs and the combined weight of planning obligations. It finds that Marian Place Gasworks is marginally viable. This assumes considerably higher densities than the other two sites which may not be achievable given the site-specific constraints and policy restrictions described above. St. William is also concerned that the approach to site</p>			

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									remediation costs and land value does not meet the requirements to provide 'competitive returns to a willing buyer and willing seller' of paragraph 173 of the NPPF. This is particularly important for sites that are owned by a utility company which needs to be appropriately incentivised to bring its land forward for development and can take a long-term view of that. Without this there is the risk that sites crucial to plan delivery will not be brought forward for development. This emphasises the need for more clarity from the Council on its assumptions and specifically its priorities and approach to flexibilities in the application of policy to provide certainty that the sites are deliverable, as stated in the Five-Year Land Supply and Housing Trajectory Statement. This is required to ensure that the plan is effective, and therefore sound. g) Summary St. William has an interest in three of the sites identified in the Draft Plan, accounting for 20% of capacity on allocated sites that do not benefit from Planning Permission. It is keen to work positively with the Council, as Berkeley has done on other sites, to bring these sites forward for development and help deliver the new homes, open spaces and infrastructure that the Borough requires as part of high quality sustainable developments. It is concerned that the Regulation 19 Draft Plan introduces additional obligations and restrictions on development which will mean that future delivery of these sites will be more difficult which puts at risk the delivery of the Plan as a whole. We have set out in these representations constructive suggestions for modifications to the Plan that we believe will address these concerns and make it sound. For avoidance of doubt St. William would like to retain the opportunity to respond further, including to questions that the Inspector may have, and to attend hearings on the relevant topic areas. They look forward to working constructively with the Council to address these matters.			
635451	National Grid Property Holdings		LP197	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 36 :Leven Road Gas Works	No	Justified; Effective			Background National Grid Property is supportive of identifying the Leven Road Gas Works as a site allocation in the Local Plan as it is a vital site in regeneration terms and can provide a significant contribution to the Borough's housing need. Furthermore this site allocation has a significant role to play in terms of infrastructure provision and placemaking. However the allocation is believed to be unsound in terms of the requirements it places on the allocation. As with all the sites owned by National Grid Property there are likely to be significant abnormal costs associated with the redevelopment of the gas works including the costs of remediation and relocating infrastructure. Viability therefore will be a crucial consideration in the deliverability of this site allocation and its success as a regeneration scheme. It is crucial that this is therefore recognised within the	Yes		Support for the site being allocated noted Discussions have taken place between council officers and the developer which will outlined within a statement of common ground and any outstanding matters will be addressed through the EiP. The delivery considerations make reference to the costs associated with the gasworks 1ha is the size that the London Plan defines open space as having. Strategic open space has been allocated to sites to address the boroughs open space deficiencies and to accommodate active recreation and sport in accordance with policies S.OWS1 and D.OWS.3. Positioning the open space adjacent to the River Lea integrating with the proposed new river crossing will

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									<p>wording of the allocation. Furthermore, paragraph 173 of the National Planning Policy Framework requires “sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”. The allocation requires in addition to the provision of housing, the provision of a range of different size employment spaces, one hectare of strategic open space, a secondary school, the retention, reuse and enhancement of Gasholder No. 1 and the land to facilitate delivery of a bridge over the River Lea. Open Space Previous versions of the Plan have not categorically stated a quantum of the open space and it is considered, given the competing factors on this site, that the quantum of space should be determined at the planning application stage. The size of the space should not be the focus, it is better to place emphasis on quality so that this can be delivered well to ensure a functional, well utilised space is provided in the future. Placing an unnecessary minimum quantum of open space, risks impacting on the deliverability of the site in the future for much needed housing. In addition, the policy requirement is overly restrictive as it states that the open space should be located adjacent to the River Lea. National Grid considers that the location of the open space should be distributed across the site in accordance with any emerging masterplan on the site. Its distribution can be considered carefully at the appropriate time. In addition, Figure 36 should be amended to be ‘indicative’ and to show open space distributed across the site, rather than in one location along its western boundary. Employment Space If the Council is to be successful in achieving its overall aim of meeting housing targets during the Plan period whilst also requiring sufficient open space in this location then the requirement to provide employment floorspace in this location needs to be fully justified. Any sort of large scale or low density employment use will significantly impact on the viability and deliverability of this site allocation and it is vital that sufficient levels of housing can be provided to support the wider viability and comprehensive redevelopment of the area. Family Housing The requirement to ‘maximise the provision of family homes’ seems at odds with other proposed policies in the Plan. Policy D.H2 sets out a table which requires a range of unit sizes. Whilst family housing is an important element of the Site Allocation, it is important that this is considered on a site specific basis and provides a balanced housing mix across the whole site. This will evolve further as detailed design proposals for the site emerge. Education Provision We consider the inclusion of a secondary school to be unduly onerous given this has</p>			<p>contribute to the creation of a continuous well-connected publicly accessible open spaces and water spaces across the borough. This is in line with the design principles identified in the Lea River Park Design Manual. In addition, the new open space will create a better integration between the borough’s open and water spaces and will promote a safer and more enjoyable public access to the river, which has many health and wellbeing benefits. This is in line with policy S.OWS2. This is also in line with the principles identified in the Water Space Study which highlight that the integrated delivery of the green grid and water space opportunities would provide better connectivity for pedestrians across the borough. Site allocation plans will state that they are indicative The provision for the requirement for employment space is considered to be appropriate on site. The minimum amount of floorspace has not been specified so is not considered to be too onerous.</p> <p>Matters regarding family housing will be discussed further at the examination in public.</p> <p>The Infrastructure Delivery Plan has identified a need for four secondary schools. The Local Plan has allocated five sites for secondary schools. Further work is being carried out regarding the spatial assessment needs for schools.</p> <p>Proposed wording for the gasholders:</p> <ul style="list-style-type: none"> • strongly encourage the retention, reuse and enhancement of the existing non-designated heritage asset, Gasholder No.1, which is located in the south west corner of the site, due to its local character and landmark merit. Retain and reuse parts of the dismantled gas holder no. 1 within the future development. <p>Bridges will significantly improve cross borough boundaries and access to various transport interchanges. The Housing Zone Team have looked in to options for delivering the bridge and will work with landowners and developers through the process.</p>

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								<p>not been justified, it will result in significant land take and there is an existing secondary school a short distance away at Langdon Park. Heritage The newly worded policy to strongly encourage the retention, re-use and enhancement of the nondesignated heritage asset, Gasholder No.1 needs to be amended acknowledging that the necessary consent is in place to demolish the three gasholders. It is understood that parts of the existing gasholders are likely to be kept in storage with the aim of reusing part them within the future development as a recognition of the site's industrial past. However,using part of them is a very different proposition in terms of viability than, if there is a requirement to retain an entire gasholder.</p> <p>Connectivity Finally, in regards to the need to provide land to facilitate the delivery of a footbridge over the River Lea, that whilst this may be desirable from a connectivity perspective it is not considered necessary to un-lock the development potential of this site. We also have logistical concerns in terms of how this bridge would be implemented given the land on the other side of the River Lea is owned by third party and is controlled by a different Local Planning Authority, namely the London Borough of Newham. Conclusions For this site allocation to meet the tests of soundness for the Local Plan it needs to be deliverable and as set out above, in their current form, the collective burdensome requirements and obligations presented in this allocation make the allocation potentially undeliverable. It is important that changes to Site Allocation 3.2: • Remove the requirement for a minimum amount of open space. • Remove the specific reference to the open space being located adjacent to the River Lea, with the text amended to reflect provision distributed across the site. Figure 36 should also be amended accordingly. • Incorporate some wording around the flexibility of the provision of family housing, to state that the maximum can be provided "where feasible". • Remove reference to the Secondary School. • Remove the requirement to encourage retention of Gasholder 1 to reflect the permission in place to dismantle the holder and reword to reflect that parts of the holders could be used in accordance with an approved heritage or pubic arts strategy. • Remove direct reference to a new bridge over the River Lea.</p>			

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1142186	Andrew Wood	Isle of Dogs NP Forum	LP138	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	No	Positively prepared			Vision for the Isle of Dogs “There will be additional local employment opportunities in South Poplar and Isle of Dogs to support a range of flexible start-ups and small-to-medium enterprises.” This is not supported by other policies outside of a small area. The Canary Wharf CAZ is not ideal space for many start-ups or SME’s. “11. Facilitate the provision of new neighbourhood centres at South Quay and London City Island, with ground floor active retail units along key routes, and support the convenience needs of the emerging community” approved planning applications now under construction at these two sites have minimal retail and could not be considered to be neighbourhood centres. In fact, the existing mini-shopping mall at South Quay is due to be demolished despite containing the only Tesco store in the Area designed for truck deliveries. “22.a new pier at Canary Wharf East.....”. there is a lack of clarity around where that should go and what its purpose it should serve. Enhancing open spaces and water spaces While the ‘greening of facades’ is welcome, there is no policy that provides any specific guidance and is inadequate given the density and scale of development. On page 220 the Local Plan says the OAPF area has to help deliver 30,601 homes but there is no analysis of how much green space those homes require, it just says green space required. Most relevant to Tower Hamlets are the Open space standards within the London Plan. The standards with the London Plan are similar in scale to the Accessible Natural Greenspace Standards developed by Natural England (the statutory authority for nature in England) which recommends that everyone, wherever they live, should have an accessible natural greenspace: of at least 2 hectares (4.94 acres) in size, no more than 300 metres (328 yards) (5 minutes’ walk) from home, with at least one accessible 20-hectare (49.4 acres) site within two kilometres (1.24 miles) of home, and one accessible 100-hectare (247 acres) site within five kilometres (3.1 miles) of home, and one accessible 500-hectare (1235.5 acres) site within ten kilometres (6.2 miles) of home, and a minimum of one hectare (2.47acres) of statutory Local Nature Reserves per thousand population. These standards are not statutory. They are, however, the most appropriate recommended standards for local authorities to use when preparing and revising their local plans. The Area is already failing these standards and will only worsen over time absent set targets included in the Local Plan. ‘Table 31: Supply vs Demand – Provision of Publicly Accessible Open Space’ in the Infrastructure Plan October 2017 (part of the evidence pack) shows that we have a deficit of 100 hectares of publicly accessible open space today. As the population increases the deficit will increase to 214 hectares by	Yes		Point 8 of the Isle of Dogs vision specifically makes reference to supporting SME's as outlined in the site allocation requirements. Canary Wharf is considered to be suitable to accommodate smaller businesses as set out in the Tower Hamlets 'Growth Sectors and SME workspace study'. It is not considered that there is minimal retail/town centre uses especially at City Island where the anchor of the ballet is located. The borough's Neighbourhood Centres are very diverse in terms of form, character and scale. While South Quay may not be a continuous parade, cumulatively there are/will be a number of units and its designation also reflects the need to service the growing population in the area. The new pier will serve as a new mode of transport - part of the London River Services as shown on the vision map for the sub-area. Policy D.ES3 relates to living buildings – we will consider providing specific guidance in a separate document. With regards to the scale and density of developments, the green facades do not have to cover the entire building but can cover the aspects that are considered appropriate. We propose to include information on the infographic to include how much open space the site allocations will deliver - e.g. it will state the number of hectares. Publicly accessible space is assessed against the open space standard devised from the Fields in Trust quantity guidelines for the provision of formal and informal outdoor space. The Fields in Trust guidance recommends the guidelines are adjusted to take account of local circumstances. The current local open space standard is 1.2 hectares (ha) per 1,000 residents. The local standard is a composite standard that takes into account all types of publicly accessible open space, including publicly accessible play space and space for outdoor sports. London Plan guidelines on ideal walking times to open spaces of particular sizes have been used to establish ‘catchment

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									2031. This is not sustainable. Greenwich Foot Tunnel - marked as part of National & London Cycle Network - it is currently illegal to actually cycle in the tunnel. There is, moreover, a conflict between incautious cyclists, and pedestrians that the LBTH should address in the Local Plan.			areas' for parks above 1ha, parks above 2ha and parks above 20ha in Tower Hamlets. With regards to the Greenwich foot tunnel, the route is part of the National and London Cycle Network. If it is illegal to cycle through it then cyclists will be obliged to dismount their bikes for that section.
1054534	Angelic Interiors Limited	Angelic Interiors Limited	LP225	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	Yes		AIL supports the vision for the Opportunity Area, as set out Section 5 of the draft plan.			Yes		Support welcomed.
1054236	EID Partners hip		LP178	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	N/A			Further to our comments made against the Regulation 18 consultation documents, connecting places is, in our view, a key objective for any local plan. We thoroughly support London Borough of Tower Hamlets' ambition in this regard. But for connections to be attractive and safe, they need to be animated and populated. In this regard, we note that Poplar High Street Neighbourhood Centre has been extended into the Blackwall Reach development to the west of the site and this has begun to connect Poplar and Blackwall, building activity along the spine running to the north of the A13 corridor. Given the barrier created by the A13 and to a lesser extent by the docks themselves, Poplar High Street is increasingly a critical linear link between the emerging employment hub "Republic" at East India Dock and the talent living and working along this route, providing a physical connection between the educational offer around Poplar DLR Station (and the direct link that this station will provide to Crossrail and Canary Wharf in time), the retail offer along Poplar High Street, and the amenity offer of Blackwall Reach and East India Dock around Blackwall and East India DLR station. We think that the				At this time, it is considered that the existing boundary of Poplar High Street is appropriate. Retail uses can be supported at East India Dock in line with its LEL designation, in order to support the function of the area. The boundary of the town centre can be further reviewed as part of any future Local Plan review. Even with extension, it is not considered that sufficient floorspace would be provided to justify designation as a District Centre. Regardless its designation as a District Centre is made through the London Plan.

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								importance of Poplar High Street as a key connector should be recognised and that Poplar High Street Neighbourhood Centre should be upgraded to a District Centre extending from Tower Hamlets College in the west to Republic and the lake at East India Dock in the East. It is our view that the opportunity created by Poplar High Street to create a substantive connection between Canary Wharf and Poplar and Blackwall is underplayed in the draft plan and that Poplar High Street is under performing as a centre. It is our view that Poplar High Street could benefit from a greater critical mass, increased identity and anchor uses if it is to become the hub of a creative village that effectively mixes those key elements identified earlier of 'work, live and play'.				

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624580	Jason Larkin	Canary Wharf Group Plc	LP542	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	No	Positively prepared; Effective			The 'Vision for Isle of Dogs and South Poplar' states that development will be "exemplar high quality". We have not found this requirement applied to any of the other sub-areas and would question why a higher standard is being applied to Canary Wharf. We are strong advocates of very high quality design as demonstrated through our developments at Canary Wharf and elsewhere in London. However, a requirement for exemplar development should only be applicable in exceptional circumstances which are clearly identified and justified. The word "exemplar" should therefore be removed from the Vision text. Given references elsewhere in the Draft Local Plan (draft policy S.SG1, para. 2.13 and para. 6.9) to Canary Wharf's re-designation as a Metropolitan Centre, the 'Vision for the Isle of Dogs and South Poplar' should also make reference to Canary Wharf having achieved re-designation to Metropolitan Centre status in the town centre hierarchy by 2031. Para. 5.6, point 2 refers to a transition in scale from surrounding areas. We would reiterate our comments made on the Draft Tall Buildings Zone above when considering the appropriate building height in Canary Wharf, especially on the North Quay site in light of the approved height of the implemented 2007 scheme, the location of the site within a Major Town Centre, the CAZ and an Opportunity Area as well as the site's very high accessibility levels. The appropriateness of the transition should be considered during Development Management process and reference to a transition within para. 5.6 should be deleted. Para. 5.6, point 9, 'Revitalising our Town Centres', is inconsistent with the position statement of LBTH confirming the view that Canary Wharf is already fulfilling the role of a Metropolitan Centre (paras. 2.13 and 6.9). It is therefore recommended to reword point 9 to read: "9. Endorse the re-designation of Canary Wharf to a Metropolitan Centre in the London Plan. Promote the expansion of retail, leisure, complementary commercial employment provision in Canary Wharf to support its continued role as a higher order town centre."			The Local Plan will be reviewed to look for grammatical errors and repetition. The boundary of Wood Wharf will be discussed at the examination in public. Consistency between diagrams have been checked and amended accordingly. Details of amendments can be seen in the minor modifications.
1049340	Ruth Bravery		LP832	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	No	Justified; Effective			I also believe the plan is not the best option nor will it result in sustainable development because LBTH have paid too little regard in their evidence base to the negative sustainable development issues that have already emerged in the last 12 months from the very poor quality development that is happening now on the Isle of Dogs especially. Specific examples of issues missing or inadequately addressed in the evidence base include: • High levels of public drug taking in and around new development at Millharbour because the public realm areas have been so badly designed. Where is the investment in this plan to redesign these public realm areas and make them safe for thousands			The Local Plan seeks to deliver good quality sustainable development and this is reflected in a number of policies such as policy S.SG2 which, amongst other things, requires good design. Policy S.DH1 also sets out various requirements that help ensure that a development is designed to a high quality. Policy D.DH2 addresses safety matters within the public realm through incorporating the principles of 'secured by design' to improve the safety and

