

Our Borough, Our Plan

December 2015



A New Local Plan First Steps

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Foreword

The development of our new Local Plan is taking place at an important moment. As the centre of London continues to move East, Tower Hamlets is now one of the fastest growing boroughs in the UK. This is reflected in our growing population, the increasing level of development interest and the rising value of our local economy. While this growth brings great opportunities by increasing local investment, new jobs and improvements to facilities, it also creates an increasing demand for housing, and business space and places pressure on local services. National Policy changes, to welfare, housing and planning, as well as global economic trends, are also adding further stresses which are being felt in the borough.

All this is within the context of a borough which still faces huge challenges. Our employment rate is rising but still below London's, we have the highest rate of child poverty in the country and high levels of health inequality. The affordability of housing continues to present a significant challenge, reducing the ability of residents with a range of incomes to remain in the borough. Many residents are concerned about

the pace of change and the scale of recent developments. I believe it is crucial that we ensure new developments are accompanied by the additional infrastructure and services required to maintain a good quality of life. It is also vital that we protect and enhance the elements of our borough which contribute to its unique identity, be that heritage buildings, local pubs, community facilities and faith buildings, local business spaces or markets.

I am committed to ensuring that more residents benefit from the growth in the borough, such as through improved services or access to housing that is actually affordable and meets local needs. The borough's physical regeneration however can only be one part of the picture; we need to ensure that residents receive access to training and job opportunities, so we can reduce poverty and inequality.

It is a very important that we meet existing and historic needs. But we are welcoming many thousands of new residents every year and so we need both to support existing communities and to welcome the new East Enders and to plan for and provide for their needs too. This includes public

infrastructure – schools, health services and so on - but also making sure that our new developments work well, include leisure opportunities and open space, handle waste effectively, are supported by transport systems, are served by well-planned shops and other services and are planned and designed in ways that are efficient and sustainable. Our Borough can manage high density development in quite a few places, but it must be development that ‘works’, and doesn’t store up problems in the future from poor design or inadequate services. And so, to re-emphasise this crucial point, getting growth right is vital for our future.

An up to date Local Plan with policies which reflect the real needs of local residents and businesses, and which addresses the latest national and regional context, is crucial for the borough to make the most of the opportunities available, help tackle our enduring challenges, manage the

pressures we face and deliver our aspirations.

The “Our Borough, Our Plan: A New Local Plan First Steps” consultation is the starting point for the development of the new Local Plan, which will be adopted by autumn 2017. This document and consultation are designed to help shape the direction of policy, so I would urge everyone with an interest in Tower Hamlets to voice your views. In doing so, we will meet the needs of the borough going forward, with a shared vision that we can all be proud of.

A handwritten signature in black ink, appearing to read 'John Biggs', with a stylized flourish at the end.

John Biggs
Mayor of Tower Hamlets

About this document

What is this document about?

In this document we have started to consider what the spatial vision, planning strategy and policies for Tower Hamlets should be over the next 15 years. These will be set out in a new Local Plan, which will guide development, identify how land is used and shape our neighbourhoods by determining what will be built and where.

This is the first consultation stage for the preparation of a new Local Plan. It aims to identify the challenges for the borough and how we can best approach these through our planning policies.

Your input is an invaluable part of the preparation process for the new Local Plan and will inform the development of a vision, objectives and policies to help create a better Tower Hamlets.

The document asks questions to help capture your views. Please feel free to comment on any other issues you feel are important or relevant to planning policy and whether we should include any other policy areas in the next stage. This document should begin to address the following questions, which will be taken forward in more detail in the development of policies in the new Local Plan:

What does planning policy need to address as a priority?

What is the most important thing about your local area?

Our growing neighbourhood really needs a new park and a new school. Will the policies plan for this?

How should we approach our policies to ensure positive outcomes for those living, working and visiting the borough?

What can a Local Plan do to help me and my children continue to afford to live in the Borough?

We keep getting more and more new development but don't appear to be getting major infrastructure investment to support it. What is the Local Plan going to do about it?

I'm worried about the pace of growth, it seems out of control to me. What will a Local Plan do to manage this?

What are the challenges for your local area?

How to give us your comments and feedback

London Borough of Tower Hamlets is undertaking public consultation on this document and its supporting information from:

14 December 2015 to 8 February 2016

You will be able to find all information on this consultation on the council's website:
www.towerhamlets.gov.uk/localplan

Please contact the Plan Making team for further details via:

E: planmaking@towerhamlets.gov.uk (please enter "Our Borough, Our Plan consultation" in the subject)

T: 020 7364 5009

Twitter: @TowerHamletsNow

The council would like to encourage the use of our **e-form** for electronic responses. The form will be published on the council's website (as shown above).

Any written comments should be sent to the following freepost address:

FREEPOST
Our Borough, Our Plan Consultation
D&R Strategic Planning
London Borough of Tower Hamlets
PO BOX 55739
London
E14 1BY

Hard copies are also available in Tower Hamlets libraries and Idea Stores listed below:

- **Idea Store Bow**, 1 Gladstone Place, Roman Road, Bow, E3 5ES
- **Idea Store Canary Wharf**, Churchill Place, E14 5RB
- **Idea Store Chrisp Street**, 1 Vesey Path East India Dock Road, E14 6BT
- **Idea Store Whitechapel**, 321 Whitechapel Road, E1 1BU
- **Idea Store Watney Market**, Watney Market, E1 2FB
- **Cubitt Town Library**, Strattondale Street, E14 3HG
- **Local History & Archives Library**, 277 Bancroft Road, E1 4DQ
- **Bethnal Green Library Cambridge Heath Rd**, London E2 0HL

Consultation Event Calendar

This consultation will be supported by a series of public drop-in sessions taking place at various locations around the borough. Please refer to the calendar below for the date and time of an event taking place near you.

Date	Location	Time	Address
Thursday 14 th January 2016	Idea Store, Crisp Street	11:30-14:30	15 Market Square, London, E14 6AQ
Saturday 16 th January 2016	V & A Museum of Childhood, Bethnal Green	10:00-13:00	Cambridge Heath Road, London E2 9PA
Thursday 21 st January 2016	Alpha Grove Community Centre	17:30-20:30	Alpha Grove, London, E14 8LH
Thursday 28 th January 2016	Idea Store, Whitechapel	17:30-20:30	321 Whitechapel Road, London, E1 1BU
Saturday 30 th January 2016	Idea Store, Bow	10:00-13:00	1 Gladstone Place, Roman Road, London, E3 5ES

Section One: Setting the Scene

1.1 What is the Local Plan?

The new Local Plan will set out a vision, strategic priorities and a planning policy framework to guide and manage development in the borough for the next 10 to 15 years, in line with the planning policy requirements set out by national and regional government.