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									<p>of residents newly moved in? • The fact that many residents on the Isle of Dogs already are facing unmanageably low pressure levels for water and gas in their homes, yet the plan takes a surprisingly relaxed approach of passing responsibility for addressing these issues to others, whilst overtly planning more development which will make the matter worse. • The fact that new large developments of private long lease flats are already facing detriment and decay because of unscrupulous private management agents and freeholders who fail to carry out maintenance, repairs or safety checks yet charge each leaseholder annual management charges which can be as much as £19,000 a year per flat. Most of the new residential development proposed will be of this kind, and based on current local experience, probably 50% of the new development yet to come on stream will be blighted by this problem. If LBTH fails to find an imaginative approach that reduces the chance of this happening, then it is merely setting out a plan for developing the slums of the future with the resultant homelessness falling on LBTH's shoulders. • The fact that large numbers of private lease residential towers have already been built which predate modern fire regulations and so are not suitable for "stay put" fire policy, yet there is no provision of long ladder fire appliances in the borough. • Inadequate plans for maintenance of the sea wall along the Thames - many flat leaseholders are staggered to learn that they are responsible for the huge cost of river wall maintenance as the sea wall forms part of their estate, and this will lead to repairs not being done by some developments. Flooding or closure of Thames Path will result if there is no provision in the plan to work with local leaseholders to manage the degrading sea wall. • The joint strategic needs assessment recognises on page 21 that there is an under-provision of green space in the borough and this affects health and life chances. Yet the proposes for additional green space are only set at a minimum level that is required for new development and no proposals are brought forward for addressing the existing shortage. • The transport strategy 2011 on page 7 shows the PTAL score is "poor" for the isle of dogs, but no plans are included which address or resolve this issue, despite many more homes being built in this area and therefore more people affected by poor connectivity. Overall, the plan put forward is the wrong plan out of the options available because it has been set in an evidence base that is too optimistic and not reflective of the unique issues already affecting the borough.</p>			<p>perception of safety for pedestrians. The act of anti-social behaviour itself not a matter addressed through the Local Plan.</p> <p>The Infrastructure Delivery Plan lists various projects that are proposed and states the funding/required funding source.</p> <p>Policy D.ES6 specifically addresses water usage and pressure and this will need to be demonstrated through the planning application process in consultation with Thames Water.</p> <p>The maintenance of buildings is not a matter addressed through the Local Plan. However, policy D.H2 seeks to maximise affordable housing so this will reduce costs significantly. The council does not have control over the cost of market housing.</p> <p>Fire and safety considerations are specifically addressed in sections 3 and 6 of the draft Local Plan. The Mayor of London is consulting on a series of fire safety standards as part of the consultation to the new London Plan in response to the Grenfell Tower fire. However, the London Plan is still at an early stage in its development and the recommendations of the public inquiry into the Grenfell Tower fire are still awaited.</p> <p>Nine of the site allocations require strategic open space (1 ha minimum) to be delivered on site, 4 of which are in the Isle of Dogs.</p> <p>Parts of the Isle of Dogs have a low PTAL score. This will be reflected in the types of development coming forward in the areas. The Council and TfL are working to improve DLR services and walking and cycling accessibility for the IoD.</p>

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1053788	Steve Craddock	The Canal & River Trust	LP376	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	N/A			We support the objective to “reinforce or complement the local historic distinctiveness to create a sense of place that responds positively to the waterways”. In our representations on policies S.OSW2 and D.OSW4, we have argued that Local Plan policies should clearly support proposals for on-water uses that will help to recapture some of the historic character of the docks as active waterspaces, without an undue focus on the protection of openness. We support the activation of dock edges, but we do not consider that high quality public realm will be delivered simply through promotion of a more active use of the land around the docks. We consider that particular care needs to be taken in the masterplanning for Mash Wall East and Marsh Wall West to ensure that development does not have an adverse impact on existing active uses of the waterspace, which would mean that it would be inconsistent with policy D.OSW4. The waterspace to the north of these sites are particularly important to the Trust as they provide the opportunity and potential to moor large ships within Docklands. These on-water uses bring life to the docks and attract visitors to the area. We welcome that the development guidance requires development to step back from the docksides. We suggest that the scale of development planned in Docklands will lead to a significant increase in the use of the docksides for walking and cycling. The quality of the surfacing will need to be improved, including the removal of trip hazards caused by the roots of trees, to accommodate the expected increase in pedestrian traffic. As suggested above, the Trust consider that this should be factored into the ‘green grid’ project of the Council’s Infrastructure Delivery Plan. We would welcome discussions with the Council about appropriate schemes that could be funded by CIL in this area. The approach to hard			Support noted. The impacts on waterspace are addressed in policy S.OWS2 which requires the integrity of the waterspace to be protected and promotes waterspaces for recreational and leisure uses. Policy D.OWS4 also seeks to protect waterspaces through ensuring that there are no adverse impacts on the network, uses and various other aspects. Details regarding the surfacing and landscaping will be addressed through the development management process. Policy D.MW3 requires developments to provide sufficient waste storage facilities and major developments to provide mass waste collection systems. The standards they are required to ensure that they are accessible. Comment noted regarding engagement for bridge proposals across the trust’s land. Comment noted regarding proposals being discussed at an early stage between the developer and the council.	

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								landscaping of the dock edges, as development sites come forward, should be consistent. Developments need to be planned to facilitate the convenient disposal of waste by residents so that they do not lead to a situation whereby it is more straightforward for them to dispose of rubbish in our dock-side bins. At various points the Local Plan, particularly in sections relating to Docklands, the Council sets out aspirations for new bridges across the Trust's waterspaces. The Council will be aware that new bridges are subject to the Trust's agreement and in some cases the agreement of the Secretary of State for Environment, Food and Rural Affairs. We would encourage the Council and developers to discuss these proposals with us at an early stage in the implementation of these schemes. Should you wish to discuss any of the points raised in this response then please contact me using the details below.				
1142590		British Airways plc	LP470	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	N/A			Isle of Dogs and South Poplar Sub Area 4 and Isle of Dogs Activity Area We fully support the following policies in relation to the site being identified as part of the Isle of Dogs and South Poplar Sub Area D and Isle of Dogs Activity Area: · Key Objective 2 which identifies the area of Isle of Dogs and South Poplar as one that should optimise regeneration opportunities to reduce existing spatial inequalities and barriers and prevent polarisation of areas or communities. · Policy S.SG1 (Areas of growth and opportunity within Tower Hamlets) states that the majority of new housing and employment provision within the borough will be focussed within the Isle of Dogs and South Poplar opportunity area. · Sub Area 4: Vision for Isle of Dogs and South Poplar to facilitate new homes and a cohesive mix of housing, employment and leisure uses. · Policy S.H1 (Meeting Housing needs): part a. the majority of new housing will be focused in opportunity areas.			Applications will be assessed against relevant policies and considered on their merits. If an application can demonstrate that it can optimise the site and meet the policy requirements then it will generally be considered acceptable.	

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1142590		British Airways plc	LP474	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar				The existing site forms part of the South Quay Masterplan, as detailed in the South Quay Masterplan Supplementary Planning Document (SPD). Planning permission (reference PA/14/00939) was gained in March 2015 for: "Demolition of all existing buildings and structures on the site (except for the building known as South Quay Plaza 3) and erection of two residential-led mixed use buildings of up to 68 storeys and up to 36 storeys comprising up to 888 residential (Class C3) units in total, retail (Class A1-A4) space and crèche (Class D1) space together with basement, ancillary residential facilities, access, servicing, car parking, cycle storage, plant, open space and landscaping, plus alterations to the retained office building (South Quay Plaza 3) to provide retail (Class A1-A4) space at ground floor level, an altered ramp to basement level and a building of up to 6 storeys to the north of South Quay Plaza 3 to provide retail (Class A1-A4) space and office (Class B1) space." As detailed above, South Quay Plaza 3 was largely excluded from this planning permission and currently consists of a commercial building of fifteen storeys providing office floorspace (Use Class B1) on upper floors and a podium at ground floor. British Airways Pension Trustees Limited's vision for the site involves maximising its central location within Canary Wharf. Our client seeks to achieve this through ensuring flexibility for the site moving forward, thus allowing future proposals to be able to reflect changing demand. Our client recognises that the existing building will expire at a point during the proposed Plan's period and therefore wish to ensure the emerging planning framework will enable the optimisation of its redevelopment. These written representations are made to ensure that both an appropriate scale is sought for the site whilst enabling flexibility regarding potential land use in order				Applications will be assessed against relevant policies and considered on their merits. If an application can demonstrate that it can optimise the site and meet the policy requirements then it will generally be considered acceptable.

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								to respond to market conditions that may emerge. The majority of the South Quay Masterplan has been split into two site specific allocations in the emerging Local Plan: · Marsh Wall East (4.5) · Marsh Wall West (4.6) Both of the above sites have been allocated for housing and employment land uses with infrastructure requirements for 0.4 hectares of open space, a primary school and a health centre. Contrary to the neighbouring sites, our client's site has not been allocated within either of these allocations and is therefore unallocated. However, the site does fall within some policy specific allocations, which are discussed where relevant in detail below. Policy allocations South Quay Plaza 3 ('the site') has the following designated policy allocations: · Isle of Dogs and South Poplar Sub Area D · Isle of Dogs Neighbouring Planning Forum · Isle of Dogs Activity Area · South Quay Neighbourhood Centre · Strategically Important Skyline: Canary Wharf Area (Major Centre) We discuss where relevant the aforementioned site allocations in further detail below.				
635797	Greater London Authority		LP695	PART 4: DELIVERING SUSTAINABLE PLACES, Chapter 5: Sub-area 4: Isle of Dogs and South Poplar	N/A			The Isle of Dogs is a key employment, housing and growth area, not only for Tower Hamlets but for London. Employment As part of the OAPF my officers have undertaken an employment capacity study which has been shared with Tower Hamlets. This recommends securing minimum employment floorspace on sites within a 'CAZ B equivalent' location in order to achieve the London Plan employment targets. Site Allocation As set out in my previous letter, and comments from TfL, it is recommended combining North Quay, Aspen Way and Billingsgate site allocations to secure the links across Aspen Way. There are currently inconsistencies in locations of linkages between these sites, and this needs to be coordinated across site allocations. OAPF My officers			<p>No change proposed regarding merging the site allocations. The sites have very different characteristics and detailed principles are required to ensure that the individual development plots are brought forward in a co-ordinated manner and address their respective site specific issues. In addition the sites have different delivery dates, so the development may not come forward comprehensively. They also have different landowners.</p> <p>In addition, keeping the site separate makes it clearer to developers in terms of what requirements need to be met within their site.</p> <p>The locations of linkages will be reviewed and appropriate amendments will be made. Details of amendments are provided under individual site allocations.</p>	

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								have worked with officers at Tower Hamlets to develop the placemaking strategy for the OAPF which includes locations of proposed new parks and routes. The design component of the site allocations work should be coordinated with this to provide consistency across the two plans.				With regards to the OAPF, it has to be consistent with the Local Plan.
829908	Andrew Wood		LP62	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 38 :Vision for Isle of Dogs and South Poplar	No	Effective			Maps do not reflect three different crossings being consulted on by TfL for new Rotherhithe crossing Location of Canary Wharf East new river bus pier does not match TfL plans Major transport routes are unclear like Eastferry road, Limeharbour - many residents have asked what happened to these roads	Yes		The crossing are still at the feasibility stage so will not be included . The plans are indicative so do not show the exact location of the potential pier. 3. The size of the map and the designation on roads such as Westferry and Limeharbour is such that it will be difficult to see.
624580	Jason Larkin	Canary Wharf Group Plc	LP543	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 38 :Vision for Isle of Dogs and South Poplar	No	Positively prepared; Effective			Figure 38: 'Vision for Isle of Dogs and South Poplar' shows the 'London Cycle Network' as an "existing feature" passing along the southern part of the North Quay site. The North Quay site is currently inaccessible to the public and we are not aware of any cycle route passing through the site. This feature should therefore be removed from Figure 38 as it relates to the North Quay site. Figure 38 also shows a dashed orange line running through the middle of the North Quay site, however there is no corresponding reference in the Key to what this line represents. Confirmation is needed on this			The extent of the spatial designations on the diagrams/figures is indicative and shown for illustrative purposes only. Detailed boundaries are shown on the Policies Map. Support is welcomed on the Med City designation. However, the Green Spine forms a central element of the Whitechapel masterplan proposals. It will be delivered through a range of mechanisms, including the use of financial contributions. Comment noted. The supporting text (paragraph 8.18) will be amended to confirm that the Green Sprint will provide a pedestrian link between Whitechapel Road and Commercial Road, from the town centre to a new civic square at the site of St Andrews Church.
1134361	Patrick Wallace		LP1	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 38 :Vision for Isle of Dogs and South Poplar	No	Positively prepared			The key to the different coloured sections appears to be incomplete, specifically those in darker shades of pink which appear to relate to sites currently under development, but this is not explained.			The colours on the map will be reviewed to ensure that the designations are clear.

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1142985	Transport for London (TfL)	Transport For London	LP747	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 38 :Vision for Isle of Dogs and South Poplar	N/A			▪ This figure, and the key in particular is not clear, with some errors and omissions.				Proposed changes: The location of the south dock bridges will be shown The colour of the cycle superhighway will be reviewed and amended accordingly The location of the proposed pier at Greenwich Peninsula will be shown. Comments noted regarding showing more detail, however, the vision map is a high level map that does not go into the finer details of public real schemes etc.
1142985	Transport for London (TfL)	Transport For London	LP748	PART 4: DELIVERING SUSTAINABLE PLACES, 5.5 Paragraph	N/A			▪ Icons are not clear or legible				It is proposed to amend the images to ensure that they are clear.
1049487		Ashbourne Beech Property	LP109	PART 4: DELIVERING SUSTAINABLE PLACES, 5.5 Paragraph	No	Justified			At p220, paragraph 5.5 the development potential of the Isle of Dogs and South Poplar is identified, including a need for a minimum of 30,601 residential units, for two secondary schools, eight primary schools and two community local presence facilities. Development in the area is, amongst others, to strengthen the role and function of Crossharbour as a district centre by creating a high-street environment along Pepper Street. Food and leisure is to be focused around Glengall Bridge whilst community uses are to go in the heart of the town centre (paragraph 10, p221). Can the heart of the centre be defined? What is the boundary of the centre? Figure 38, 39 and 42 include a different boundary to that set out in the Retail Study 2016 (Appendix 13), whilst the Policies Map is not clear.	Yes		The exact location of the town centre can be seen on the policies map. The site allocations maps are for illustrative purposes.
1053788	Steve Craddock	The Canal & River Trust	LP392	PART 4: DELIVERING SUSTAINABLE PLACES, 5.6 Paragraph	No	Justified; Effective			We suggest that point 16 of the objectives for the Isle of Dogs and South Poplar should be amended as follows (proposed additions and deletions): Facilitate the delivery of useable, high quality new and improved publicly accessible open space that is well integrated into the green grid network. The Council will work with the landowner to bring forward a viable scheme for improved open space on part of the insert <The Council will work with the landowner to bring forward a viable scheme for improved open space on part of the> delete<, including a new park at> Millwall Slipway. Reason: To ensure that the proposal is deliverable.			Agreed. It is proposed that the wording for the Isle of Dogs design principles be amended as follows: Facilitate the delivery of useable, high quality new and improved publicly accessible open space that is well integrated into the green grid network, including a new park at Millwall Slipway including improvements to Millwall Outer Dock Slipway to increase the usability of this existing open space.
1142985	Transport for London (TfL)	Transport For London	LP749	PART 4: DELIVERING SUSTAINABLE PLACES, 5.6	N/A			▪ Where it states "Ensure a continuous and vibrant riverside walkway along the Thames Path" can we please suggest that this is re-worded to include the word 'public'				Agreed. It is proposed to amend the wording to ensure that the riverside is publicly accessible: Ensure a continuous and vibrant publicly

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				Paragraph				to ensure that public space along the Thames is not privatised or access restricted to certain hours.				accessible riverside walkway along the Thames Path, linking Greenwich to the River Lea Park.
1142985	Transport for London (TfL)	Transport For London	LP750	PART 4: DELIVERING SUSTAINABLE PLACES, 5.6 Paragraph	N/A			▪ 'Create a series of smaller open spaces, particularly around South Quay station'. Clarification over the reasoning for this would be welcomed. Why particularly the station, as opposed to the wider area?				The focus on open spaces around South Quay station is reflected from the South Quay Masterplan.
1142548	Grafton Group PLC	Grafton Group PLC	LP423	PART 4: DELIVERING SUSTAINABLE PLACES, 5.6 Paragraph	No			We are generally supportive of the proposed Local Plan, however, we have identified a number of specific policies whereby we consider changes are necessary to ensure the soundness of the policy in accordance with the requirements of the NPPF and NPPG. We reserve the right to appear at the future Examination in Public in relation to the Local Plan and to comment on the matters raised in these representations and on all other aspects of the emerging Local Plan once the Submission Version has been published. We also reserve the right to comment further on the associated evidence base and other background documents relied upon in the preparation of the Local Plan; particularly having regard to the forthcoming draft London Plan.	ALSO COPIED TO TRANSPORT SECTION Thank you for providing us with the opportunity to comment on Tower Hamlets Local Plan Regulation 19 consultation. These representations are submitted on behalf of both Grafton Group PLC and Regal London. Our response primarily relates to our interest in the Orchard Wharf site which is located in the Leamouth character place in the Isle of Dogs and South Poplar sub area. The site is located with the Isle of Dogs and South Poplar Opportunity Area and the Poplar Housing Zone. It comprises an area of approximately 1.36 hectares and was formerly an aggregates wharf last operated by St Albans Sand and Gravel. The aggregates operation commenced in the early 1960's but ceased in 1993. The site has stood vacant since then. Since this time it has had a chequered planning history including a failed CPO attempt by the PLA. Grafton Group PLC owns the Orchard Wharf site, and working with its development partner Regal London, there is an aspiration to secure planning permission for the mixed-use redevelopment of the site that would incorporate waterborne freight related uses in accordance with the site's safeguarded wharf status. It is within this context that we comment on the following aspects of the Local Plan below. In preparing these representations we have had regard to the need for consistency with strategic policies in the London Plan. We are in ongoing discussions with the GLA, PLA and LBTH over the future of Orchard Wharf. We remain of the longstanding view that the safeguarding of Orchard Wharf should be released and this is something we will continue to promote through the forthcoming London Plan review. Clearly if the safeguarding is released then there is an opportunity to bring forward a very different form of redevelopment on the site and the Local Plan review affords opportunity to respond to this. However, without prejudice on this position the following representations are based on the assumption that the safeguarding remains. We do however reserve our right to adopt a different position in response to any changes in strategic planning policies within the draft London plan that is due for publication on 29th			So long as the safeguarding designation stands, policy will aim to protect these sites from development in accordance with the London Plan. A London-wide review of safeguarded wharves has been commissioned, and the report will be published as part of the London Plan Review.

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									November 2017.			
1142548	Grafton Group PLC	Grafton Group PLC	LP457	PART 4: DELIVERING SUSTAINAB LE PLACES, 5.6 Paragraph	No				We are supportive of the overall Vision for the Isle of Dogs and South Poplar. We also support the overall development potential targets / uses for the area that are outlined at Paragraph 5.5 and the associated unreferenced diagram. We are broadly supportive of the development requirements (Numbered 1 – 22) outlined at paragraph 5.6. In the context of the current London Plan we support requirement 21 which supports the reuse of Orchard Wharf to facilitate freight services. This accords with the requirement of the London Plan for the safeguarded wharf to be used specifically for waterborne freight related uses. As outlined above in respect of Policy D.TR4 we believe reference should be made to the potential for the reactivation of the safeguarded wharf to be facilitated by appropriate forms of mixed use development that do not impact detrimentally on its ability to function for waterborne freight uses.			The current wording is considered to be sufficient to address the principle of reactivating the wharf.
1033284	Unknow n	One Housing Group	LP420	PART 4: DELIVERING SUSTAINAB LE PLACES, 5.6 Paragraph	No	Effect ive			viii) Isle of Dogs and South Poplar One Housing considers that the development principles for the Isle of Dogs and South Poplar sub-area set out on Page 220 of the Local Plan should be supplemented with additional principles that recognise: § - Subject to thorough and inclusive public consultation, the potential of the area for housing estate regeneration schemes to deliver homes which meet housing need and provide improved social facilities and environmental amenity; and, § - The potential of the area to accommodate growth as defined in the Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF), once adopted. One Housing is in the early stages of considering, with residents, how its four estates on the Isle of Dogs could help people to live better. However, given their prominence within the Opportunity Area, flexibility should be provided to allow the estates to potentially play an important role in terms of improved and additional housing (including affordable housing) and strategic infrastructure. If progressed, this could bring significant benefit both to the estates and to the wider area and the Local Plan should positively prepare for such an eventuality. These additional principles are therefore considered to be fundamental to help ensure that growth in the Isle of Dogs is planned comprehensively. Our representations on tall buildings and density above do not pre-judge the outcomes of consultation and future investment in the estates may not involve such typologies. However, given the need for the plan to be effective (i.e. deliverable), it is our view that it should offer sufficient flexibility to allow for appropriate development without the need for a further plan review. This is especially important given the overriding need for new homes which will continue to	Yes		Matters regarding extensive public consultation are addressed in part 6 of policy D.H2. There is nothing in the plan that prevents estates playing an important role in providing improved and additional housing. Part 5 of policy D.H2 sets out the important role estates are required to play.

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									be a key issue in the Borough for the foreseeable future.			
1142556	Regal London	Regal London	LP460	PART 4: DELIVERING SUSTAINABLE PLACES, 5.6 Paragraph	No			We are generally supportive of the proposed Local Plan, however, we have identified a number of specific policies whereby we consider changes are necessary to ensure the soundness of the policy in accordance with the requirements of the NPPF and NPPG. We reserve the right to appear at the future Examination in Public in relation to the Local Plan and to comment on the matters raised in these representations and on all other aspects of the emerging Local Plan once the Submission Version has been published. We also reserve the right to comment further on the associated evidence base and other background documents relied upon in the preparation of the Local Plan; particularly having regard to the forthcoming draft London Plan.	ALSO COPIED TO TRANSPORT SECTION Thank you for providing us with the opportunity to comment on Tower Hamlets Local Plan Regulation 19 consultation. These representations are submitted on behalf of both Grafton Group PLC and Regal London. Our response primarily relates to our interest in the Orchard Wharf site which is located in the Leamouth character place in the Isle of Dogs and South Poplar sub area. The site is located with the Isle of Dogs and South Poplar Opportunity Area and the Poplar Housing Zone. It comprises an area of approximately 1.36 hectares and was formerly an aggregates wharf last operated by St Albans Sand and Gravel. The aggregates operation commenced in the early 1960's but ceased in 1993. The site has stood vacant since then. Since this time it has had a chequered planning history including a failed CPO attempt by the PLA. Grafton Group PLC owns the Orchard Wharf site, and working with its development partner Regal London, there is an aspiration to secure planning permission for the mixed-use redevelopment of the site that would incorporate waterborne freight related uses in accordance with the site's safeguarded wharf status. It is within this context that we comment on the following aspects of the Local Plan below. In preparing these representations we have had regard to the need for consistency with strategic policies in the London Plan. We are in ongoing discussions with the GLA, PLA and LBTH over the future of Orchard Wharf. We remain of the longstanding view that the safeguarding of Orchard Wharf should be released and this is something we will continue to promote through the forthcoming London Plan review. Clearly if the safeguarding is released then there is an opportunity to bring forward a very different form of redevelopment on the site and the Local Plan review affords opportunity to respond to this. However, without prejudice on this position the following representations are based on the assumption that the safeguarding remains. We do however reserve our right to adopt a different position in response to any changes in strategic planning policies within the draft London plan that is due for publication on 29th November 2017.			So long at the safeguarding designation stands, policy will aim to protect these sites from development in accordance with the London Plan. A London-wide review of safeguarded wharves has been commissioned, and the report will be published as part of the New London Plan.

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1142556	Regal London	Regal London	LP458	PART 4: DELIVERING SUSTAINAB LE PLACES, 5.6 Paragraph	No				We are supportive of the overall Vision for the Isle of Dogs and South Poplar. We also support the overall development potential targets / uses for the area that are outlined at Paragraph 5.5 and the associated unreferenced diagram. We are broadly supportive of the development requirements (Numbered 1 – 22) outlined at paragraph 5.6. In the context of the current London Plan we support requirement 21 which supports the reuse of Orchard Wharf to facilitate freight services. This accords with the requirement of the London Plan for the safeguarded wharf to be used specifically for waterborne freight related uses. As outlined above in respect of Policy D.TR4 we believe reference should be made to the potential for the reactivation of the safeguarded wharf to be facilitated by appropriate forms of mixed use development that do not impact detrimentally on its ability to function for waterborne freight uses.			The current wording is considered to be sufficient to address the principle of reactivating the wharf.
1134361	Patrick Wallace		LP2	PART 4: DELIVERING SUSTAINAB LE PLACES, 5.8 Paragraph	No	Positi vely prepa red			No reference to the ASDA development site and the future of the existing Island Health Centre. Perhaps this document is not the place for a detailed planning brief, but it would be inconsistent with all that is said in Chapters 3 and 7, as well as here, in relation to provision of adequate health facilities, if it were not made absolutely clear that redevelopment taking in the site of the present Island Health Centre must provide at least equivalent facilities BEFORE any redevelopment of the existing site, and that any profit from the redevelopment is returned to the benefit of the local community rather than individuals concerned in the management of the existing building and site.			The site allocation requires the health centre. In addition, the community facilities policies also protect health facilities. Any future development will need to ensure that the health centre remains within the site allocation. Matters regarding profit are not addressed through the Local Plan.

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624910	Sir or Madam	Telford Homes PLC	LP283	PART 4: DELIVERING SUSTAINAB LE PLACES, 5.8 Paragraph	No				Empson Street (Towcester Road) The draft Local Plan and Policies Map continue to designate this area as part of the Strategic Industrial Location (SIL). Additionally, Clifford House, Towcester Road continues to be designated as a 'site or area suitable for waste management'. Telford Homes considers the continued designations of these sites for SIL and a site/area suitable for waste management area at odds with the Poplar Riverside Housing Zone allocation by the GLA. The Housing Zone allocation is expected to deliver over 6,400 new homes and it is considered the proposed site allocations in this instance would severely restrict the potential delivery of the new homes required by the GLA allocation. In addition, given the site's restrictions in terms of transport accessibility and surrounding residential (existing and emerging), it is considered these designations are no longer appropriate in this location. It is considered there is a lack of evidence base to support the requirement of the new site allocation for waste management and therefore fails to accord with the requirements of the NPPF, which requires that the 'Local Plan is based on adequate, up-to-date and relevant evidence...' (paragraph 158). Telford Homes therefore recommends that the Council reconsiders these designations, and would suggest that a mixed-use allocation would be more appropriate and in accordance with the Housing Zone allocation. Summary Whilst Telford Homes are generally supportive of the draft Local Plan, there are a number of policies, site allocations and designations which require further deliberation. Further consideration should also be given to site-specific policies and designations relating to Chrisp Street Market and Empson Street as detailed above. Given the evidence base provided by Telford Homes, the Council is requested to reconsider the draft policies, particularly those relating to town centres and their future retail capacity.			SILs are a GLA designation. London Plan policy 5.17 requires waste sites to be safeguarded and also recognises that SILs will contribute to providing waste facilities. In addition, local planning authorities are required to identify. In terms of access and transport, the site is situated close to the A12 which is a strategic route. The sites SIL designation and the appropriate uses are set out in policy S.EMP1.

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1142716	Lyca Group		LP640	PART 4: DELIVERING SUSTAINAB LE PLACES, Figure 39 :Isle of Dogs and South Poplar site allocations	N/A		<p>We write on behalf of Lyca Group who own a 3.46 acre site in the South Quay area of London's Docklands, referred to as Thames Quay. This site falls within, and is located at the western end of, the Site Allocation 4.5 Marsh Wall East set out on Pages 182 & 183 of the draft Local Plan. Lyca Group have engaged in each of the preceding rounds of public consultation and look forward to continuing to develop an appropriate framework to create the certainty of outcome required to enable this pivotal site to be brought forward for development with confidence. The Thames Quay estate was constructed in the late 1980s and comprises Independent House, the ISIS Building, the Walbrook Building and 197 Marsh Wall. These buildings are currently let to a variety of occupiers. An increasing proportion of the estate is falling vacant and at 30 years old, the buildings are increasingly obsolescent. As such, Lyca Group are currently exploring options to optimise the site to deliver a mixed use scheme. In this context, we would suggest that the policies of the emerging plan and allocation are adjusted to incorporate the following amendments discussed below.</p> <p>Allocations We note that the site lies within the 'place' of Canary Wharf – one of 24 'places' that have been identified around the Borough. The site also lies within: · Isle of Dogs and South Poplar Sub Area Opportunity Area · Tower Hamlets Activity Areas: Isle of Dogs Activity Area · Skyline of Strategic Importance · Canary Wharf Cluster · Tall building zone – Canary Wharf (Isle of Dogs) · Archaeological Priority Area: Isle of Dogs Notably, the site sits outside of a Preferred Office Location and outside 'Canary Wharf' from a policy perspective. Lyca Group's vision for Thames Quay Lyca Group's vision is to redevelop the Thames Quay estate as a hub at the heart of both Marsh Wall and the Isle of Dogs and to optimise the site for a flexible mix of uses including elements drawn from, but not limited</p>				<p>The boundary has not been totally defined as the developments are in the process of being constructed. However, if an application comes forward with retail/neighbourhood centre uses outside of the town centre, they will be acceptable in principle providing other policy requirements are met. The western part of the allocation (Marsh Wall East) is made up of a number of development plots and so it is not possible to determine the exact nature and extent of the uses within this area at this stage. We have defined town centre boundaries (including key frontages) based on a clear delineation of uses and functions, as advised within paragraph 23 of the NPPF. Town centre boundaries will be kept under review through regular monitoring as set out in section 5 of the plan.</p>

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								<p>to, residential, commercial, hotel, serviced apartments, Build To Rent, and Leisure (restaurant/gym). Lyca Group are committed to bringing forward a new 'place' at Thames Quay which will become a thriving and integrated part of the wider place of Canary Wharf, and make a positive contribution to Tower Hamlets both in terms of delivering active uses as well as through the provision of well designed buildings to form part of the future of the Canary Wharf cluster.</p> <p>Representations to Regulation 18 Consultation Savills submitted representations on behalf of Lyca Group to the Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits: Regulation 18 Consultation November 2016.</p> <p>These representations noted that the Site Allocation for Marsh Wall East acknowledged that the site already included an element of retail use, and we suggested that given the western part of the allocation sits adjacent to the exit from South Quay DLR station, the neighbourhood centre should be extended to include the western part of the site allocation. This would help to animate both sides of the cut running along the west side of the site in line with the policy ambition to animate the dock edges as set out in the design principles section. Under the updated Site Allocation 4.5 Marsh Wall East in the Regulation 19 consultation we note the Borough's ambition to better connect the site into its hinterland through the proposal for a bridge connection from the west of the site allocation over Millwall Cutting, and the extension of the Green grid, strategic and local pedestrian and cycling route along Marsh Wall to the west of the site allocation. As an increasingly well connected site, we reiterate our previous suggestion that the South Quay Neighbourhood Centre should be extended to include the western part of the site allocation. We also noted in our representations to the Regulation 18 Consultation that the</p>				

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								western and eastern parts of the site allocation have different urban contexts and that this should be reflected in the townscape advice set out in the design principles section of the allocation which should acknowledge the predominantly high rise context of the western part of the site. We also supported the proposed mix of uses including both residential and commercial elements. We offer our comments on the Regulation 19 consultation below. We would be happy to meet with LBTH to discuss Lyca Group's aspirations for the redevelopment of the site to ensure that the plan can help enable rather than delay development coming forward.				
1130948	Adam Price	Transport for London	LP291	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	No				Sub Area 4: Isle of Dogs and South Poplar Aspen Way (4.1 Aspen Way) As you are aware the Aspen Way site allocation, as it was shown under the previous (Regulation 18) version of the Local Plan, forms a TFL landholding and was included as a site allocation following its submission by TfL CD under the earlier 'Call for Sites' exercise. We welcome the continued inclusion of this site in the Local Plan, which undoubtedly has the potential to make a significant contribution to housing delivery in the borough, as well as unlock the site for important strategic urban design benefits, not least in enabling the Isle of Dogs to be better connected with Poplar and the remainder of the borough. Crucially, housing development on this site would enable improvements to DLR operations and therefore service provision. However, we note that under the latest (Regulation 19) version of the Plan, that this site has now been amalgamated with the neighbouring Tower Hamlets College site, which was not previously subject to a site allocation. While we welcome the principle of the college site being included as a site allocation, and have no in principle objection to its redevelopment, it is critical that the DLR depot (i.e. the original site allocation) can be redeveloped independently from delivery of the Tower Hamlets College site, and vice versa, particularly as the site allocation now has a requirement for the re-provision of a college, community centre and football pitches. These requirements are entirely linked to the college part of the site and this must be clarified in order to avoid any ambiguity and potentially impacting on the viability of any development of the DLR station/depot site. On this note, we also make it absolutely clear that the operational DLR station, depot and ancillary functions			<p>Sites that have a number of landowners may require effectively engagement to facilitate potential land assembly and comprehensive redevelopment. Discussions regarding phasing would be addressed through the development management process.</p> <p>It is noted that the football pitches and community centre are not associated with the depot, however if the site is redeveloped comprehensively then the location of the infrastructure requirements may change.</p> <p>The delivery considerations note that the development should enable the continued use of the depot.</p> <p>The plans will state that they are for illustrative purposes. The existing and proposed bridges will be shown.</p> <p>Comment noted that the delivery of the bridge is dependent on the development of Billingsgate site allocation however it is not considered necessary to include this in the wording of the site allocation</p> <p>Matters regarding family housing will be discussed further at the examination in public.</p> <p>As evidenced in the Open Space Strategy (2017-2027) the borough currently has an</p>

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								<p>must be retained in this location as part of any site redevelopment. Open Space The revised Aspen Way site allocation now includes a specific quantum of open space (1ha), with a precise location for this highlighted in green on Figure 40. While we acknowledge that some open space would be required as part of any redevelopment, the precise size and locations of this will be dependent on the scale, design and density of any scheme that comes forward on this complex site. The location of the open space, shown in the accompanying site allocation diagram, is not feasible for open space provision. It would have to be located on a deck above the retained DLR depot. This would clearly be undeliverable as it would be an unsuitable location for the provision of a large area of open space, particularly in terms of layout, engineering, drainage and planting. It would also affect the viability of the scheme as a whole and therefore jeopardise delivery of the transport infrastructure improvements, housing (including a large proportion of affordable housing), connectivity and other urban design benefits. As such, this should either be removed from the diagram or placed elsewhere in a more feasible location within the site allocation (i.e. where it could be provided at ground level) and clearly annotated as 'indicative'. In reality, the open space provided as part of any redeveloped site is likely to be formed of a number of parcels of land, rather than one large open space. In addition, green colouring has been used to indicate the location of open space which is inappropriate and lacks flexibility. This suggests that any open space that comes forward will be in the form of green open space. It should be made clear that the actual open space proposed may be formed partly or wholly of hard and/or soft landscaping. Bridges The same applies for the bridge crossings identified on Figure 40. While we welcome the fact that a single decked structure has not been considered appropriate to link the site with its surroundings, the precise number and location of bridge crossings will form part of the wider design development of the site and the locations and numbers shown may prove to be inefficient, unfeasible, unviable or otherwise inappropriate following further investigations and analysis. These should be clearly shown as being indicative. If indicative bridges must be shown within the diagram these should be formed of hatched lines and include a more western crossing, although again annotated as wholly indicative. We acknowledge that the bridges have also been indicated on the Billingsgate site allocation, which sits to the direct south of the Aspen Way site allocation. However, it should be made clear within the supporting text that these potential bridge connections can only be delivered if the</p>			<p>open space deficiency and based on population growth projections this will continue to grow if the current amount of open space in the borough remains unchanged.</p> <p>In order to mitigate this deficiency and provide closer access to open space, the strategy identifies specific sites to establish new strategic open space, strategic open space is classified as 1ha and above. The strategy identifies the site as being within the Canary Wharf ward which has a high deficiency projection in 2031. Aspen Way is specifically identified in the strategy to provide a park and active recreation space for a significant new community on a site with strong lines of severance. We consider that this strategy clearly identifies the requirement for a minimum 1ha of open space to meet the borough and local deficiency both currently and as a result of future population projections. Therefore, we consider that there is justified evidence supporting the requirement of 1ha of open space on the site in the Local Plan.</p>

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									redevelopment of the Billingsgate site comes forward and this site will also need to contribute to these in part as it will not be viable for TfL to bring these connections forward in isolation. Housing provision It is considered that the design principle which requires development to “maximise the provision of family homes” is inappropriate for this area by reason of its location and the immediate context. The area is very urban in nature and located next to a major employment area, DLR operational infrastructure and the busy Aspen Way. Therefore, we would suggest that the wording of this design principle should be amended to read: “provide for some family homes”, which would be more appropriate for the site. Without the suggested changes, we consider the Plan to be unsound.			
790873	Sport England	Sport England	LP871	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	No	Positively prepared; Effective; Consistent with national policy			Sport England would like to highlight that the Aspen Way designation does include sports facilities. The policy does state “Community centre and associated football pitches (re-provision)” will be required. Given the deficiencies in existing provision and no robust sporting strategies indicating otherwise, Sport England would object to the loss of any facilities that are not replaced with a facility of at least equivalent quantity, quality and accessibility. It is recommended that a requirement to this effect is added to this policy.	Yes		The land use requirements already state that the pitches should be re-provided. In addition, policy D.CF2 seeks to retain community facilities and where the facilities are re-provided the quality and accessibility should be enhanced. This is considered sufficient.
1142559	Tim Brennan	Historic England	LP455	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	N/A			We recommend that the first sentence of the first bullet point of the design principles be amended to include at the end ‘....surrounding built environment including the adjacent St Matthias’ Church conservation area’.				It is proposed to amend the first sentence of the first bullet point of the design principles to: • respond positively to the existing character, scale, height, massing and urban grain of the surrounding built environment, including the St. Matthias Church conservation area. The setting of adjacent housing should also be protected through appropriate screening and landscaping;
1142985	Transport for London (TfL)	Transport For London	LP706	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	N/A			TfL welcomes further discussion about the extent of the Aspen Way site allocation, as well as ensuring that most importantly the continuing operation of the DLR depot is safeguarded through any development process, as well as its other land interests. The site allocation needs to look to achieve good growth in the London Plan through being able to create a high density, mixed use place that makes the best use of the land adjacent to a transport hub as well deliver critical				Scale and design are broadly addressed in the design principles, but the finer detail will be addressed through the development management process.