1.2 Why is it important to have a Local Plan?

It is important for the borough to have an up to date plan in place with a clear vision, objectives and planning policies to guide development decisions. Together with the London Plan, the Local Plan is a critical tool for a planning authority to plan proactively and positively for development by focusing on the community needs and opportunities in relation to places, housing, economy, infrastructure, local services and other areas. It also seeks to safeguard the environment, adapt to climate change and enhance the natural and historic environment.

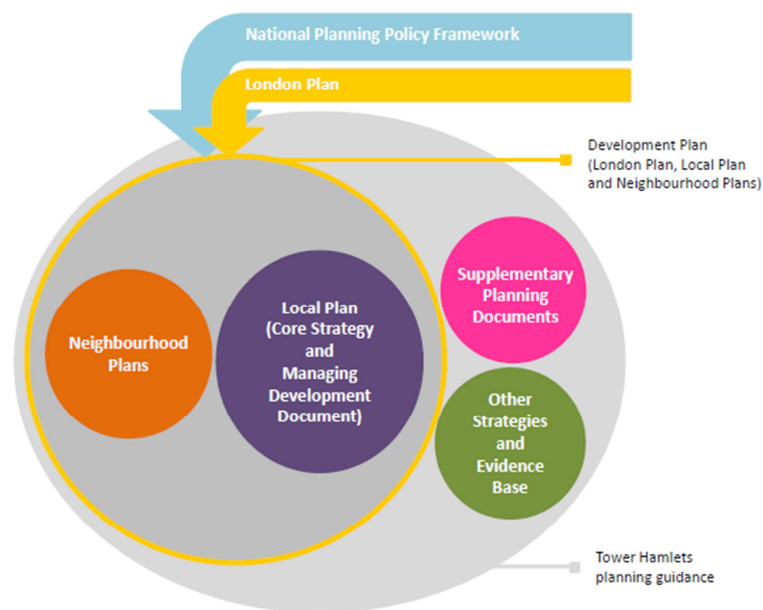


Figure 1 Framework of the Tower Hamlets Local Plan

1.3 Why do we need a new Local Plan for Tower Hamlets?

There are a number of main reasons for the council to prepare a new Local Plan, including:

- Since the adoption of the Core Strategy (2010) and Managing Development Plan Document (2013), Tower Hamlets has experienced

significant changes, in particular, continued population growth and increasing demand for homes, jobs and infrastructure. Information from the Greater London Authority (GLA) showed that the population of Tower Hamlets was 280,474 in June 2014, and expected to increase by 23 per cent to reach 364,804 by 2024¹. The borough has a relatively young working age population, with almost half of all residents of the Borough (49 per cent) aged between 20 and 39. Tower Hamlets is the fourth largest employment location in London with 240,000 jobs based in the Borough in 2012. The Greater London Authority (GLA) estimates that the number of jobs in the borough will increase by 169,000 between 2010 and 2031.

- Significant planning changes have also taken place in recent years at both a national and regional level. Amongst others, this includes the National Planning Policy Framework (2012) and Planning Practice Guidance, the Localism Act and the Community Infrastructure Levy (CIL) from the Government. The London Plan has also been further altered to provide new policy directions for London boroughs to follow. The Further Alterations to the London Plan was adopted in March 2015 (FALP)². The Mayor of London has increased Tower Hamlets minimum ten year housing target from 28,850 to 39,314. The new housing target means that the borough will potentially accommodate 10 per cent of London's population growth in just 1.3 per cent of its land area³. There will also be a 41 per cent increase in jobs⁴.
- These combined changes will have significant implications for the council's planning policies, in particular the need to plan for sufficient additional infrastructure to support the increasing population. The council is proactively responding to these changes by preparing a new Local Plan that, when adopted by autumn 2017 will replace the current Core Strategy (2010) and Managing Development Document (2013). This will help ensure that the needs of the borough residents can continue to be met through the provision of affordable housing, jobs, community facilities and infrastructure.

1.4 How will we prepare this new Local Plan?

The preparation of the London Borough of Tower Hamlets new Local Plan is regarded as a priority for the council and the Mayor, as set out in the Community Plan 2015.

¹ 2014 Round of Demographic Projections; Local authority population projections - SHLAA-based ethnic group projections, Capped Household Size, short-term migration scenario; October 2015

² <https://www.london.gov.uk/priorities/planning/london-plan/further-alterations-to-the-london-plan>

³ The estimated figures were represented on behalf of the Council during the Examination in Public of the Further Alterations to the London Plan in 2014.

⁴ The estimated figures were presented on behalf of the Council during the Examination in Public of the Further Alterations to the London Plan in 2014.

The council is working hard to make the best use of resources to produce the new Local Plan for adoption by autumn 2017. A summary of the indicative Local Plan preparation timetable is set out below (Table 1).

Milestone	Indicative Date
First engagement and consultation	Winter 2015/2016
Preparing the Draft Local Plan	Spring - Summer 2016
Draft Local Plan formal consultation	Autumn 2016
Amending the Draft Local Plan for Submission	Winter 2016
Publication of the Local Plan for Submission	Winter 2016 - Spring 2017
Preparing the Local Plan for Submission	Spring 2017
Submission to the Secretary of State	Spring 2017
Examination by a Planning Inspector	Spring/Summer 2017
Adoption by Full Council	Autumn 2017

Table 1 Local Plan Production Indicative Timetable

Following the preparation of the Local Plan, the council must submit it to the Government for examination. As part of this examination, an independent planning inspector will assess the Local Plan and consider:

- Whether the plan has been prepared in accordance with the Duty to Cooperate⁵;
- Legal and procedural requirements; and
- Whether it is sound – positively prepared, justified, effective and consistent with national policy.

A number of key factors contributing to preparation of a Local Plan are included in the diagram below (figure 2).

⁵ A legal duty on planning authorities in England and public bodies to engage constructively and actively and on an on-going basis to maximise the effectiveness of preparation in the context of strategic cross boundary matters.



Figure 2 The components that are the most relevant to the preparation of a Local Plan

Section Two: New Plan, New Vision

2.0 Introduction

A core part of a Local Plan is its “Vision”. Good practice suggests that a “Vision” should be both aspirational and realistic. It should provide a strong impression of what the borough will spatially be like in the next 10 to 15 years. In developing this vision, we need to establish a better understanding of the current context of the borough in terms of social, economic and environmental aspects, as well as the challenges and opportunities Tower Hamlets faces.

This section helps us to think ahead - what Tower Hamlets will be like in 10 to 15 years. It also provides an overview of the borough profile in respect of its place, people and economy through highlighting the challenges that the borough faces, opportunities for development, and how best we can achieve shared objectives amongst our community. These challenges and opportunities largely reflect the content in the Tower Hamlets Partnership’s Community Plan (2015), which is part of the evidence base for developing a new vision for the Local Plan.

2.1 Our borough – place, people and economy

Place

Tower Hamlets is an inner city borough which shares boundaries with the City of London and the London Boroughs of Newham and Hackney. The east side of Tower Hamlets is bordered by River Lea, and part of the borough is now in the planning authority remit of the London Legacy Development Corporation (LLDC). The River Thames flows along the south of the borough separating it from the Royal Borough of Greenwich and the London Borough of Southwark (See figure 3 below).

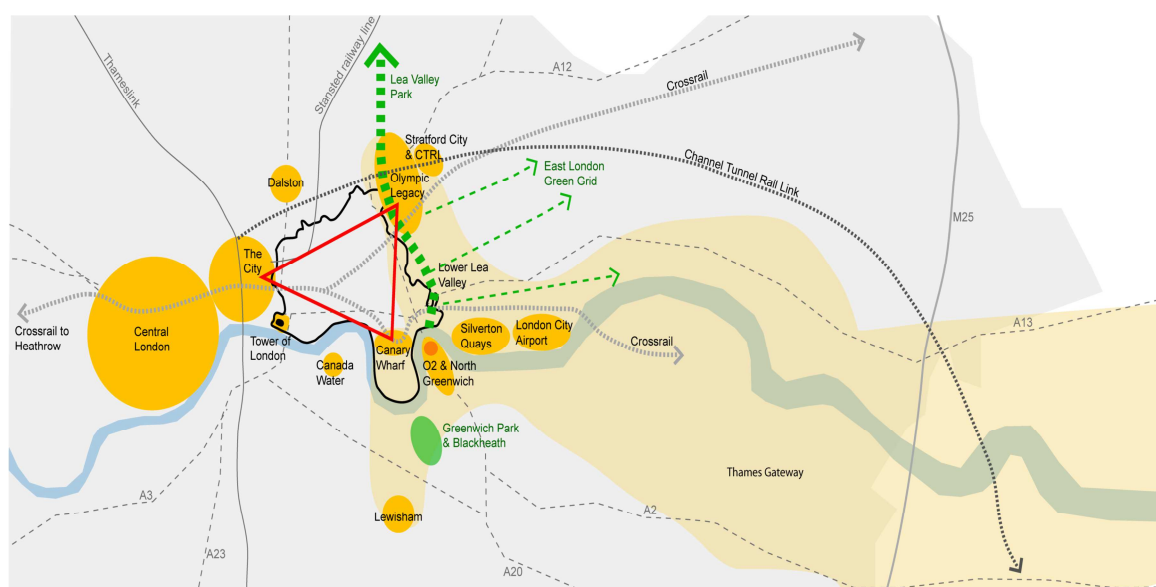


Figure 3 Tower Hamlets Regional Role

Figure 4 (below) illustrates that Tower Hamlets is made up of places with distinct and unique characteristics, from the major international business centres of Canary Wharf and parts of the City Fringe, to residential areas with traditional East End character such as Bow and Stepney, historic Whitechapel, and vibrant Shoreditch. Alongside these places are major leisure attractions and landmarks such as Brick Lane, Spitalfields Market, the Tower of London and Victoria Park.