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							north – south connectivity, stitching together the northern part of the Isle of Dogs and Poplar.				
1142985	Transport for London (TfL)	Transport For London	LP751	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	N/A		<p>▪ This site allocation currently fails in looking to achieve good growth in the London Plan. That is through creating a high density, mixed use place that makes the best use of the land adjacent to a transport hub as well as sustainable & liveable neighbourhood which delivers critical north – south connectivity across the northern part of the Isle of Dogs and Poplar. It also fails to capture the real opportunity of this site which is to create new and much needed connections across Aspen Way and provide a new eastern entrance to Poplar station. This should be in the infrastructure requirements section as otherwise this could limit the viability or likelihood of delivering these links as well as other requirements. ▪ In line with TfL/GLA's previous comments, the site allocation also fails to recognise the sheer complexity of bringing forward a site such as the DLR depot. It also still critically fails to recognise the need to retain the DLR depot in situ, given its strategic importance for operation and maintenance of the network. ▪ In the Design Principles section the connections across Aspen Way are referred to but the text lacks the bite needed to ensure that they are delivered. If the allocation has been written in this way for deliverability i.e. The bridges may rely on the Billingsgate site coming forward and the Council may wish to ensure that this site still provides planning gain should the bridges not come forward for any reason, the Council should consider reviewing the wording to something similar to the wording used in the Marsh Wall allocation to suggest that the obligation would be reviewed if the main element were no longer required.</p>			<p>It is considered that the plan demonstrates good growth. While the site is not within a Tall Building Zone, policy D.DH6 addresses tall buildings proposed outside of the zone.</p> <p>Connections are addressed in the design principles.</p> <p>Acknowledgement has been given to the fact that the depot should remain in use and the finer details of this will be discussed as part of the planning application process.</p> <p>It is not considered appropriate or necessary to include bridges in the infrastructure requirements as the any development will only be expected to provide the land or enable the delivery of the bridge.</p>	

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1142184		East End Community Foundation	LP169	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	No	Justified			Whilst we welcome the site allocation and are generally supportive of its principles, we consider that further information is required with regards to the Council's objectives in this respect. The area in question clearly has the potential to deliver a significant quantum of residential and employment floorspace. It is important that discussions take place between landowners and the Council regarding the provision of the infrastructure and land use requirements, particularly given the extent of the site allocation. It is paramount that the design principles do not unduly restrict the development potential of the various parcels of land within the allocation, which should look to deliver high-quality schemes which optimise the delivery of residential accommodation, including through the provision of tall buildings. Whilst we agree that development should respond positively to the existing character scale, height, massing and urban grain of the surrounding built environment, it is important that the context of the wider townscape is also referenced, particularly that to the south, and this should be reflected in the design principles.	Yes		The design principles are considered to be appropriate for the setting and aspirations of the site and are not restrictive. It is not considered necessary to mention the wider townscape beyond what is mentioned in the design principles. Applicants can refer to the wider townscape in their submission if they fit.
1142353		New City College	LP931	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 40 :Aspen Way	No			It is our view that the diagram of the site allocation should not include the indicative green area but that the text should lay out what is required, where open space should be provided as part of developments rather than in one single area.	Site Allocation The site is part of a wider site allocation, "4.1 Aspen Way", which includes land which is currently owned by the college, by TFL and some other landowners. We are generally in agreement with the principle of the site allocation to encourage redevelopment in the area. The allocation states that the area should be used for housing and employment uses, including small to medium enterprises. We agree that this is a suitable land use for the area, and that no restriction should be placed on the quantum of each land use. In terms of the design principles, improving connectivity with the Canary Wharf area, to and from Poplar DLR and the Canary Wharf Crossrail station, with other site allocations locally and more broadly throughout the area should indeed be a priority, and new bridges are a suitable way to reduce the division caused by Aspen Way. The location of these should be indicative based on the final design of any development either side of the main road. In terms of the housing mix for the site, the area is highly urban and located next to a major employment area and alongside busy roads. Therefore, it is our view that it is not suitable for high levels of family housing. We would therefore suggest that the line: "maximise the provision of family homes" In the site allocation is altered to read: "provide for some family housing" Given the number of different landowners across the site, we wish to ensure that each site can come forward without relying on other parts of the site or parts of the provision to be complete, as this will restrict the potential for development. It is the intention of the college to continue to provide education on their site.			The text sets out what is required. Where infrastructure is re-provided, it will need to be compliant with the other policies within the plan. The plans will state that they are for illustrative purposes Matters regarding family housing will be discussed further during the examination in public. Sites that have a number of landowners may require effective engagement to facilitate potential land assembly and comprehensive redevelopment. Discussions regarding phasing would be addressed through the development management process. It has been noted that the college wishes to continue to operate during the development of the site. As evidenced in the boroughs Parks and Open Space Strategy (2017-2027) the borough currently has an open space deficiency and based on population growth projections this will continue to grow if the current amount of open space in the borough remains unchanged.

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								The site allocation states that 1 hectare of open space should be provided. Given the existing situation of built form and railways, we believe that this is an onerous requirement which should be changed to a more general wording which requires functional open spaces which enhance the developments. It is our view that the diagram of the site allocation should not include the indicative green area but that the text should lay out what is required, where open space should be provided as part of developments rather than in one single area.			<p>In order to mitigate this deficiency the strategy identifies specific sites to establish new strategic open space, strategic open space is classified as 1ha and above. The strategy identifies the site as being within the Canary Wharf ward which has a high deficiency projection in 2031. Aspen Way is specifically identified in the strategy to provide a park and active recreation space for a significant new community on a site with strong lines of severance. We consider that this strategy clearly identifies the requirement for a minimum 1ha of open space to meet the borough and local deficiency both currently and as a result of future population projections. Therefore, we consider that there is justified evidence supporting the requirement of 1ha of open space on the site in the Local Plan.</p> <p>The plans will state that they are for illustrative purposes, however the design principles have set out how the public square and green open space should function with the north south links and DLR station.</p>
1142985	Transport for London (TfL)	Transport For London	LP752	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 41 :Billingsgate Market	N/A		<ul style="list-style-type: none"> As with the previous site allocation - the bridges across Aspen way should be included in the infrastructure requirements as these should be a strategic priority. More information regarding the actual feasibility or indeed desirability of a cycle route across the site from east to west is required. This risks conflicting with the wider aspirations to activate the dockside as it may conflict with activities such as overspill seating and viewing or promenade areas. TfL suggest there should also be a focus on improving connections to CS3 to the north. The bullet regarding treatment of Upper Bank Street needs further explanation as it is unclear what this is referring to specifically and to reflect the fact that Upper Bank Street is a private road. 				<p>Bridges will not be included in the infrastructure requirements but have been included in the delivery considerations.</p> <p>The plans are indicative, however we will change part of the route on the southern boundary to a local route rather than strategic. However, part of the route is the London cycle network.</p> <p>The CS3, route is to the north of Aspen Way site allocation and some distance from the site so it would be difficult to provide other connections through the site but further detail could be discussed through the development management process.</p> <p>It is proposed to remove reference to Upper Bank Street as follows:</p> <ul style="list-style-type: none"> improve quality of public realm including its external connectivity (specifically along Upper Bank Street) to address the severance caused by Trafalgar Way, Aspen Way, Upper Bank Street and the North Dock.

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1142985	Transport for London (TfL)	Transport For London	LP753	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 41 :Billingsgate Market	N/A			<ul style="list-style-type: none"> Are the green grid projects existing or proposed? It is unclear what they actually mean - i.e. Are they proposed physical connections or just areas for additional greening / planting? Make the keys much clearer – for example the bridge links in the Isle of Dogs should be identified as proposed. Where does the strategic cycle connection go to the north if Blackwell basin? Is this really a strategic connection? 				<p>Green grid projects are defined in the Green Grid Strategy but amongst other things they comprise additional greening as well as new physical spaces.</p> <p>The key will be amended to indicate that that the bridge is proposed.</p> <p>The cycle network to the north of the Blackwall Basin will be amended to a local pedestrian route which will connect to the north of the Blackwall Basin.</p>
1143156	Hondo Enterprises	Hondo Enterprises	LP776	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 42 :Crossharbour Town Centre	Yes		The East Ferry NCP Car park falls within the Crossharbour Town Centre Site allocation in the emerging Local Plan. It is noted that this allocation is carried forward from the existing Managing Development Document Site Allocations which is fully supported. The aspirations for the wider Isle of Dogs and South Poplar sub-area are fully encouraged including creating attractive and distinctive places; meeting housing needs, delivering economic growth; revitalising our town centres; protecting and managing our environment; enhancing open spaces and water spaces; improving connectivity and travel choices. The overall land use designation for the site to include					<p>Comment noted, however the exact location of the supermarket will be addressed through the development management process. It is proposed to amend the design principles as follows:</p> <ul style="list-style-type: none"> comply with the requirements of the Millwall Inner Dock tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and Mudchute Park. Specifically, it should acknowledge provide a transition in scale, height, massing and urban grain from the low rise nature of the immediate residential area to the north and east, and address the setting of the local nature reserve and Mudchute Park.

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						<p>retail floorspace and other compatible uses including housing is wholly appropriate in this location and is fully supported. The need to provide infrastructure requirements, including a primary school, community/local presence facility and re-provision and expansion of a healthcare centre is acknowledged and understood in order to support the growth of the area. It is considered that the most appropriate place for the anchor supermarket will continue to be the existing Asda site as per the previous consent for the site (ref. PA/11/03670/A1). The provision of a new public square is welcomed and it is recognised that connections between the East Ferry NCP site and the existing Asda site should be strengthened in order to enhance the public realm and deliver a successful District Centre. It is noted that development should respond positively to the existing character, scale, height, massing and fine</p>					

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							<p>urban grain of the surrounding built environment and Mudchute Park and the low rise nature of the surrounding residential. However, this should not preclude tall buildings given the site's location within the Isle of Dogs Opportunity Area and within the Millwall Inner Dock (Isle of Dogs) Tall Building Zone. Recognition within the site allocation for the provision of tall buildings in line with Policy D.DH6 is therefore requested.</p>					

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1142339	Sharon Jenkins	Natural England	LP213	PART 4: DELIVERING SUSTAINAB LE PLACES, Figure 42 :Crossharbo ur Town Centre	Yes			Thank you for your consultation on the above dated 2nd October 2017. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Local sites Two of the proposed site allocations are adjacent to Local Nature Reserves (LNRs). Namely, site 2.1 – Bow Common Gas Works - which is adjacent to Tower Hamlets Cemetery Park LNR and site 4.3 – Crossharbour Town Centre - which is adjacent to Mudchute Park Farm LNR. Both of these designated sites contain deciduous woodland, which is a priority habitat (as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) and may be sensitive to construction related impacts in the surrounding area. The authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines planning applications on sites 2.1 and 4.3, as per paragraph 5 of Policy D.OWS3 within the Local Plan. Natural England does not consider the Plan unsound with regard to impacts on biodiversity. Nevertheless, we would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework), and we trust that Tower Hamlets Borough Council will make provisions towards enhancing the biodiversity value of Local Nature Reserves over the course of the plan period.' For any further consultations on your plan or any new consultations please contact: consultations@naturalengland.org.uk				Agreed. Proposed wording to the design principles: <ul style="list-style-type: none"> respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment, and Mudchute Park. Specifically, it should acknowledge provide a transition in scale, height, massing and urban grain from the low rise nature of the immediate residential area to the north and east, and address the setting of the local nature reserve and Mudchute Park. <p>The open space policies address enhancements to biodiversity.</p> <p>Information regarding the impact of future proposals on the site will be addressed through the development management process.</p>

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1142985	Transport for London (TfL)	Transport For London	LP754	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 42 :Crossharbour Town Centre	N/A			<p>▪ In line with previous comments, TfL would welcome further discussion in terms of the site boundary for this allocation, particularly in terms of expanding it to include the area to the north around Crossharbour Station, Selsdon Way and Pepper Street. Inclusion of this expanded area would create an enhanced District Centre with an integrated transport interchange. ▪ TfL welcomes the acknowledgement of the bus interchange on this location. This should include mention of bus standing, interchange and welfare facilities to support the District centre. ▪ The redevelopment of the District Centre needs to take account of and mitigate all users and to minimise any conflicts. For example between walking, cycling and bus use. ▪ East Ferry Road should be shown as a strategic cycling route in particular because it serves the District Centre. On another map Limeharbour is shown as strategic which gives a mixed message. ▪ Several routes that don't appear to connect to anything. What do the green grid routes mean and how will the one shown here be delivered?</p>			<p>It is not considered necessary to amend the boundary, as the requirements of the site allocation will still be met. It should be noted that reference has been made to connecting the site to Crossharbour DLR.</p> <p>Support of the bus interchange is noted. However, it is not considered necessary to go into detail about the support facilities that the interchange will provide to the district centre.</p> <p>The potential conflicts between pedestrians and cyclists are addressed through policy S.TR1 which the supporting texts specifically refers to the safety and accessibility aspects in relation to walking, cycling and public transport.</p> <p>It is proposed that the following changes are made to plan:</p> <ul style="list-style-type: none"> • Insert "Rail viaduct" into the key. • Remove the strategic pedestrian/cycling route along the southern boundary of the site through Mudchute Park. • Remove the northern section of the central local pedestrian/cycling route so that it ends where it intersects with the central public square. • Remove the northernmost section of the westernmost local pedestrian/cycling route where it intersects with the central green grid route towards the sites red line boundary. 	
1049487		Ashbourne Beech Property	LP110	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 42 :Crossharbour Town Centre	No	Justified			<p>The PTAL level is noted as 1b-5. Can this be clarified? From detailed analysis of the site it is understood the main part of the Centre benefits from a PTAL 3 – 4. Land use requirements are noted as housing and redevelopment of the district centre for retail floorspace and other compatible uses. This is noted. A primary school, community/local presence facility, health centre (re-provision and expansion) are the infrastructure requirements. The following questions are raised: a. Can the Council include the evidence base to justify the need for a primary school at the Centre? In particular, it is noted that the Cabinet Paper "Planning for School Places – 2017/18", dated 19th September 2017, notes excess capacity for primary school places to 2025/26 with the projected required additional capacity for 6FE being provided on other sites etc. b. What is the size and the components of the community / local presence facility that is described? c. What is the justification that is set out for the expansion of the health centre? At the present</p>	Yes		<p>The PTAL has been reviewed and is correct. It should be noted that the PTAL refers to the entire site so PTAL levels vary.</p> <p>The justification for the school on the site is outlined in the Site Allocations Methodology and in the Spatial assessment Need for Schools</p> <p>The Site Allocations Methodology provides details of the size requirements for a local presence facility. Details of the exact service the facility will provide is not a matter for the Local Plan</p> <p>There are a number of areas to the east of the borough (including Blackwall and Cubit ward, where Crossharbour medical centre is located) that are not within walking distance of facilities. This ward is expected</p>