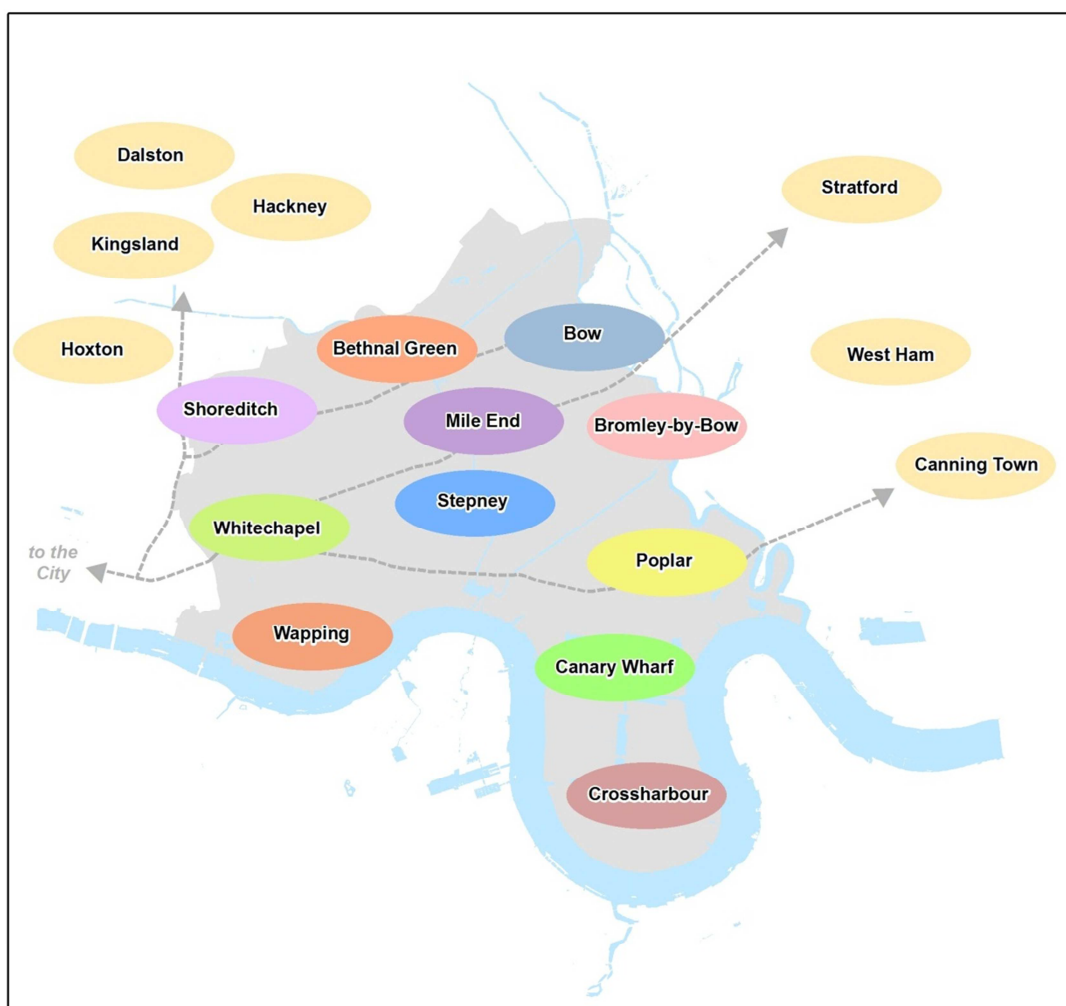


Figure 4 Some of Tower Hamlets Distinct Places

People

The population of Tower Hamlets was estimated to be 284,000 as at June 2014. Tower Hamlets has a relatively young working age population, with almost half of all residents in the borough (49 per cent) aged between 20 and 39⁶.

According to the 2011 Census, 69 per cent of the borough's population are from a minority ethnic community. In the last decade international migration has shaped the profile of the borough's communities – 43 per cent of the borough's population were born outside of the UK.

⁶ The Office for National Statistics published its mid-2014 population estimates on 25 June 2015. The mid-year estimates are the 'official' estimates of population for local authority areas.

Economy

Tower Hamlets has one of the most dynamic economies in the country. 11,440 local businesses provide approximately 251,000 jobs in the borough. Our economy is being driven by the continued growth in financial and business services and by 2030 there are expected to be a further 75,000 jobs in that sector.⁷ The City Fringe/ Whitechapel and Canary Wharf/Isle of Dogs area accounted for the majority of all employment in Tower Hamlets⁸. According to VAT registrations, there are 11,445 VAT based enterprises in Tower Hamlets in 2013. Of these, the majority of businesses (10,145) are micro businesses employing less than 10 people.

Furthermore, the borough also attracts hundreds of visitors to key attractions such as the Tower of London and Whitechapel Gallery and the hotel industry is responding to increased demand for visitor accommodation.

2.2 What are we planning for?

Table 2 below provides a summary of the emerging trends, pressure and likely outcomes in terms of social, economic and environmental aspects in the next 10 -15 years. This is based on information available at this stage although some areas will be difficult to predict and will require further evidence to be produced as the Local Plan evolves.

Our Population will be...	Our Economy will be...
<ul style="list-style-type: none"> • The borough's population is projected to increase from 280,474 in 2014 to 364,804 in 2024, an increase of 23 per cent(ONS).⁹ • The greatest increases will be amongst the older working age population, the 'White' population and the 'hyper diversity'¹⁰ of the borough. • The borough's employment rate has been rising rapidly. However higher than average levels of unemployment remain amongst some groups of residents and in-work poverty remains. In light of the changing housing market and welfare provision, this trend is likely to continue in certain places within the borough. • The last ten years has seen a reduction in the percentage of residents living in social rented accommodation, a small level of growth in owner occupation and large growth in the private rented sector. This trend is likely to continue. • The borough is likely to become more polarised between an increasingly wealthy home owning or renting group and a reducing group of residents in affordable housing or subsidised. 	<ul style="list-style-type: none"> • Employment projections published by the GLA estimate the number of jobs in the borough will almost double, increasing by 169,000, between 2010 and 2031 to 379,000. • The changing global economy, emerging employment sectors and working trends, including the rise of remote working and self-employment, will have an impact on the type of employment spaces and facilities required in the borough. • Population and retail trends, including growing online shopping and smaller chain convenience stores are changing the use and role of Town Centres. • Town centres are increasingly moving away from only providing retail spaces to delivering spaces for leisure and cultural activities as well as service provision. • The changing shape of development in the borough will also influence the nature and location of our Town Centres, for example, creating opportunities for new Town Centres in

⁷ Tower Hamlets Borough Profile (draft, 2015)

⁸ Business registration and employment survey (BRES) data published by the Office for National Statistics (ONS).

⁹ 2014 Round of Demographic Projections; Local authority population projections - SHLAA-based ethnic group projections, Capped Household Size, short-term migration scenario; October 2015

¹⁰ the borough will be home to more residents from many more different countries, than is currently the case

	emerging growth areas.
<p>Our Infrastructure will be...</p> <ul style="list-style-type: none"> • The borough’s transport infrastructure will be boosted by the arrival of Crossrail in 2018. However population growth and development will place further pressure on the borough’s other transport network, including buses, DLR, walking and cycling. • There will be an increasing need for leisure, social, education infrastructure and reducing space to provide it. New delivery models and locations will be required. • Many public sector services are seeking to merge services and reduce the number of buildings they operate from. This means even less available publicly owned sites for infrastructure provision. • The education system has also changed following the introduction of Free Schools and Academies, which follows a different system for their establishment. • Neighbourhood Planning has been introduced under Government legislation. This has enabled more detailed planning at neighbourhood level led by designated Neighbourhood Forums. An adopted Neighbourhood Plan will become part of the local planning system to determine planning applications within the designated Neighbourhood Areas. 	<p>Our Environment will be...</p> <ul style="list-style-type: none"> • The borough has seen a consistently high level of development interest since the production of the last Local Plan. This is likely to continue as the population and economy grow in Tower Hamlets and London. • The current high values of residential development mean that other land uses, including employment space, community facilities and open space, will become even more difficult to secure and deliver and come under increasing pressure for conversion to housing. • More development will come forward on smaller and and/or constrained sites, leading to a denser borough. • There will be increasing pressure to regenerate and intensify developments. • The location of development and borough orientation will change. The new Housing Zone and Opportunity Area means that development space is being opened up on the eastern boundary of the borough, an area which is currently poorly connected. • The borough already has the third highest carbon emission levels, due to vehicular emissions. This is likely to worsen unless mitigating action is taken. • Increasing development will also impact on the quality of the borough’s built and natural environment.

Table 2 A summary of the Future Population, Economy, Infrastructure and Environment Trends

2.3 The challenges we face

Story so far...