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								<p>the existing facility has space capacity to cater for additional medical practitioners. It is stated at "Delivery Considerations" that the health centre and community facility is to be re-provided in association with the new community/local presence facility. This implies these uses are to be delivered at the same time and located near / next to each other. The wording should be amended to remove this reference as this unduly restricts the way the centre might be redeveloped, which as the Council knows, will have to be on a phased basis. It is inappropriate to stipulate these uses should be delivered at the same time or "in association" with each other as this adds unnecessary viability questions and will inhibit innovative and comprehensive designs for the Centre. The new square and new routes are to be "prioritised" in the phasing. Delivery of these aspects needs to be practical and to reflect development out of the site in a reasonable phased approach. Figure 42, p232 includes a site allocation plan. This identifies notional routes, public spaces and active ground floor uses. The following should be clarified? - Why the approach to active ground floor uses effectively across the north of the site? - The plan of Crossharbour contained in the Carter Jonas Tower Hamlets Retail Study identifies a primary shopping frontage on the eastern edge of the existing Asda supermarket. This is the existing position. It is unclear, however, why the site allocation diagram (figure 42) for Crossharbour, which envisages a redeveloped district centre, does not reflect the extensive pre-application discussions regarding proposals for a new district centre or the 2014 grant of planning permission for redevelopment of the Asda site which sees the supermarket re-located to the eastern part of the site; - How has the boundary of the Centre been determined? This is, for example, different to that included in the Carter Jonas Retail Study; - Why the indicative locations (three of them) of the public square? - The diagram appears to be based on the existing site layout, in the way it identifies routes and spaces. This is contrary the design principles at p230 which, amongst others, talk of creating a new town centre. The diagram should be re-considered.</p>			<p>to have one of the greatest increases in population growth and as a result Tower Hamlets are seeking to maximise healthcare growth in these areas.</p> <p>It is not considered necessary to remove the requirement for the health centre and community facility to be re-provided in association with one another as the term 'should' is flexible enough for this not to happen if it is sufficiently justified through the development management process.</p> <p>The plans will be amended to remove reference to active ground floor uses</p> <p>The design principles have left it flexible enough to discuss where the supermarket will be located.</p>

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762218		Lanark Square Ltd	LP570	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 42 :Crossharbour Town Centre	No	Justified			Within Chapter 5: Sub-area 4: Isle of Dogs and South Poplar, it is noted that Crossharbour Town Centre has been allocated as a site to be redeveloped to provide retail floorspace, other compatible uses and housing, alongside the provision of a number of infrastructure requirements including a primary school, community facility and the expansion or re-provision of a health centre. The allocation of this under-utilised site is welcomed, however, it only forms part of the Crossharbour district centre. The allocated land should be extended to include the Crossharbour Docklands Light Railway (DLR) station, Pepper Street (up to Glengall Bridge) and the Lanark Square Estate. The inclusion of this land into the site allocation will assist in the delivery of a number of the land use and design principles stated in the draft policy, including the ambition to create a new town centre with a range of retail, leisure and community uses and in making meaningful improvements to walking and cycling connections and general permeability between the Millwall Dock, the District Centre, Crossharbour DLR Station and Mudchute Park. In relation to Site Allocation 4.3 and its extension to include Lanark Square and Pepper Street, we suggest the following design principles are added: Reflect the proximity to Crossharbour DLR station in terms of effective utilisation of land and height, scale and mass. Improve connections across the District Centre to link the various retail and employment clusters such as Millharbour South, Pepper Street/Westward Parade and East Ferry Road.	No		It is not considered necessary to amend the boundary as the requirements of the site allocation will still be met. It should be noted that reference has been made to connecting the site to Crossharbour DLR. It is not considered necessary to include the proposed design principles as the existing ones already refer to connections to the DLR station. Scale and massing has also been addressed. Connections to Millharbour will be addressed through amendments to figure 42 as follows: Show East Ferry Road as a strategic pedestrian/cycling route.
1054534	Angelic Interiors Limited	Angelic Interiors Limited	LP220	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 43 :Limeharbour	No				AIL has land interests in the area identified below ("the Site"), which is bounded by East Ferry Road to the east, Marsh Wall to the north west and Chipka Street to the south. The Site can meet part of the opportunity area's development needs. It currently sits just outside two of the plan's proposed site allocations – Site Allocations 4.4 "Limeharbour" and 4.5 "Marsh Wall East". For each of those allocated sites, the draft plan provides clear guidance about how new development should come forward. (See rep for map of site). AIL proposes that the Limeharbour allocation is extended to include the Site. In doing this, the Council would be confirming that there should be a comprehensive approach to regenerating the area. In particular, the extended allocation would ensure that the redevelopment of the Site should form part of the vision for achieving a coherent approach to achieving a new place along Marsh Wall, and that the same design principles should apply to all land that fronts onto Marsh Wall.	Yes		No change proposed. The current site boundaries are considered to enable comprehensive redevelopment.

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829908	Andrew Wood		LP79	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 44 :Marsh Wall East	No	Positively prepared			This area contains many offices and should be part of the CAZ By placing housing above offices in priority strongly suggests that LBTH prefers housing in this area Not sure why The Madison currently under construction is not included in the site allocation	Yes		The CAZ is a GLA designation so would need to be designated by the GLA. The land use requirements and the delivery considerations seek to ensure that employment uses remain on site. The delivery consideration seeks to ensure that employment uses are intensified so it is not considered that housing is seen as a priority over employment, although we do have specific housing and employment targets. The Madison has been excluded because it is currently under construction.
1142692	Cubitt Property Holdings Ltd		LP131	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 44 :Marsh Wall East	N/A			Our client supports the designation of the Marsh Wall East area as a site which holds significant potential for new large scale mixed use development. In particular, the identification of the Marsh Wall East area as a suitable location for the development of tall buildings which contribute to achieving a suitable transition in building heights moving away from the tall buildings cluster in the Canary Wharf Major Centre, to the southern half of the Isle of Dogs. In particular, the designation of the site within the Canary Wharf tall building zone is supported, with the acknowledgement for new development to achieve a transition in height and form to maintain the significance and prominence of the Canary Wharf Cluster. In addition, it is noted that Policy DH6 of the LBTH Local Plan requires that proposals for tall buildings to be of a "height and scale, mass and volume that are proportionate to their role, function and context and in keeping with the character of the immediate context and of their surroundings". The site falls within the Isle of Dogs Opportunity Area and are covered by the South Quay Masterplan framework, which outlines the principles which provide prescriptive guidance on the form and composition of new development within this location. The site is identified in the South Quay Masterplan as a suitable location, for the development of a tall building (10+ storeys). Our client supports the classification of the site as a position		Yes		Support welcomed.

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							which holds potential for the development of a tall building. It is considered that given the sites context within an opportunity area and the character of the immediate vicinity of the site there is an opportunity for the introduction of a tall building of exceptional architectural quality, which will provide a suitable transition in building scale and form from the Canary Wharf cluster to the north of the site. The site is in an area characterised by tall buildings, with The Madison development (54 storeys) immediately to the west and Dollar Bay (31 storeys) further to the east. As such it is considered that there is significant potential for the introduction of a tall building in the region of 50 storeys. This would fall within the transitional plane of building heights moving east from One Canada Square to Dollar Bay on the eastern boundary of the Isle of Dogs REP REPEATED HERE AND IN TALL BUILDING ZONES				
1142716	Lyca Group		LP643	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 44 :Marsh Wall East	N/A		Site Allocation 4.5 - Marsh Wall East We support the identification of Lyca Group's Thames Quay site within the wider Marsh Wall East site allocation 4.5 (see Figure 44 below) as a site where development can be expected to be brought forward. contribution which this site should make to the Canary Wharf Cluster. Land Use Requirements The draft site allocation proposes the land use requirements as housing and employment (a range of floorspace sizes, including small-to medium enterprises). Infrastructure requirements include small open space (0.4 ha), a primary school and a health centre. We support the stated site allocation land uses which are noted as housing and employment. However, in order to bring forward the site at the earliest possible opportunity and to deliver a true mixed use place at Thames Quay, we suggest that further flexibility is added to the land use requirements to include scope for other supporting				<p>If other land uses that support the objectives of the allocation are considered to be appropriate then they will generally be acceptable in principle, providing they meet other policy requirements.</p> <p>The type of housing has not been specified, however policy S.H1 allows for various housing products</p> <p>Planning obligations will be in accordance with policy/legislation.</p> <p>It is not considered necessary to distinguish between the east and west of the site. The design principles refer to the surrounding built environment which includes the east and west of the allocation. The east has been specifically mentioned due to the sensitivity regarding amenity and design factors. The finer details regarding the east and west of the site can be addressed through the development management process.</p> <p>The design principles have been amended as follows:</p>

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							uses, and we therefore propose that the text is amended to read (amendments noted in red text here and throughout these representations): Land use requirements Housing · Employment (a range of floorspace sizes, including small-to medium enterprises) · Insert <Other supporting uses including but not limited to commercial, hotel, retail and leisure uses.> We support the land use requirement for housing within the draft site allocation, but suggest that ‘housing’ should be extended to include a variety of residential products including build to rent amongst others. Where a school or open space is required to be provided on site to meet the wider needs of the area, any costs of provision, including the opportunity cost of land, should be offset against the wider delivery objectives for the site. Design principles The draft site allocation notes that development will be expected to: “complement the tall building cluster in Canary Wharf through appropriate building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment, particularly the lower rise buildings of Cubitt Town to the southeast.” As noted previously, Lyca Group seek to redevelop the site to create a new ‘place’. As anticipated in the masterplan for South Quay, the site can be expected to bring forward a series of tall buildings and the allocation should distinguish between the townscape context that sits around the eastern and western end of the allocation. The site is located within the Canary Wharf cluster, and as such we suggest the wording is amended to the following: “Insert <make a positive contribution to> Delete<Complement> the tall building cluster in Canary Wharf through appropriate building heights insert <which will be in keeping with the character of the immediate context of their surroundings>, delete				<ul style="list-style-type: none"> • comply with the requirements of the Canary Wharf tall building zone designation (as set out in policy D.DH6), where tall buildings are proposed complement the tall building cluster in Canary Wharf through appropriate- • maintain the existing block structure building heights, whilst respecting and being informed by the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment-particularly. In particular provide a transition in scale in relation to the lower rise buildings of Cubitt Town to the south-east and ensure appropriate spacing between buildings to enable visual permeability between Marsh Wall and South Dock;

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								< whilst respecting and being informed by> insert < including> the existing character, scale, height, massing, views and urban grain of its dockside location and surrounding built environment, particularly INSERT < in the context of the eastern part of the allocation,> the lower rise buildings of Cubitt Town to the south-east." The draft site allocation also notes that development will be expected to: "integrate tall buildings with improved public realm and ensure development steps back from the docksides with fully accessibly active frontages." We suggest flexibility is added to this draft wording to provide the opportunity for a variety of architectural responses, as development may not necessarily need to step back from the dockside in order to create an active frontage. In light of this, we suggest that the policy wording is updated as follows: "integrate tall buildings with improved public realm and INSERT < seek to provide> DELETE <ensure development steps back from the docksides with> fully accessibly active frontages."				
1142985	Transport for London (TfL)	Transport For London	LP755	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 44 :Marsh Wall East	N/A			<ul style="list-style-type: none"> The existing trees along marsh wall make a strong contribution to its character and the allocation should refer to their retention and protection. 				Matters regarding the protection of trees are covered in policy D.ES3.
1142985	Transport for London (TfL)	Transport For London	LP756	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 44 :Marsh Wall East	N/A			<ul style="list-style-type: none"> Show proposed south dock bridge on the map and connections to this. 				The plans for Marsh Wall West (figure 45) will be amended to show the proposed South Dock bridge.
829908	Andrew Wood		LP80	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 45 :Marsh Wall West	No	Positively prepared			This area contains many small offices and should be part of the CAZ To not do so suggests that LBTH prefer residential in this location. It forces SME's out of the area as Canary Wharf is not an appropriate or viable location for many SME's	Yes		The CAZ is a GLA designation so would need to be designated by the GLA. The site is within the Tower Hamlets Activity Area which supports employment as well as other uses. The land use requirements and the delivery considerations seek to ensure that employment uses remain on site. The employment uses within the site allocation as well as policy D.EMP2 help to ensure that SMEs can be accommodated within the site.

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719346	John Turner	Ballymore Group	LP278	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 45 :Marsh Wall West	No				Allocation – Marsh Wall West We support the Marsh Wall West designation for the regeneration of the area however for the Council to achieve the targets outlined within the allocation developments should not be jeopardised through overzealous application of policies based on underdeveloped sites which do not account for the changing nature of the area. The designation states that the heights should act as a transition from Canary Wharf to the lower less dense developments to the south. However the lower density low rise nature of Millwall is inappropriate for its location and should not overly hinder the future delivery of homes. The delivery of homes in a sustainable manner in the Borough is only achievable through the provision of the correct scales of development. The Council must not restrict entirely appropriate development in the pipeline in order to protect under developed areas. Whilst it is important to respect the existing character, scale, height, massing, views and urban grain of the surrounding built environment the Council should also consider the substantial benefits which are accrued through the delivery of high density schemes within the site allocation. Cuba Street within the Marsh Wall West designation presents an excellent opportunity to deliver new housing on an underused site for the benefit of the Borough. The approach detailed above is currently a hindrance to its development and the Council should ensure that existing inefficient uses should not be barriers to its delivery. In addition it is noted that while Cuba Street is located within the Marsh Wall West Site Allocation it is not located within the associated Activity area. This inconsistency is at odds with the desire to redevelop the Marsh Wall West development area and we would strongly suggest that the activity area boundary is amended to include the Cuba Street site. Similarly there are also substantial opportunities within the Marsh Well West area which have not been identified by the Marsh Wall West and Activity Area designation. As highlighted in our January 2017 representations 161 Marsh Wall (Scandinavian Building) immediately to the north of the boundary is an underdeveloped site which sits within the context of substantial redevelopment. The site which has excellent long term prospects for redevelopment in the heart of Marsh Wall bringing forward new public realm benefits and the opening up of the docks to the public (supported by policy D.DH2). We therefore consider that the boundary of Marsh Wall West should be amended to incorporate 161 March Wall. This approach creates a natural progression following the Landmark Pinnacle along the docks northerly to Bank Street, both major regeneration areas.	Yes		<p>The design principles acknowledge the current character of the area and do not necessarily hinder high density developments. All developments will be assessed, amongst other things, in relation to their design and setting as well as amenity impacts. The wording for the design principles has been amended as follows:</p> <ul style="list-style-type: none"> • comply with the requirements of the two tall building zones, Canary Wharf and Millwall Inner Dock designations (as set out in policy D.DH6) that the site is situated in, where tall buildings are proposed, complement the tall building cluster in Canary Wharf through • provide appropriate taller building heights, whilst respecting positively complementing and being informed by the existing character, scale, height, massing, views and urban grain of specifically its dockside location and surrounding built environment, particularly the lower rise buildings of Millwall to the south-west; <p>Not being in the Tower Hamlets Activity Area does not necessarily preclude high density housing on the site. All applications will be considered on their merits.</p> <p>The current boundary of the site allocation is considered acceptable and able to deliver comprehensive development.</p>

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1142985	Transport for London (TfL)	Transport For London	LP757	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 45 :Marsh Wall West	N/A			<ul style="list-style-type: none"> The proposed bridge should be referred to consistently as a pedestrian and cycle bridge. The connection at the eastern end of the designated area should be highlighted as a public space as it approaches the bridge - this should be treated as an important transition space. 				<p>Figure 45 will be amended to include the existing and proposed bridges. However it is not considered necessary to amend the wording in the site allocation to refer to pedestrian and cycle bridges as the reference to foot bridge does not exclude cyclists.</p> <p>The plans are illustrative, however, the building plots and active frontages will be removed.</p>
1142493		Berkeley Group	LP374	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 45 :Marsh Wall West	N/A			A small part of the South Quay Plaza site has been included in the Marsh Wall West site allocation. We believe this is an inadvertent error as the remainder of the site is excluded, we assume because it has planning permission and is being delivered. The attached plan shows the area which is part of a piece of land purchased later by Berkeley which has now also been granted planning permission. We would be grateful if the Council could amend the plan to exclude this area also. NOTE: See letter for map.		Yes		This matter can be discussed further at the examination in public
829908	Andrew Wood		LP76	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 46 :Millharbour South	No	Positively prepared			Most of this site allocation has approved planning applications or applications recommended for approval None have a health centre, school or a material amount of open space included Only one site is left undeveloped, the offices at Greenwich View where the park is on the map It is unlikely to be viable for this site to be able to deliver what is required	Yes		The site has been allocated because the permissions are not guaranteed to come forward. In the event that they do not come forward in the form of the approved schemes, then we will be seeking to deliver the requirements set out in the site allocation.
1137662	Anil Mohinani		LP4	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 46 :Millharbour South	No	Effective			The area between Ability Place and 41 Millharbour have for years been used illegally and in violation of s106 agreements as commercial car park. The council have for the past 2 years tried to enforce the s106 agreement but with no success. There is an opportunity in this document highlight that the area should be a green zone. It should also be considered that all plots not currently used should be opened up temporarily as parks for people to use.	Yes		<p>Unlawful uses taking place on sites is dealt with by the Enforcement Team and not the Local Plan</p> <p>The site allocation directs where the open space should be located. With regards to temporary uses, where the use is within a town centre, policy S.TC1 supports meanwhile uses within town centres.</p>