Infrastructure provision

Population growth will demand more homes and jobs and will significantly impact on existing social and physical infrastructure, including schools, healthcare and open spaces and leisure facilities as well as less visible but very important infrastructure such as utilities and telecommunications. It is important that the council establishes a better understanding of infrastructure needs and prioritise them where required. The existing mechanism is struggling to fill the infrastructure funding gap, given the increasing needs. It has become more challenging for the council to deliver infrastructure through other innovative approaches.

Quality of the environment

Higher density developments have come forward in less accessible locations outside of town centres, creating a landscape which does not reflect the historic and prevailing pattern of buildings and spaces. While high density developments offer the opportunity to optimise the use of a site, their siting and design needs to be carefully managed to ensure that it has regard to the surrounding context, in particular the historic and environmental assets which make Tower Hamlets unique.

Streets and public realm in parts of the borough are sometimes disconnected and of poor quality. The lack of consistency contributes to a poor visual appearance of the streetscape in general.

Supply and cost of housing

Tower Hamlets continues to be a place where people want to live but there is a limited supply of homes and prices are high. The cost of housing is increasing and the borough is likely to become more polarised between those on higher and lower incomes, further increasing inequalities in our local communities. We want to make sure that the new homes are built in the right locations are of a high design quality and are affordable for local people.

Economy and improving job opportunities

The local economy is getting stronger but there is a need to ensure we have the right skills within the working population to enable residents to access the range of job opportunities in the borough and beyond.

Transport capacity and connectivity

The borough's transport network will come under greater pressure with the projected rise in people living, working and visiting the borough. As a result of its strategic location, Tower Hamlets is developing more characteristics of a central London borough. However, there is a need to ensure we better connect with neighbouring boroughs, especially to the east, as well as ensure internal connections are improved.

Health and well-being

Tower Hamlets has one of the largest health inequality gaps in the country and has one of the highest rates in London of people suffering bad or very bad health.

Social cohesion

The changing nature of the borough through the scale and type development taking place requires positive and proactive management to ensure we create diverse and balanced neighbourhoods which bring communities together.

2.4 The opportunities we have

Story so far...

Opportunity areas

The London Plan (2015) identifies a number of opportunity areas within Tower Hamlets - namely City Fringe/Tech City (including Whitechapel), Isle of Dogs and South Poplar, and Lower Lea Valley (including part of the Olympic Legacy area and the Poplar Riverside Housing Zone). These areas present an opportunity to optimise the supply of available land to enable the development of homes, jobs and required infrastructure for all Tower Hamlets communities. Details are set out in 2.5 below.

Infrastructure delivery

The anticipated level of development coming forward in the borough will be supported by developer contributions in the form of planning obligations and Community Infrastructure Levy (CIL). These are mechanisms which will enable the delivery of required infrastructure in the areas of need in a timely manner. The facilities and services needed to support Tower Hamlets' communities includes, but is not limited to, transport, education, health, open space and telecommunications.

Thriving economy and town centres

Tower Hamlets has a strong economy and is home to a number of international and national companies, who continue to invest in the borough. There is also an established and growing small and medium sized enterprise (SME)/microbusiness sector, and new tech industries attracted to the City Fringe/Whitechapel area in particular. This is also supported by a hierarchy of interconnected, vibrant and inclusive town centres of local economic activity with good transport accessibility and a mix of uses.

To ensure local residents have access to job opportunities, it is a priority to equip local residents with the skills and qualifications to benefit from this growth through setting policy requirements for training and identifying sites for potential training and education facilities. There is also an opportunity to ensure our town centres continue to be vibrant and diverse to meet the needs of the growing population.

Crossrail

Public transport accessibility in the borough will be further enhanced by the new Crossrail Stations at Whitechapel and Canary Wharf, which are scheduled to open in 2018. Crossrail will shorten journey times between these stations and a number of other major growth areas including Bond Street, Stratford City, City Airport, and Heathrow. This has significant implications for both national and international business, and will attract inward investment, more jobs, and development opportunities in the Whitechapel and Canary Wharf areas.

Cross boundary opportunities

Tower Hamlets interfaces with the London Legacy Development Corporation (LLDC) (the planning authority for Fish Island and Bromley-by-Bow), the London Borough of Hackney, London Borough of Newham and the City of London. These boroughs have development opportunities, such as Stratford International, and London City Airport, the benefits of which Tower Hamlets can harness for its communities, by way of improving connectivity and accessibility to these areas.

2.5 Designated Opportunity Areas

Figure 5 shows the proximity of these designated Opportunity Areas and how they link with Tower Hamlets town centres and other neighbouring boroughs. The locations of designated Opportunity Areas (Number 1-3) are indicative for illustration purposes. Details of these Opportunity Areas are set out in the separate plans and guidance by GLA. The potential connections (in purple) such as new footbridges and tunnels illustrated in the map are aspirational at this stage. It aims to provide a strategic overview of how Tower Hamlets should consider maximising the growth opportunities by linking better with its surroundings.

Area 1: City Fringe/Tech City

The City Fringe area of Tower Hamlets, including Tech City, is emerging as one of London's most significant areas for economic growth, containing considerable opportunities for new and emerging sectors of the economy with particular requirements for clustering and accommodation. The council's Whitechapel Vision Masterplan Supplementary Planning Document (SPD) (2013) is driving forward regeneration in Whitechapel including new homes and job opportunities, public realm improvements, a new civic hub for Tower Hamlets and potential Med City focused on the Royal London Hospital and Queen Mary University London.

Area 2: Isle of Dogs and South Poplar

The Isle of Dogs and South Poplar has been identified as an Opportunity Area by the Mayor of London in the London Plan to potentially accommodate a minimum of 10,000 new homes and 110,000 jobs. The Greater London Authority (GLA) is producing an Opportunity Area Planning Framework (OAPF) Supplementary Planning Guidance (SPG) to provide more detailed planning policies for the area. This will help manage growth coming forward in advance of the new Local Plan being adopted in 2017. The OAPF will also be a material consideration that the new Local Plan will need to take into account.

The first draft of the OAPF SPG is scheduled for public consultation in spring 2016 and the GLA is working with the council, partners and key stakeholders in the production of this document. The council has asked the GLA to prioritise work on the Development Infrastructure Funding (DIF). The DIF is a key piece of evidence that supports the OAPF and the GLA's plans for growth, and demonstrates how the GLA and partners will manage growth in the area through this strategic infrastructure plan and committed investment. Normally a final DIF is published when the OAPF is complete, which is anticipated to be late 2016. However because of the importance of infrastructure and the scale of potential growth in this area, the council has asked the GLA to prioritise this work and publish the complete DIF in spring 2016. The council is working proactively with the GLA, TfL and other key stakeholders in the production of the OAPF and the new Local Plan.

The council adopted the South Quay Masterplan SPD in October 2015 that provides additional design guidance to help coordinate new developments in the South Quay

area. This will be part of the evidence to inform the development of the OAPF and the new Local Plan.

Area 3: Lower Lea Valley/Poplar Riverside Housing Zone

The Lower Lea Valley Opportunity Area covers three London Boroughs: Hackney, Newham and Tower Hamlets. Within Tower Hamlets, it comprises the areas of Hackney Wick/Fish Island, Bromley-by-Bow and Poplar Riverside Housing Zone. The LLDC is the planning authority to determine planning applications within Hackney Wick/Fish Island and the Olympic Legacy Area.

The Olympic Legacy has been a catalyst attracting development opportunities and investment. Through the Local Plan and other supporting documents such as the adopted the Bromley-by-Bow Masterplan SPD (2012), the council has identified a vision and planning guidance to promote affordable housing, jobs and social infrastructure for local communities in the area.

More recently, the Poplar Riverside Housing Zone is an initiative of the GLA to drive forward growth located on the redevelopment of former industrial land and existing social housing estates. It is estimated that the Housing Zone could deliver more than 9,000 new homes over the next 10 years. This will require the council to work collaboratively with the GLA and other key stakeholders to ensure that additional schools, community centres and spaces are planned at an early stage of development proposals in order to meet the needs of all communities.

London Borough of Tower Hamlets Aspirations






Figure 5 Map of Aspirational Opportunities for Tower Hamlets

2.6 Suggestions

With your input, we propose to create a new vision for the Local Plan by applying the following principles:

1. The vision should be concise and easy to understand
2. The vision should reflect council and community priorities
3. The vision should acknowledge the challenges and opportunities Tower Hamlets faces
4. The vision should describe places in Tower Hamlets, and provide a clear sense of what the place will be like in 10-15 years' time
5. The vision should be underpinned by a number of objectives which are measurable

2.7 Let us know what you think

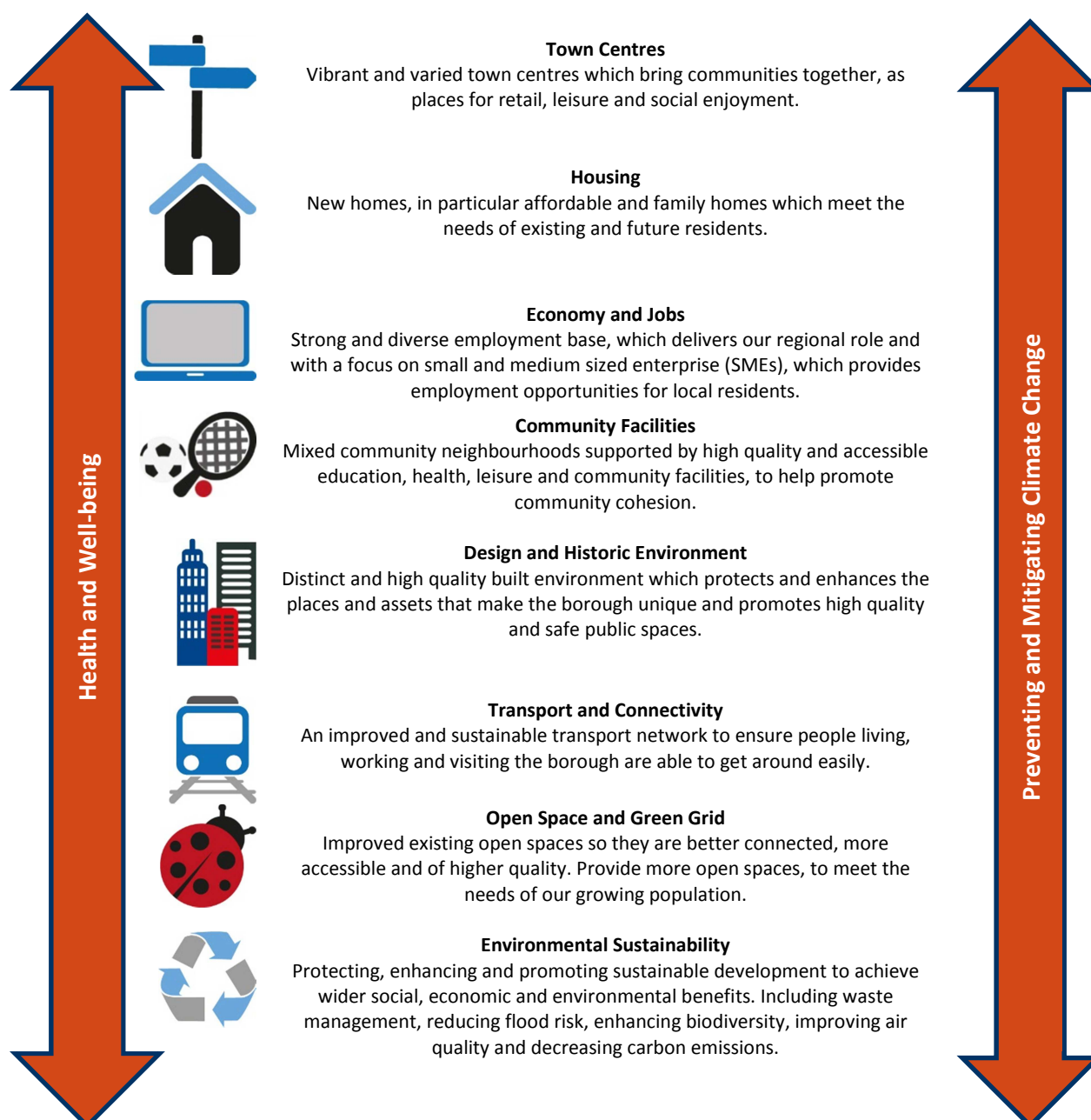
-  **Do you agree with the key challenges and opportunities for the area you live, work or visit in Tower Hamlets?**
-  **Do you agree with the principles stated in 2.6 above?**
-  **What are the most important things that the Local Plan vision needs to include?**

Section Three: Topics

3.0 Introduction

The production of a Local Plan should be undertaken in a way in which promotes fairness, community cohesion, empowerment and resilience in line with the principles set out in the Community Plan 2015. To deliver this, a series of key topics have been identified in this section.