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1142289		356 ACQ Limited and Millharbour ACQ Limited	LP189	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 46 :Millharbour South	No	Positively prepared; Justified; Effective; Consistent with national policy		Land Use Principles The Isle of Dogs is allocated within the emerging Local Plan as an 'Activity Area', which is identified as a town centre in the context of the NPPF and earmarked for major regeneration. Paragraph 23 of the NPPF requires Local Plans to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. The current draft allocation for 'Millharbour South' suggests that residential and employment uses are appropriate. We suggest that the site specific policy should recognise that alternative uses are compatible in this town centre in order to provide the necessary mix of land uses required to stimulate growth. The riverside location of a number of the properties within 'Millharbour South' would be appropriate for a range of uses to be introduced which would draw residents and visitors to the local area, including active ground floor frontages and visitor accommodation, both of which would be extremely compatible with the aspirations for the wider area. It is important to note that the adopted Managing Development Document (2013) suggests that mixed use development for the Millennium Quarter is wholly appropriate and notes that other compatible uses (in addition to residential development) should be sought. This has been extremely successful in regenerating the area thus far and should be retained through the new emerging policy position. We are not proposing a significant change from the existing policy position, however simply one which reinforces the successful existing approach. We would therefore recommend that the policy is updated to support the introduction of alternative uses including retail and tourism which would complement the town centre function and the major regeneration which is envisaged to experience for the Plan period. The allocation for Millharbour South should recognise that all town centres uses are appropriate and encouraged in this location. The current policy wording suggests that the land use requirements in Millharbour South are housing and employment, however this position contradicts with the wider policy position of focusing employment uses to Canary Wharf. The preferred locations for offices are principally focused further northwards towards Marsh Wall and Canary Wharf beyond. There is now increasingly less demand for commercial floorspace along Millharbour and it has become clear that this is not a preferred location for office occupiers, which our client has experienced in recent months following a refurbishment of the upper floors of Bellerive House which have received very little interest from prospective tenants and has remained unlet for 7 months thus far. The Plan needs to ensure that the	No	Chapter 5: Sub-Area 4: Isle of Dogs and South Poplar – Millharbour South Site Allocation Land Use Requirements Insert <Retail> <Visitor Accommodation> Design Principles Delete <specifically, it should step down from Canary Wharf to the smaller scale residential areas south of Millwall Dock>	<p>The housing and employment aspect of the site allocations to not entirely preclude other uses such as retail; therefore, it is not considered that any changes are required.</p> <p>The vision for the Isle of Dogs recognises the role of town centres so it is not necessary to repeat this in the site allocation</p> <p>Comment regarding the decreased demand for office space is noted.</p> <p>Proposed amended wording for the design principles:</p> <ul style="list-style-type: none"> • acknowledge the Millwall Inner Dock tall building zone designation set out in policy D.DH6. • respond positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf Marsh Wall to the smaller scale residential areas south of Millwall Dock and enable visual permeability between Millharbour and Millwall Inner Dock; <p>The site allocation does not conflict with the tall buildings policy; it provides more detail on the aspirations for the site.</p> <p>The vision for the Isle of Dogs recognises the role of town centres so it is not necessary to repeat this in the site allocation</p>

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								<p>wider policy aspirations for the Isle of Dogs are satisfied and that its location as a town centre / activity area is maximised. This would ensure that the Plan is consistent with national policy and effective in the sense of meeting the strategic needs of the Local Authority and reflect the position which is currently adopted and has been successful in regenerating the local area. Design Principles In addition to the above comments on the land use principles within 'Millharbour South', it is also important to ensure that the design principles do not conflict with the various consents that have been secured in this location and have either been built, are under construction, or are expected to be implemented in due course. The first 'design principle' of the Millharbour South allocation is to "respond positively to the existing character, height, massing and fine urban grain of the surrounding built environment and its dockside location; specifically, it should step down from Canary Wharf to the smaller scale residential areas south of Millwall Dock." This design principle contradicts itself in that it fails to recognise the vast planning and development activity which is currently being experienced in the wider area from Marsh Wall in the north, down through Millharbour to the Westferry Printworks in the south. Whilst there is a policy preference to stepping down from Canary Wharf to the residential area south of Millwall Dock, this does not take into account the wider townscape considerations of the planning approval granted by the Mayor of London in April 2015 at the former Westferry Printworks for the erection of nine buildings up to 30 storeys in height (GLA ref: D&P/3363/03 and LBTH ref: PA/15/02216). The site has been cleared with redevelopment anticipated to commence shortly, with this scheme significantly altering the wider townscape of the Millwall Docks. In addition, Baltimore Tower is located to the east of Millwall Inner Dock and rises 45 storeys above ground. This is expected to complete in late 2017, however has already significantly transformed the townscape of this part of the Borough with significant height achieved between Canary Wharf and Millwall Outer Dock. This tower falls approximately 150 metres south of Pan Peninsula and Harbour Central, i.e. where buildings are intended to be smaller, however achieves the same height (45 storeys +) as both of these schemes. Therefore this constructed scheme at Baltimore Tower and the proposed scheme at the Westferry Printworks have both already irrevocably altered the 'character, height, massing and fine urban grain of the surrounding built environment' as referred to within the Millharbour South allocation and therefore the policy needs to acknowledge this. Should this design principle be retained within the</p>			

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									<p>Millharbour South, then any development which responds positively to this list of criteria will ultimately contradict with the second part of the requirement which states that buildings should step down from Canary Wharf to the residential accommodation south of Millwall Dock. This contradiction in policy means that the policy cannot be considered 'sound' as it is neither positively prepared in that it does not reflect the existing and emerging built context, nor is it justified as requiring a step down from Canary Wharf cannot be considered the most appropriate strategy for the wider area given the 30 storey buildings that will be located at the southernmost point of the 'step down'. By removing the second point of the first design principle and simply stating that development in Millharbour South should "respond positively to the existing character, height, massing and fine urban grain of the surrounding built environment and its dockside location", then this will ensure that development is considered against the current and anticipated built environment within which it sits, rather than enforcing a 'step-down' which conflicts with those schemes which have been constructed or granted planning permission in the local area. Tall Buildings In addition to the site specific commentary on buildings heights addressed above, references to buildings height stepping down from Canary Wharf are also included in emerging Policy D.DH6 'Tall Buildings'. Policy D.DH6 recognises that the Millwall Inner Dock is a suitable location for tall buildings, stating that heights should drop away from the Canary Wharf cluster in order to support its central emphasis. It is considered that this wording is much more appropriate as it recognises that the cluster of buildings in Canary Wharf (50+ storeys) should be taller than those which surround it. The difference between the text in Policy D.DH6 is that the policy does not restrict taller buildings in Millwall Inner Dock and does not specifically state that they should continue to step down towards the height of the residential buildings south of the Millwall Dock. Whilst the text acknowledges that buildings should be smaller than the Canary Wharf cluster, there is recognition that this is more of a strategic assessment of ensuring that the integrity of Canary Wharf is retained on the skyline. This allows for applications to be assessed on their own merits against the context at the time of determination, which allows for completed schemes / those with planning permission to be taken into account, rather than a blanket approach to stepping down from Canary Wharf. This reinforces that the policy wording in the 'Millharbour South' allocation should be revised as suggested above to respond to the strategic policies held within the emerging Plan and ensure no conflict between</p>			

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									strategic and site specific policies. Summary The land use policies for Millharbour South should be updated to reflect its location within an identified town centre. Recognition that town centre locations are suitable for alternative uses including retail and visitor accommodation will ensure that the emerging Plan is consistent with national policies and can be considered sound. The conflicting requirements of the design principles should be simplified having regard to the recently constructed and planned redevelopment of the wider area. The specific requirement to step down from Canary Wharf in Millharbour South should be removed as it does not take into account the 30 storey buildings which will be developed at the former Westferry Printworks, nor the 45 storey Baltimore Tower, which is nearing completion; The policy can be amended to ensure that any future proposal is still required to respond positively to the character, height and massing of surrounding buildings. This amendment would ensure that the Plan is positively prepared and also justified in terms of the tests of soundness.			
719346	John Turner	Ballymore Group	LP279	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 47 :Millharbour	No				Site - Millharbour As outlined within our January 2017 representations it is strongly considered that the 76 Marsh Wall (Design Cube) building should be included within the redline plan of the Millharbour designation. One of the key principles of Millharbour is the provision of active frontages and access along the dockside required to create a series of interconnected spaces in accordance with the Green Grid. The Design Cube is currently one of the few buildings within Millharbour which creates activity within the dockside. The designation of the Design Cube within the Millharbour allocation would provide a strong policy context for the future retention of leisure and entertainment uses providing further improvements to the activity of the area.	Yes		No change proposed. The existing site boundary is considered to be enable the comprehensive development of the area.

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624580	Jason Larkin	Canary Wharf Group Plc	LP545	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 48 :North Quay	No	Positively prepared; Effective			There is no reference or acknowledgement to the implemented planning permission (PA/03/00379) on the North Quay site. This provides context for any redevelopment of the site. Housing is an identified use for the site but this is limited to 25% floorspace in terms of maximum provision. We have commented separately on the appropriateness of the 25% cap and that despite being in pre-application discussions since June 2016 on the North Quay site with a planning application submitted in April 2017, there has been no discussion with Canary Wharf Group with regard to this 25% figure. As per our comments on draft policy S.EMP.1, the Site Allocation text should make reference to “greater weight” being given to offices and other CAZ strategic functions and reference to a 25% figure should be deleted. The design principles set out between ‘Infrastructure requirements’ and ‘Delivery considerations’ in the Site Allocation table seem to be largely taken from the ‘Site Allocations – Heritage Assessment’ (2017) evidence base document. Section 3 of the document states inter alia: “The heritage assessment will consider all heritage assets that are designated and nondesignated on the site and within the immediate vicinity. The contribution of the site to the significance of the heritage assets has broadly been considered and incorporated into the design principles for the sites that we are seeking to allocate.” For the North Quay site (page 32) the relevant heritage assets identified are “Strategically Important Skyline” and “Local Designated Views”. The strategically important skyline identified in the Tower Hamlets ‘Tall Building Study’ (2017) is not a heritage asset – it is the silhouette of the modern skyscrapers located at Canary Wharf. Secondly, no attempt is made in the ‘Site Allocations – Heritage Assessment’ document to define which local designated views are relevant to the North Quay site allocation. We have set out above in our comments on draft policy D.DH4 the issues with regard to the Council’s approach to identifying local views. Notwithstanding this, we set out in our Regulation 18 Consultation comments why a view is not a heritage asset (para. 15) and those references to views in the Regulation 18 Draft Local Plan being defined as heritage assets have correctly been removed in the Regulation 19 Draft Local Plan. Given this background, it is our view that the basis on which the development principles on which the North Quay Site Allocation are founded in flawed. It is also difficult to understand how some of the development principles are related to the identified “heritage assets” cited in the Site Allocations – Heritage Assessment document. It is against this background that our comments on the North Quay Site Allocation design principles are made. Reference is made to “new” north-south links between Canary Wharf and			<p>Comment noted. The figures/diagrams are for illustrative purposes. The boundary will be discussed at the examination in public. Views are not heritage assets but they form part of the setting. Amendments have been made to the Heritage Assessment confirming that they are not. Details of the views can be found in the policies map, however, consideration will be given to updating the heritage assessment. We do not agree that the development principles are based on flawed information. An assessment was made with regards to various matters, including heritage. Design principles have been amended by making minor modification:</p> <ul style="list-style-type: none"> • improve strategic links from Canary Wharf to Poplar High Street through the provision of new enhanced north-south link • improve the quality and create a positive sense of place with an arrival points in the form through the delivery of an active public square at the northern corners of the site, which interconnects to a north-south linear square from the connecting the Canary Wharf Elizabeth Line Station and the dockside promenade (Elizabeth line) to the Poplar DLR Station and Poplar High Street; and. <p>Figure 48 has been amended by making minor modification as follows:</p> <ul style="list-style-type: none"> - remove the section of the strategic/pedestrian cycling route on Upper Bank Street - Shorten the length of the strategic and pedestrian cycling route going over Aspen Way (remove the curved part of the arrow at the top) - Amend central north south strategic pedestrian/cycling route so that it aligns with the green grid from north to south. - Amend plans to show the location of the existing bridge - Amend the plans to show the green grid running along the north west boundary of the site and along the north west section of the site. Extend the green grid that runs through the centre of the site to the north so that it aligns with the strategic pedestrian and cycle route

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								<p>Poplar High Street. Existing links are being enhanced as part of the North Quay planning application but no need has been identified by Council officers, TfL or the GLA for new north-south links to be brought forward as part of the North Quay planning application. We would refer to our analysis above and reference to the 'Tower Hamlets Green Grid Strategy: Update 2017' evidence base document which does not set out any requirement for a "new" north-south link from the North Quay site to Poplar High Street. As such, this requirement is not justified and the text should be amended as follows: "improve strategic links from Canary Wharf to Poplar High Street through the provision of new enhanced north-south links;" Reference is also made to an active public square at the northern corners of the site, this isn't reflected on the associated Site Allocation diagram, does not form part of the submitted North Quay planning application and does not make sense given that the northern corners border Aspen Way. Again, the approach is not justified and the text should be amended as follows: "improve the quality and create a positive sense of place with an arrival points in the form of an active public square DELETE <square> INSERT < space> at the DELETE <northern corners> INSERT < centre > of the site, which interconnects to a north-south linear square route from the Canary Wharf station (Elizabeth line) to Poplar DLR station/Poplar High Street; and"</p> <p>The Site Allocation diagram shows strategic cycle routes passing both east-west and north-south through the site, a local pedestrian/cycle route set back from Aspen Way on the northern part of the site and the Site Allocation text refers to accommodating a new east-to-west cycle route through the site which joins into the cycle network and pedestrians movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station. Again, this isn't reflective of pre-application discussions, there has been no request for these strategic routes from TfL and the cycle routes shown don't take account of level changes or directly connect into any existing cycle network. As such, all references to new cycle routes through the North Quay site should be removed from the Site Allocation text and diagram: "improve or enhance walking DELETE <and cycling> connections to, from and within the site to: a. accommodate a new east-to-west DELETE <cycle> route through the site which DELETE <joins into the cycle network and > INSERT <enhances> pedestrians movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station; b. DELETE <facilitate> INSERT enhance connections across Aspen Way and DELETE <across> INSERT < towards >Trafalagar Way DELETE <towards>, Blackwall Basin, Poplar High Street, and Canary Wharf, and to</p>			<p>Minor modification has been made to all site allocation figures to remove active ground floor uses and plots. The following design principle has been amended as thus:</p> <ul style="list-style-type: none"> • improve or enhance walking and cycling connections to, from and within the site to: a- accommodate a new east-to-west pedestrian/cycle route through the site which facilitates connections to joins into the cycle wider movement network and the DLR and underground stations adjoining the site; pedestrians movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station; b- facilitate walking and cycling connections across Aspen Way between Canary Wharf and Poplar High Street and across and towards Trafalgar Way and towards Blackwall Basin, Poplar High Street and Canary Wharf, and to the wider area; and e- address the barrier of Aspen Way and integrate the site with Poplar High Street to the north, and the Canary Wharf Elizabeth Line Sstation Crossrail station to the south west. These routes should align with the existing urban grain to support permeability and legibility.

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								the wider area; and c. address the barrier of Aspen Way and integrate the site with Poplar to the north, and the Canary Wharf crossrail station to the south west. These routes should align with the existing urban grain to support permeability and legibility." The Green Grid designation on the Site Allocation diagram (Figure 48) is inconsistent with Figure 38 and should be realigned consistent with Figure 38 to run along Upper Bank Street. What are identified as Public Squares on the Figure 48 diagram are in fact linear public spaces and the title in the Key should be updated accordingly. Within the North Quay planning applications, active frontages have been maximised with key frontages facing the dock. Figure 48 however shows an active frontage facing the underside of the DLR tracks. Whilst within the North Quay planning application this area is activated through the provision of residential entrances, this is not an appropriate area for identified active frontages on a Site Allocation. These should be limited to those frontages facing the dockside in accordance with the Water Spaces policies. Finally, the Figure 48 does not reflect the developable area that comprises the current North Quay planning application.			
1142985	Transport for London (TfL)	Transport For London	LP758	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 48 :North Quay	N/A		There appears to be an inconsistent message in terms of the requirements between site allocations. For instance, why are there such minor infrastructure requirements for North Quay when compared to others in the area and across the borough? This needs to be presented in a more consistent manner. ▪ The improvements to the Poplar Bridge and north – south connectivity should be clearly stated as an infrastructure requirement for this site. ▪ The Plan should also look to improve north - south cycle connections in this area to get people across Aspen Way and north to the strategic cycling route (CS3). ▪ Map - Upper Bank Street strategic connection is not consistent with what is shown in other maps and images.				The Site Allocations Methodology provides details of the infrastructure requirements. It is not considered necessary to refer to the improvements to Poplar bridge as an infrastructure requirement. Connections are addressed in the design principles and delivery considerations. The CS3 route is to the north of Aspen Way site allocation and is some distance from the site so it would be difficult to provide other connections through the site. However The site allocation does show a link to Aspen Way which could then connect to the CS3. Further detail could be discussed through the development management process. Minor modifications to Figure 48 include: - remove the section of the strategic/pedestrian cycling route on Upper Bank Street - Shorten the length of the strategic and pedestrian cycling route going over Aspen Way (remove the curved part of the arrow at the top) - Amend central north south strategic pedestrian/cycling route so that it aligns with the green grid from north to south. - Amend plans to show the location of the existing bridge

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829908	Andrew Wood		LP75	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 49 :Reuters Ltd	No	Positively prepared			This is the last major developable site in Blackwall without planning permission or other use. Put bluntly Blackwall is the worst planned place in the UK No GP surgery, no state schools, inadequate child play space, no park, only 1 medium sized grocery store NISA, limited cafes/restaurants etc This is the only site where more could be delivered to compensate for previous errors. At a minimum a large grocery store should be mandated and extra child play space plus possibly river bus stop The pier shown on the map was also removed last year	Yes		Minor modifications have been proposed to amend the boundary of the site allocation to exclude the pier. Amendments will be made to figure 49 and the following bullet point will be removed from design principles: explore the opportunity to incorporate the existing jetting pier into the development. The site allocation requires open space to be provided in addition to the open space associated with the housing. Furthermore, a positive sense of place should be developed with an arrival point in the form of an active public square at the corner of Blackwall Way. The site allocation includes the provision of a primary school. The river bus stop is being considered by TfL but the exact location has not been determined.
1143450	Thomson Reuters		LP940	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 49 :Reuters Ltd	N/A			Site 4.10 – Reuters Ltd We support the identification of the site as a site where development can be expected to be brought forward but would emphasise the need, as set out above, for this to also recognise that the site has an important role within the operational strategy for the wider business of Thomson Reuters. The draft site allocation proposes that land use requirements as housing and the re-provision of existing employment by way of intensifying employment job numbers. In addition, there is a proposed infrastructure requirement of 0.4 hectares of small open space and the inclusion of a primary school. It would appear from Figure 49 that the Council consider the whole of the site to be developable. In this regard the Council should be aware that any uses that might arrive on this site will need to have regard to the existing operational infrastructure that will remain in situ and we would encourage the Council to engage in dialogue in this regard. Given that the site will retain the existing Thomson Reuters infrastructure the site becomes more constrained than Figure 49 of the Local Plan suggests. As such, we would caution any reliance that the Council might place on this site for the delivery of Borough infrastructure such as open			Comment noted. Any applications coming forward will have to demonstrate how the development can work alongside the existing employment uses. As such, it is considered necessary the wording remains in the site allocation. The open space is required for the site and has been taken into account in the viability assessment. Therefore, it is considered that the site has the ability to be developed along with the provision of open space. Additional work is being prepared regarding the schools.	