Our Policy Aims:



We considered that there are two cross cutting themes running through all eight topics and they are set out below. These will need to be taken into account when we are developing all Local Plan policies.

- **Improving residents health and well-being**

This topic goes beyond improving access to health facilities and includes a range of measures to improve the wider determinants of health, including employment, high quality housing, and access to open space and leisure facilities.

- **Preventing and mitigating climate change**

This topic requires policy interventions across all topics, from promoting low carbon transport, to improving the energy efficiency of homes to incorporating flood reducing design.

Town Centres



3.1 Town Centres

Story so far...

The Council's strategic policy approach towards "refocusing" on the borough's town centres has been reinforced more recently by London Plan policies directing appropriate higher density development, including residential development, to town centres and transport nodes. While such development helps to ensure town centres remain as focal points, facilitating residential uses can also compromise active retail, leisure and commercial uses including provision of appropriately sized units.

The borough has an excellent range of shopping areas containing a selection of local businesses and national and international chains. These not only meet the everyday convenience needs of the borough's residents and workers, but also provide a unique experience for local people, Londoners and tourists alike. The vibrancy of traditional street markets, the internationally renowned Brick Lane, the specialist independent shops of Columbia Road and its flower market and the multi-national chains of Canary Wharf attract many people to the borough.

However, in addition to managing pressure for residential development and densification of our town centres, there is a need to respond to changing consumer behaviour and emerging demands. Overall vacancy levels across our town centres have improved in recent years but there is a disparity in the performance between individual centres. Current planning policies underpin Council initiatives to support town centres, but new legislation, including a relaxation of permitted development rights, has impacted on their effectiveness. Furthermore, the protection of small local shops serving immediate convenience needs outside of our town centres has become more difficult.

We need to ensure our policies are more responsive to changes at all levels and reflect future needs and demands including responding to areas of the borough where growth is most intense.

What we know

- Uses within our town centres
Tower Hamlets town centres form part of the borough's distinct identity and character. These places act as anchors for local areas, with a mix of uses and activities that draw our borough's diverse communities together. Increasingly, town centres are being used for leisure purposes (such as for eating, drinking and socialising) and as hubs for essential social and community facilities such as Idea

Stores and health centres. This is a move away from the traditional role as destinations offering predominantly shopping facilities.

The London Plan (GLA, 2015) encourages such non-retail uses within town centres, citing arts, culture, leisure and the night-time economy in particular. With high need and demand for housing across London the Mayor of London also considers some of our town centres as a potential source of accommodating new homes. The London Plan suggests “there is scope to redevelop or convert redundant offices or under-used space above shops into more active uses, especially housing.”

The borough has a number of successful street markets but future development and upgrading of transport infrastructure, including enhancing cycle routes, could negatively impact on them. Evidence shows that markets enhance the vitality of town centres and can support the development of new enterprises. It may be necessary to review current policies to ensure that markets are supported and protected where necessary. There may also be opportunities to encourage new markets in the borough.

It is important to promote town centres as places of employment, supporting the retention and upgrading of existing space and encouraging additional floorspace for small and medium-sized enterprises (SMEs) and low threshold enterprise space¹¹ (LTES) through redevelopment.

In contrast, some uses can have negative impacts on the vitality and attractiveness of town centres, especially where clusters of similar businesses have emerged. These include hot-food takeaways, betting shops and payday loan shops. New legislative changes make it easier to control betting shops and payday loan shops than was previously the case. The council’s Community Plan (2015) also seeks to limit the impact of what are deemed ‘unhealthy uses’ in the borough.

Therefore, we must consider how our policies accommodate a wide range of uses to support our town centres to ensure they are future-proofed for continued vitality and viability. In addition, we will also need to consider how good design will contribute to town centre vitality in terms of providing high quality public space which does not attract anti-social behaviour or crime.

- Changing nature of retail in our town centres

The borough’s population is growing and the nature of residents, workers and visitors is evolving. Changes within the retail industry and the convenience of online shopping have altered the role and function of town centres in the borough, resulting in some centres under-performing.

¹¹ This is the lower value non-residential space found in and around town centres (GLA, 2014). You will be able to view the relevant document via the link:

<https://www.london.gov.uk/sites/default/files/Accommodating%20Growth%20in%20Town%20Centres.pdf>

The most recent retail vacancy rates according to our Town Centre Survey show a borough average vacancy rate of 9.1 per cent, which is better than the national average but worse than the London average. Some town centres such as Brick Lane and Roman Road East have vacancy rates above the borough average but have shown improvement in recent years following the implementation of targeted strategies. Future policies will need to provide a basis for continuing recent improvements by supporting such interventions.

Emerging areas of population growth within the borough, such as within Opportunity Areas, also present a chance to create or re-designate town centres to meet the needs of local people.

- General Permitted Development Order (GPDO)¹²
New legislative changes through the General Permitted Development Order (GPDO) make it possible for shops to be converted to other uses such as estate agencies, restaurants and offices without the need to apply for planning permission. These changes potentially undermine the council's existing policies on retail and town centre uses and its ability to control the diversity of uses. The conversion of B1 office space to residential use through permitted development may further impact on the vitality and vibrancy of the borough's town centres in non-exemption areas¹³.
- Changing development pressures
Large supermarket chains have scaled back expansion of superstores and instead now favour smaller local-format convenience supermarkets. Although the Council has successfully defended refusals of planning applications for new out-of-town-centre convenience supermarkets at appeal, the borough's policies directing 'anchor' uses to designated town centres are likely to come under increasing pressure.