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								<p>space (beyond the needs generated by any redevelopment of the site) and schools which may compromise the delivery of this site for housing given that it has the potential to disincentive a willing landowner or developer to bring it forward. In terms of the housing allocation the site offers an excellent riverside setting which presents an opportunity to deliver a high quality residentially led development. The site's location next to the river would enable a pleasant waterside environment. This relatively open environment when compared to more land locked sites lends itself well to good environmental conditions such as daylight/sunlight factors and the ability to deliver high quality housing should be optimised in this location. As such, we fully support the Council's aspirations for a residential use on the site. Given the constraints of the site we do not consider that a primary school is best suited for this site. In order to incentivise the site to come forward and aid the delivery of housing, we suggest that the infrastructure requirements are amended to remove the requirement for a Primary School and seek to optimise the site's river front vantage for residential development. The site allocation also seeks to ensure that re-development of the site contains re-provision of the existing employment. As set out above, the existing uses on the site remain an operational requirement for Thomson Reuters and there is therefore no intention of losing jobs on the site at this stage. Therefore, we consider that the requirement for employment re-provision is unnecessary. We therefore propose that the land use requirements for the site reflect the current market led demand for flexibility and state housing to be the favourable land use only and that the Primary School be deleted from the infrastructure requirements.</p>				

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1142985	Transport for London (TfL)	Transport For London	LP759	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 49 :Reuters Ltd	N/A			▪ The pier highlighted within the text and map no longer exists.				Minor modifications have been proposed to amend the boundary of the site allocation to exclude the pier. Amendments will be made to figure 49 and the following bullet point will be removed from design principles: explore the opportunity to incorporate the existing jetting pier into the development.
829908	Andrew Wood		LP74	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 50 :Riverside South	No	Positively prepared			Completely misses the issue about the proposed Rotherhithe to Canary Wharf river crossing announced by Mayor Sadiq Khan in October 2016 and now subject to a TfL consultation Two of the proposed crossing sites either terminate next to, around or in this site There is a missed opportunity to add the requirement to support a bridge or tunnel termination in this location as part of the site allocation That makes the delivery of a crossing less viable	Yes		No change proposed. The delivery considerations state that development should not prejudice the potential delivery of a river crossing.
1105881	Michael Atkins	Port of London Authority	LP368	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 50 :Riverside South	N/A			23. Part 4: Delivering sustainable places, Westferry Circus (Pages 256-257) In regards to the Westferry Circus / Riverside South site, The PLA request to be involved as part of any discussions regarding the proposed river crossing across the River Thames identified at this location.				Comment noted.

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1143412		J P Morgan Chase	LP914	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 50 :Riverside South	No	Justified; Consistent with national policy			Summary 1. In land use terms, the allocation for Riverside South identifies the site as falling within a preferred office location (secondary), which allows for a maximum provision of 25% housing floorspace. It is not considered that such a land use allocation is justified and accordingly the site allocation as currently drafted is considered to be unsound. 2. It is acknowledged that the Preferred Office Location boundary has been revised which provides greater flexibility in terms of land use mix, but the cap on the maximum housing floorspace is not justified, does not reflect the local circumstances and is inconsistent with national planning policy. 3. Riverside South is a unique site both in the context of the Isle of Dogs and also the Borough. It is a large brownfield site measuring over 2 hectares. It is on the edge of the Canary Wharf Estate and has a continuous frontage to the River Thames. The recent planning history of the site shows that it has huge capacity to deliver a large amount of floorspace for the Borough. It is evident therefore that the site can deliver a large proportion of the Borough's employment and/or housing targets. In addition, other scheme benefits relating to social, green and blue infrastructure can be delivered by this site. The arrival of the Elizabeth Line at Canary Wharf in 2018, in addition to on-going enhancements to existing public transport infrastructure will further increase the capacity of this site. Given the truly unique nature of this site to the Borough, it is important it is not arbitrarily constrained by rigid floorspace apportionments. 4. We consider the particular relevant material considerations below. The Location 5. Riverside South is located on the periphery of the Canary Wharf estate and sits outside the commercial core. This is acknowledged by Peter Brett Associates ('PBA') in their Preferred Office Locations Boundary Review (July 2017) report. PBA state "We note that whilst the area west of Westferry Road is also afforded a PTAL score of 5, the road which has a minimum of four lanes at this point creates a clear separation between the areas. The distinction between the areas east and west of Westferry Road/Circus is also evident in land use and building typology terms, with the landmark Canary Riverside residential/hotel complex in sharp contrast to the office buildings to the east. Thus, we conclude that Westferry Road is a logical delimiter of the Zone A area, with the area to the west of Westferry Road, but south of Westferry Circus being identified as Zone B. Whilst there could be longer term scope west of Westferry Road and north of the Limehouse Link either side of Milligan Street where there is largely low rise low density housing, Westferry Road acts as a very strong barrier at that point, firmly separating this area from the POL" (our underlining). 6. We note that the references to Zone A	Yes		The wording in policy S.EMP1 has been amended to allow greater flexibility and the wording in the site allocation land use requirements will read: <ul style="list-style-type: none"> Housing: (25% floorspace in terms of maximum provision) The wording relating to housing allows for greater flexibility in terms of housing numbers and the employment uses are considered to be flexible enough and are not exhaustive. With regards to the sites POL designation, the evidence has been prepared and an assessment was carried out and it was considered that the site lies within the secondary POL. The site allocation states that the site can deliver at least 500 homes, not up to. Paragraph 5.3 of the Site allocations Methodology confirms that the threshold was taken from London Plan policy 3.7).

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									<p>and Zone B areas in the PBA commentary above is in relation to Table 1.1 in the Mayor of London's CAZ SPG. We consider these zones further below in our representations. 7. In addition to this assessment of the area by PBA, it is noted that Riverside South is adjacent to residential to the east and south. In particular, to the east beyond Westferry Road is the Newfoundland site. This site benefits from a planning permission for 568 residential units (ref: PA/13/1455 and PA/13/1456). The building is currently under construction. The delivery of over 550 residential units on this site will further change the land use character in this area and create further separation between the Canary Wharf estate and the west of Westferry Road. Amongst other things the Committee Report in respect of the Newfoundland site states "The site is somewhat divorced from the main Canary Wharf estate by being located at a lower level and positioned at the western extent of the site". 8. In spatial and geographical terms, it is evident that the Riverside South site does not form part of the commercial core and as a matter principle should be considered suitable for a mix of uses. Indeed, by reference to Table 1.1 of the CAZ SPG, one might conclude that Riverside South sits within a more residential neighbourhood (Zone C), given the residential nature of the adjoining sites (rather than Zone B as concluded by PBA). The mix of uses 9. Having regard to the above it is clear the reallocation of the Riverside South site to allow a mix of uses is appropriate, as this part of the Isle of Dogs is increasingly mixed use in nature, however the identification of the site as a Secondary Preferred Office Location with its rigid 25% floorspace housing cap is not justified, and does not reflect the specific circumstances of the site, or the full potential of the site. 10. Further, such a rigid approach is inconsistent with the CAZ SPG and reflects an inaccurate interpretation of this policy guidance. The PBA report - Preferred Office Locations Boundary Review - indicates that Riverside South falls to be within Zone B by reference to Table 1.1 of the CAZ SPG, where the priority/balance of land uses in this Zone is described as: "Offices and other CAZ strategic functions should be given greater weight relative to new residential" (our emphasis). The SPG confirms that such an approach reflects the importance attached to CAZ strategic functions in London Plan policies 2.10 and 2.11. We note policy 2.10 considers "Strategic Functions" and confirms the Mayor will and boroughs and other relevant agencies should inter a/ia "ensure that development proposals to increase office floorspace within the CAZ and the north of the Isle of Dogs Opportunity Area include a mix of uses including housing ... ". It is clearly the deliberate intention of the GLA not to specifically identify proportions of</p>			

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									<p>commercial and housing land uses within the defined zones. 11. PBA however attempt to quantify the "greater weight" guidance for Zone Band state "As a guide, and to help inform how we define the boundaries, our view is that for Zone B the Council should seek at least 75% office or other 'core CAZ' uses as part of any development proposal. This is on the assumption that this 75% will not be achievable on all sites, and other development management factors may reduce the final yield. But, starting at 75% should ensure that CAZ uses are predominant in the Zone B areas and active consideration is always given to the 'greater weight' for offices and other CAZ strategic functions in the Zone B area". (our underlining). 12. Having reviewed the PBA report, we conclude that the 25% maximum floorspace provision set out in the Riverside South allocation has been derived from the PBA analysis and based on their interpretation of the Mayor's guidance of what is meant by "greater weight" i.e. 75:25. However, as PBA acknowledge, such an apportionment was only formulated "as a guide ... to help inform". 13. Further, we note that PBA in their analysis were not suggesting a rigid cap as is now proposed by these policies, indeed the reserve is the case. PBA specifically say (para 1.9) "Due to the vagaries of individual sites it is not sensible to prescribe rigid targets and the broad percentages ... should be applied pragmatically to account for individual site circumstances" (our underlining). We would therefore suggest it is erroneous for the Council to adopt the rigid cap in the Local Plan. The proposed maximum housing floorspace cap is not therefore properly derived from the Council's Evidence Base and as a result the policy is considered unsound (including site allocation policy 4.11 and S.EMPL). 14. We are therefore concerned that such an interpretation not only misrepresents the CAZ SPG in respect of Zone B, which simply seeks to give greater weight to offices and other CAZ strategic functions, but does not have regard to the specific circumstances of the Riverside South site. Further this rigid interpretation does not have proper regard to national and regional guidance, including the delivery of housing. In order to be "sound", the draft Plan has to be consistent with national policy. We note that the NPPF at paragraph 22 states: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose." This NPPF guidance was also specifically referred to in the Committee Report for the Newfoundland permission (ref: PA/13/1455 and PA/13/1456). Accordingly, the rigid approach set out in the draft Local Plan renders the draft policy inconsistent with the NPPF and is therefore unsound. 15. We note that paragraph 1.14 of the PBA report</p>			

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									<p>confirms the tasks for their study are amongst other things to "define the Zone A and B boundaries". Such a task we consider is spatial in nature and should therefore not result in policy formulation relating to proportions of commercial and housing land uses on specific sites. Accordingly, it is concluded that the maximum housing floorspace cap for the Riverside Site is arbitrary given PBA's interpretation and this we consider renders the site allocation policy unsound because it is unjustified. 16. Even if one were to accept PBA's analysis that Riverside South falls to be in Zone B, as opposed to Zone C, the proposed arbitrary cap on housing floorspace may further adversely impact on the deliverability of this site, which has been undeveloped for many years. In addition the proposed rigid apportionment of land uses may not maximise the opportunity presented by this large vacant brownfield site. Further, paragraph 5.34 of the draft Plan, specifically contemplates less than 75% employment: "When there is a deviation below the 75% ". This supporting text is inconsistent with the rigid percentages proposed. We also note paragraph 5.11 refers to "greater weight" in Zone B. In other words, these explanations do not justify the rigid Policy; indeed they are contrary to the rigid policy. Accordingly the policy is unsound, as it is not properly justified, as required by NPPF. Commercial Floorspace 17. Planning permission for a major redevelopment of the Riverside South site was first achieved in 2005 (ref: PA/03/00377). Further applications were submitted and approved in 2008 (ref: PA/07/00935) and 2009 (ref: PA/08/02249) for similar, very large floorplate commercial buildings. It is relevant to note that a material operation under the 2009 planning permission was carried out within the specified time limit. A Certificate of Lawfulness confirming that operations commenced prior to the expiry of the planning permission was issued by the Council in November 2012. 18. It is noteworthy therefore that despite refining the commercial scheme through a number of separate applications (and amendments) JP Morgan has thus far opted not to build out the planning permission for the large scale office redevelopment scheme. This is due to a number of factors including economic conditions, changing market expectations, commercial demand and supply and political uncertainty. 19. The office schemes were designed prior to the 2008/2009 recession and market conditions since have shown that demand for such large floorplate offices in more peripheral locations is limited. This has also been evidenced by other commercial schemes in more peripheral locations on the Isle of Dogs which have been redesigned as a result. The demands in the area have changed, in a direct response to this economic shift. These revised</p>			

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									<p>schemes have in particular been redesigned to reflect changing market patterns and commercial demand in more peripheral locations. Further, it is also evident that commercial schemes now need to be designed to attract a broader mix of future tenants, including growing firms in the creative media, technology and telecommunications sector. It is clear therefore that the commercial accommodation at Riverside South will need to respond to the market, particularly given its more peripheral location. 20. It is also relevant to have regard to the evidence and Council's position in respect of the Newfoundland site, given its adjacency to Riverside South. We note that in respect of the Newfoundland application the Council commissioned Jones Lang LaSalle (JLL) to appraise the evidence in the form of a report prepared by CBRE (on behalf of the applicant). The main conclusions of the JLL report were as follows " the supply of office development within Tower Hamlets generally is significantly outstripping demand, between 2011 and 2031 it is anticipated that the demand for office supply within the borough will be 440,123sqm but there is almost 2million sqm in the pipeline {1,959,312sqm). Within the docklands specifically there is 21.5million sqft of office space in the pipeline but only 1.7million sqft of demand". 21. It is noted that 1.7million sqft of demand is 157,934 sqm. The 2009 Riverside South permission (ref: PA/08/02249/A) was for 341,924 sqm of office space i.e. the consented scheme on Riverside South is for more than twice as much office-space as there is demand for in all of Docklands. By reference to the NPPF paragraph 22, it is clear that based on current demand there is no "reasonable prospect" of the site being brought forward for a commercial led scheme. 22. The Council accepted the advice of JLL and the evidence put forward by the applicant and concluded that the redevelopment of the Newfoundland site for residential use would not undermine the policy objectives of the Core Strategy for employment and its use for residential was considered to be consistent with the NPPF. 23. We also note that the above is consistent with the PBA report Employment Land Review (2016) which quotes GLA data confirming that there is a "very large office supply pipeline" in the Borough. 24. Thus whilst it is accepted that the site is able to deliver a significant quantum of commercial floorspace, with the above in mind, it is evident that the site allocation policy for Riverside South should not be prescriptive in respect of the proportion of commercial floorspace the site can deliver. It is also noted that Policy S.EMPI requires "[robust evidence to demonstrate] that the supply of sufficient employment capacity to meet future needs is not being compromised". This is considered to be a much higher test than the CAZ SPG which sets out (at</p>			

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								<p>paragraph 1.3.10) a much wider set of considerations including viability of the long-term office use, marketability etc. The draft Policy is thus not consistent with regional policy. Housing 25. Turning to housing provision, we note that the Site Allocations Methodology Report (2017) forming part of the evidence base states "The site [Riverside South] is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will also make a significant contribution to meeting the boroughs employment target". 26. We are unclear how the figure of 500 units has been arrived at, because even if one were to accept the 25% cap, 25% of the permitted area indicates that more units could be delivered. Further, given the nature and scale of the Riverside South site, and by reference to Newfoundland site (providing 568 residential units on a 0.48ha site), it is clear that Riverside South could provide more than 500 units, whilst still making a significant contribution to meeting the borough's employment target. There are also other nearby sites which benefit from planning permission which would suggest that Riverside South can accommodate more than 500 units, including City Pride and Arrowhead Quay. 27. We are aware that there is a pressing need for additional housing across London, including housing growth within Tower Hamlets. The FALP increased the current housing target for the borough to 39,314 additional homes in Tower Hamlets up to 2025, and it is expected that the draft London Plan to be published later this month will further increase the housing targets for the Borough. The Borough must therefore seek to maximise opportunities for housing development in line with the London Plan and the NPPF, including making the most efficient use of those locations which are well served by public transport and can accommodate higher density development, such as Riverside South. The NPPF promotes the efficient use of land with high density, mixed-use development and encourages the use of previously developed, vacant and underutilised sites to achieve national housing targets as well as encouraging alternative uses on protected employment sites if there is no reasonable prospect of the site coming forward for employment use. 28. With this in mind, the 25% cap on housing floorspace is considered unjustified and not consistent with the NPPF. Further we note that the Council's Core Strategy and NPPF consistency review in March 2013, confirmed that the other uses for vacant employment sites in Preferred Office Locations would be considered on an individual basis taking account of other policies and the assessment of the prospects of employment use coming forward. This assessment</p>			

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								<p>was made for the Newfoundland site. The Newfoundland Committee report stated "The NPPF and the consistency review of the Local Plan do allow a consideration of uses of individual sites within the POL where they are currently vacant". Concluding Remarks 29. Having regard to the above commentary is clear that the 25% maximum housing floorspace land use requirement set out in the Riverside South allocation is unjustified and inconsistent with regional and national policy. Further, in the light of site specific and other strategic commercial and residential considerations, the proposed apportionment is unnecessary and may adversely impact on the overall objectives of the Plan. It is important that this site specific policy for Riverside South provides sufficient flexibility to deliver both the commercial and housing objectives of the Plan. 6. Please set out what change(s) you consider necessary to make the document legally compliant or sound. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. 30. In order to ensure the Local Plan is justified and consistent with national policy, the site allocation should allow a mix of uses including employment and housing to come forward. The housing content should not be constrained by the arbitrary 25% floorspace cap, which we understand arises from PBA's interpretation of "greater weight" set out in Table 1.1 of the CAZ SPG. Given the locational considerations and other material considerations outlined in respect of commercial and housing land uses in the area it is evident that the site allocation should not specify specific apportionments of land uses. Such flexibility will allow the opportunity of the site to be fully maximised and which will ensure a number of the objectives of the Plan will be realised. 31. We propose that these policies better align with the CAZ SPG and remove the rigid 25% maximum housing floorspace target for Secondary Preferred Office locations. 32. These changes to the policy will ensure the policy is sound. COMMENTS DUPLICATED AGAINST EMP1</p>			

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1053309	Jane Wilkin	Environment Agency	LP251	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 51 :Westferry Printworks	No				NOTE THAT THE EA DID NOT OBJECT We raised in our previous comments that these sites have been subject to historic uses which have the potential to have resulted in land contamination, however this has not been included within the delivery considerations for the allocations. Land remediation is a significant consideration in the delivery of a development as in some cases it can take a long time to undertake assessments and remediation to enable commencement of the development. Assessments are required for these sites as part of the planning application to understand the potential contamination on site. The delivery considerations should be expanded for these sites to highlight the previous historic uses of the site which may have resulted in land contamination. Suggested wording: Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.	Yes		The delivery considerations can include the suggestion for an assessment to be undertaken prior to any development taking place, however the site allocations will not go into the level of detail as to what specific historic uses took place on the site. Proposed wording: An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
1143399	Westferry Developments Ltd.	Westferry Developments Ltd	LP935	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 51 :Westferry Printworks	N/A			The Westferry Printworks site benefits from a site allocation in the emerging Local Plan. The acknowledgement of this site as suitable for redevelopment is welcomed and supported. The specified land use requirement for housing is supported. Whilst the required land use for employment is supported in principle, it is suggested that the supporting text stating that employment uses should include the "reprovision of existing employment by way of intensifying employment job numbers" is omitted as it is unclear how the delivery of this could be achieved and is not justified or consistent with the planning permission granted on the site or the main policy objective for this site which is the delivery of housing. The site allocation should make clear that this is a housing-led scheme which can be complemented by other employment uses. The acknowledgement that retail uses could successfully be incorporated into a housing led mixed-use development at the site should be included within the site allocation. This would accord with the design principle which requires active frontages to the waterfront and be consistent with the consented development. Without such an inclusion in the site allocation, the			Support of the site being allocated is noted The wording relating to the land use requirements has been amended to say: Employment re-provision of existing employment by way of intensifying employment job numbers. A range of employment space sizes, including small-to-medium enterprises It is not considered necessary to specifically state that the development should be housing led. Details regarding the mix of the development will be discussed through the development management process. It is considered necessary to locate the open space adjacent to the river as it will create better integration between the borough's open and water spaces and will promote a safer and more enjoyable public access to the Docks, which has many health and wellbeing benefits in line with policy S.OWS2. The leisure centre does not have to be relocated - it just needs to be integrated into the development. The boundary will remain the same to ensure that there is a connection to the leisure centre. Improvements to the leisure centre will be funded by the Community Infrastructure Levy which has been fully taken into	

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								<p>design principles of the site allocation would not be deliverable and the opportunity to create a vibrant waterfront will be lost. The infrastructure requirements for the provision of strategic open space amounting to 1 hectare in total is noted. Whilst we support the provision of sport and recreation space on the site, the location adjacent to Millwall Outer Dock is overly prescriptive, inconsistent with the consented scheme and should therefore be removed from the site allocation. The requirement for the reprovision of a secondary school is also noted. During discussions on planning application P A/15/02216, it was agreed with the Council that there was no requirement to relocate the Tiller Leisure Centre within the development and that the main issue was to ensure that the scheme allowed a physical connection between it and the school playing fields. Such a physical connection was included in the approved application and the requirements of the site allocation were considered to be satisfied. The Leisure Centre is not required to ensure that the comprehensive redevelopment of the site is successful or facilitate the lawful implementation of planning permission P A/15/02216, given that it is currently operating independently and outside of our clients redline boundary. We note that the allocation boundary has not been amended to remove the Tiller Leisure Centre within the latest draft Local Plan. There is a contradiction as the delivery considerations for the site allocation requires development on site to connect to the existing leisure centre. It is considered that inclusion of the Leisure Centre within the infrastructure requirements is contrary to Paragraph 173 of the NPPF which states that "sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". The</p>			<p>account, or through another council-led funding source.</p> <p>The extent to which policy requirements are "subject to viability" is directed by national and regional planning policy and there is no need to state this in respect of every individual policy within the Local Plan.</p> <p>Matters regarding family housing will be discussed further during the examination in public.</p>	

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								inclusion of the Leisure Centre within the site allocation is an example of ineffective planning, setting requirements for the site that are not deliverable. It is requested that the geographical extent of the site allocation accords with the red line boundary of the consented scheme at the site, which is attached to this letter. This reflects the ownership boundary of the site; a site allocation that does not concur with this is not justifiable, deliverable or effective. As the infrastructure requirements of this site allocation are extensive, the site allocation should note within 'delivery considerations' that the requirement to provide these, along with other local plan policies, is subject to development viability. This is necessary to ensure the site allocation is effective and deliverable. The design principles of the site allocation are extensive and are broadly supported. The requirement for buildings to step down from Canary Wharf to the smaller scale residential properties to the south should however be omitted as this is not justified or consistent with the approved scheme. Public benefits from development at the site such as the contribution to housing, affordable housing and delivery of infrastructure and open space justifies tall buildings across the site. The site is in a Tall Building Zone; further control over the arrangement of tall buildings across the site is not justified. The requirement to maximise the provision of family homes is also an unnecessary inclusion within the site allocation as any development at the site will have regard to Policy S.H1 which requires a mix of unit sizes to meet local need. In summary, the site allocation should be amended as set out below: +++SEE REP FOR TABLE AS DOES NOT COPY PROPERLY+++				
829908	Andrew Wood		LP61	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 52	No	Effective			The map is now several years out of date What is shown as blue dock space is now filled in with land Buildings have been built which are not shown	Yes		The boundary will be amended to reflect the approved scheme. This will be discussed at the examination in public.

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				:Wood Wharf								
624580	Jason Larkin	Canary Wharf Group Plc	LP547	PART 4: DELIVERING SUSTAINAB LE PLACES, Figure 52 :Wood Wharf	No	Justifi ed; Effect ive			Based on a detailed review of the Draft Local Plan and associated documents and evidence base, a number of recommendations are made below to ensure the Draft Local Plan can be considered sound. 5.2. To amend the Secondary POL boundary in relation to Wood Wharf to capture only the parts of the Wood Wharf masterplan that are expected to be delivered as predominantly office or for other CAZ strategic function (see proposed Secondary POL boundary at Appendix A). 5.3. Notwithstanding the physical boundary of the Secondary POL, in order for the Draft Local Plan to be considered sound, the proposed definition of 'greater weight' and land use split referenced in draft Policy S.EMP1 must be justified, with suitable alternatives considered. We suggest that the criteria for POL should be revised in line with the guidance set out in the CAZ SPG and NPPF to avoid limiting the delivery of sites in the Secondary POL. 5.4. In accordance with the POLBR, the Local Plan should refer to feasibility and other factors that may require a more flexible approach towards alternative land uses within Secondary POL locations. 5.5. We suggest that the Primary POL designation boundary does not include any part of Water Square and instead reflects the commercial core of Canary Wharf. For the avoidance of doubt, the table titled 'Designated Employment Locations' within proposed Policy S.EMP1 should confirm that the location of the Primary Preferred Office Location (POL) is 'As illustrated on the Policies Map' rather than stating 'Canary Wharf'. 5.7. The promotion to support Canary Wharf as a metropolitan centre is welcomed and should be reinforced where appropriate throughout the Draft Local Plan. 5.8. We recommend that the proposed Wood Wharf Site Allocation (4.13) should: 1. Reflect the approved, committed and on-going redevelopment of the Wood Wharf site pursuant to the OPP wherever possible. This will ensure that the Draft Local Plan is up to date, realistic, justified and effective. An introduction to the site allocation to explain the on-going Wood Wharf development should be provided to inform any lay readers. 2. The proposed allocation shouldn't refer to specific employment formats or occupiers of office space to ensure the delivery of employment uses is not unnecessarily compromised. 3. The recommended amendments to the Design Principles set out in Paragraph 4.34 of this note should be considered. 4. It should be clear whether the continued viable operation of any existing or proposed Idea Store or Public Presence Facility may be effected by the delivery of any other similar facilities within the Borough – in particular that which is referred to in			The proposed Secondary POL boundary will not be amended in relation to Attachment 8a and 8b given that these boundaries are based on evidence set out in the Employment Land Review (2016) and the Preferred Office Local Boundary Review (2017). However, it is considered that the proposed amendments to Policy S.EMP1 - to ensure that schemes are considered/ negotiated on a site by site basis - will address any concerns on this issue in relation to Wood Wharf. A minor modification is suggested to add the POL designation to the land use requirements for North Quay site allocation as follows: <ul style="list-style-type: none"> • Employment: comprehensive mixed use development within the preferred office location (secondary) to provide town centre uses including small-to-medium enterprises and large floorplate offices <p>The Council considers it is not necessary to acknowledge the on-going redevelopment of the site. The delivery considerations section makes it clear that the idea store will be monitored alongside the development of the Crossharbour town centre to ensure the needs of communities are met in the most appropriate manner.</p>

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									respect of Wood Wharf. 5. The indicative Wood Wharf Plan (Figure 52) supplementing the site allocation should reflect the approved, committed and on-going redevelopment of the Wood Wharf site pursuant to the OPP wherever possible. In particular, the suggestion set out in Paragraph 4.37 of this note should be considered. Please refer to accompanying Attachment 8 of the Canary Wharf Group Representations			
1142656	Rabina Khan		LP540	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 52 :Wood Wharf	No	Positively prepared; Justified; Effective			The illustration is not accurate for Wood Wharf. The sections in blue are currently in the process of construction i.e. foundations have been laid. The water section has currently had an extended section (concrete slab) ready to build on top.			The boundary will be amended to reflect the approved scheme. This will be discussed at the examination in public.
1142985	Transport for London (TfL)	Transport For London	LP760	PART 4: DELIVERING SUSTAINABLE PLACES, Figure 52 :Wood Wharf	N/A			▪ The site will provide new bridges and infrastructure that enable east – west movement, including importantly for bus services. This is not mentioned.				Figure 52 will be amended to show the location of bridges.
1142661	Abdul Basit		LP556	PART 5: MONITORING AND DELIVERY, Chapter 4: Infrastructure delivery	N/A			There is clearly a major funding gap on infrastructure which the council needs to address via this local plan				As identified in chapter 2 of the Infrastructure Delivery Plan (IDP), the council is acutely aware of the funding deficit which we are always looking to address through exploring and attracting external opportunities/investment to fund the delivery of infrastructure projects. Please note that funding gaps are a part of the process when planning for infrastructure on a fifteen year timescale. Typically, secured funding applies to short term projects in a five year timeframe.
1142844	Ahmed Hussain	Alpha Grove Freeholders Association	LP657	PART 5: MONITORING AND DELIVERY, Chapter 4: Infrastructure delivery	No				Finance – the funding gap not considered which makes a plan unviable: Both the Local Plan Infrastructure Plan October 2017 and the GLA Opportunity Area Planning Framework (OAPF) Development Infrastructure Funding Study (draft July 2017) clearly show a large funding gap required to pay for new infrastructure. Total cost of infrastructure Funding Gap Local Plan 15 year Tower Hamlets £1,900 million £648 million OAPF DIFS Medium 25 year Isle of Dogs & South Poplar £1,186 million £245 million The Local Plan is encouraging further development in areas where there is insufficient social infrastructure. New social infrastructure will be required. This is more expensive than expanding existing facilities; however, there is not enough money to pay for that new infrastructure. The plan should identify where and how it can raise this fund to make the plan sound. By failing to identify the gap the “Local Plan” becomes unsound	Yes		As identified in chapter 2 of the Infrastructure Delivery Plan (IDP), the council is acutely aware of the funding deficit which we are always looking to address through exploring and attracting external opportunities/investment to fund the delivery of infrastructure projects. Please note that funding gaps are a part of the process when planning for infrastructure on a fifteen year timescale. Typically, secured funding applies to short term projects in a five year timeframe.

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1049340	Ruth Bravery		LP831	PART 5: MONITORING AND DELIVERY, Chapter 4: Infrastructure delivery	No	Effective			The plan fails to set out a suitable overall integrated timescale for when infrastructure developments must be implemented before certain levels of further residential development takes place. Without this, and because the plan leaves so much to chance, the Isle of Dogs will face another 20 year period where lots of people move in but there is no public infrastructure to meet their needs. History is about to repeat itself. People will live in daily misery for years if proper attention is not paid to the timing of development. Poor timing will mean that once all the homes are built and everyone is squashed in, the roads will all be dug up whilst the infrastructure is "retrofitted". Without such a timetable included in the plan, the plan is not the right one from options available and will not result in sustainable development.	Yes		The role of the Infrastructure Delivery Plan (IDP) is to summarise the detailed information provided by Service Areas from across the council (such as education, health etc.), all of which have a comprehensive understanding of infrastructure need and timing to ensure that new growth is well-supported by infrastructure. At present the IDP provides high level information on the current supply and forecasted future demand. The level of information on timing and phasing of infrastructure projects within the IDP is currently being reviewed. The evidence base that feeds into the IDP currently is reviewed on a biannual basis in order for it to be able to adapt to any changes in infrastructure need and therefore allowing any changes to the information on projects to be made easily.
1053844	Samantha Powell	Department for Education & Skills	LP617	PART 5: MONITORING AND DELIVERY, Chapter 4: Infrastructure delivery					<p>4. It is requested that the site of the Former Metropolitan University (FMU) building at 41-47 Commercial Road be allocated for a mixed-use development that comprises a new all-through school and housing.</p> <p>5. The site is in education (D1) use and is now owned by the Department for Education (DfE) with the intention to deliver a new school over the next 3 years. A new school opening in the area has been approved by the Secretary of State for Education – named as the Livingstone Academy East London.</p> <p>6. The Council recognises this school in its Infrastructure Delivery Plan (IDP) (LBTH, October 2017) and in the LBTH Planning for School Places – 2017/2018 Review. There is a need for 6FE at primary level across the LBTH area as well as a new secondary school.</p> <p>7. The requested allocation of the site therefore meets the government's objectives and those of the local planning authority, which needs to provide for additional school places over the next 10-15 years. The allocation of the site would sit within the delivery timeframe of the Local Plan. Significant discussions have been held with the Council and the GLA, and a planning application is to be submitted shortly.</p> <p>8. The property is controlled by the ESFA and funds are available to bring the project forward – being deliverable is an important aspect in terms of a Local Plan allocation as well as being relevant to the soundness of the plan.</p> <p>9. The site can accommodate a school for 1,570 pupils as well as up to 75 flats. The site is highly accessible, within the Central Activities Zone and suitable for regeneration to a high density. The site lies within LBTH Education Areas 5 and 6. There are no Free</p>			Comments noted. We will not be considering this site as a site allocation as it does not meet the requirement to deliver at least 500 homes.

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									Schools with primary provision within these areas. As highlighted in the previous Reg 18 rep, national planning policies for state funded schools confirm that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities (NPPF para 72). 'Choice' is a key objective and the NPPF states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement. 10. The DfE's approval for the Livingstone Academy recognised that it would serve Tower Hamlets and other London boroughs and potentially be delivered in a building on this site. It was recognised that Tower Hamlets was an ideal location for this type of Academy, being a multi-cultural and highly aspirational area. The Academy will focus on STEAM subjects (science, technology, engineering, arts and maths). 11. The Local Plan identifies the need for secondary school provision and primary provision. The positive allocation of this site within the Local Plan will assist meeting this need within the Local Plan timeframe.			
829908	Andrew Wood		LP70	Part 6: Appendices , Appendix 3: Parking standards	No	Positively prepared			There are some parts of LBTH with very low PTAL levels and yet we may wish to encourage retail or restaurants in those locations which are not viable with no parking. For example on the river Thames is a Thai restaurant near Ferry Street with an outside car park. With no car parking it would not be viable as a business despite location. That forces all restaurants to gather in areas of high density i.e. Canary Wharf which will have higher rents and service charges again impacting viability. Some flexibility should be built into areas where PTAL is 3 or below.	Yes		Comment noted but appendix 3 sets out parking standards which do permit car parking within leisure and entertainment uses/developments. The Local Plan is seeking to create mixed and diverse neighbourhoods that are walkable and have good access to public transport and town centres in line with the principles of good growth.

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1142985	Transport for London (TfL)	Transport For London		PART 3: POLICIES, 11.14 Paragraph			What are "planned improvements" and what is "further investment" is not clearly identified. Section 11.14 lists a number of interventions, though it isn't clear if they are the former or the latter. With ref to section 3.1, the boxed text states that "a significant step-change in future capacity is required" though it isn't clear what this is additional to - only that planned/under way projects include Elizabeth line and improvements to LU (Central, Jubilee), DLR and river services (and additional river crossings).				<p>Comments noted. All policy and supporting text is supported by evidence as set out in the Strategic Transport Assessment. Further clarification will be provided in relation to planned improvements and further infrastructure that is needed.</p> <p>Proposed changes are outlined below.</p> <p>Paragraph 11.14:</p> <p>We will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough. The list below sets out a number of planned interventions (see figure 18) that are required to support the borough's transport network, including(79):</p> <p>Insert the below text after paragraph 1 in paragraph 3.1:</p> <p>Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages).</p> <p>Multiple projects are also underway or planned to improve the public transport network across the borough, including the new Elizabeth line, improvements to the London Underground (e.g. Central and Jubilee lines) and Docklands Light Railway, improved river services and additional river crossings. However, Even with these capacity increases, future demand is forecast to outstrip supply over the plan period. Consequently, a and further investment-significant step change in future capacity is will be required above that already planned. Tower Hamlets is expected to experience continued job gains and strong employment growth over the period to 2031 (in excess of London and national averages).</p>