¹² <http://planningguidance.planningportal.gov.uk/blog/guidance/when-is-permission-required/what-are-permitted-development-rights/>

¹³ The government has designated exemption areas from office to residential permitted development rights so that supply of employment space for office use will be protected in key locations, including the Central Activity Zone CAZ/Tech City and north Isle of Dogs. Details can be seen via the link:

<http://www.london.gov.uk/priorities/planning/permitted-development-rights-for-change-of-use-from-commercial>

Suggestions

1. Update the existing local evidence base for town centres, which could include:
 - A revised Tower Hamlets Town Centre Health Check survey (based on the 2013 London Town Centre Health Check) to provide a ‘snapshot’ of health of our town centres in terms of occupied retail and leisure floorspace, vacancy levels etc.
 - A new Town Centre Retail and Leisure Capacity Assessment (based on the existing study produced in 2009) to ascertain needs for new floorspace, or identify existing overcapacity.
 - Further investigation into the impact of the GPDO on Tower Hamlets town centres.
 - Further investigation into optimum unit sizes in town centres

2. Work with other teams within the Council and our partners to create individual visions and strategies for our town centres to:
 - Consider introducing more stringent policies to restrict uses such as betting shops, payday loan shops and hot food takeaways, especially where there are existing concentrations.
 - Consider revising the current position on protecting ‘A1’ retail uses as a priority to give greater flexibility where ‘non-A1’ uses are proposed that will positively increase the diversity of uses within town centres and/or support the reinvigoration of under-performing town centres.
 - Consider protecting successful centres and support diversification of uses or alternative policy approaches where there is excess capacity, in order to manage vacancy rates.
 - Consider designating new town centres or re-designate existing town centres higher or lower in our hierarchy. This will also be underpinned by reviewing existing town centre boundaries and ensuring the type and mix of uses are appropriate to support the needs of existing and future communities.
 - Consider identifying and designating ‘Local Parades’ as a new layer of our town centre hierarchy to enhance the existing policy to prevent the loss of local shops.
 - Seek to ensure that units are of adequate size and quality to support the needs of a range of town centre uses
 - Review existing policy position for street markets based on an updated Street Market Strategy.

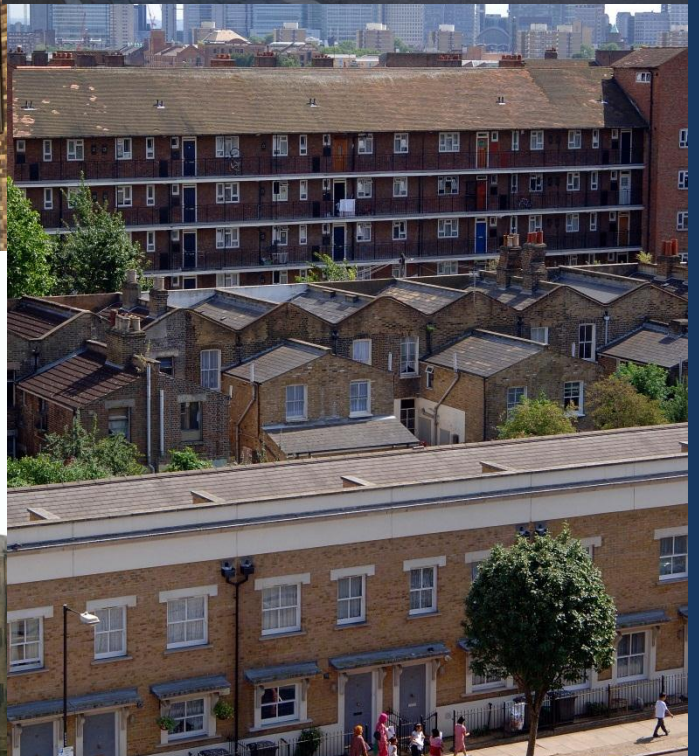
Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Housing



3.2 Housing

Story so far...

Over the last 10 years, Tower Hamlets has experienced the fastest population growth in London and the borough has continued to transition from its industrial heritage to become a more attractive place for living. The delivery of housing in the borough is required, not only to respond to local need, but also to fulfil the borough's statutory duty to co-operate with neighbouring boroughs and meet the housing need, policies and targets established by the Greater London Authority (GLA) in the London Plan.

Tower Hamlets is expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025. The borough's ability to supply land for housing in these quantities is becoming increasingly limited as a significant proportion of our available sites have already been developed. Land also needs to be secured to support the delivery of new infrastructure, such as schools, open spaces, health centres and transport links to create sustainable communities.

The delivery of housing is one of the biggest challenges for the Local Plan, not only in terms of land availability and meeting London Plan targets, but also in terms of meeting local need for different tenures and unit types. The appropriate design and form of housing also needs to be addressed to ensure appropriate densities and the quality of housing. (Density and housing quality are discussed in section 3.5 Design and the Historic Environment). Like most of the other inner London and central London boroughs, Tower Hamlets' land values continued to rise over the last ten years. This has in part been driven by high levels of property investment, particularly by foreign investors. This has led to concern that some of this new housing is either empty or infrequently used, leading to increased prices and demand. This has made delivery of affordable housing even more challenging. At national level, the challenge of delivering housing to meet local need is exacerbated by a constantly evolving legislative framework.

The draft Welfare Reform and Work Bill and the draft Housing and Planning Bill will impact on our ability to meet housing need through limiting access to affordable housing and the delivery of affordable housing within the borough. It is also the case that the definition of affordable housing, which is set nationally as a percentage of local market rent, results in rental levels which are not considered 'affordable' to many of those in need of housing. This is a particular concern for families and is one of the main reasons for people moving out of the borough (Community Plan, 2015).

As well as affordable housing, we are also required to consider provision for older people, key workers, students, vulnerable people and gypsies and travellers. We also have high levels of overcrowding which results in above average demand for larger homes in comparison with other boroughs in London.

The new Local Plan will need to respond to these challenges and make sure our policies can help deliver a wide variety of high quality homes suitable for the borough's existing and future households in terms of their size, income and the particular support needs of diverse individual households.

What we know

- London Plan housing targets

The London Plan (2015) establishes a minimum housing delivery target for all London boroughs. The target for Tower Hamlets has increased by more than 35 per cent for 2015 – 2025 (3,931 units per annum) compared to the previous London Plan (2011) target (2,885 units per annum). The 2015 target represents a minimum and boroughs are expected to exceed the target in their Local Plans.

The council has raised strong concerns with the Mayor of London that the higher housing target was set without giving adequate consideration to the borough's infrastructure capacity and constraints. The sustainable delivery of housing requirements of the London Plan (2015) is a major challenge for the borough and we will continue to voice these concerns with the Mayor of London. The council also has a statutory duty to cooperate and engage with neighbouring authorities on cross boundary or strategic matters such as housing in the production of the Local Plan.

- Infrastructure planning to support housing for communities

Linked to the concern expressed above, the council acknowledges the existing infrastructure shortfalls and the need for a more comprehensive understanding of the borough's social and physical infrastructure demands to support current and future communities. The council needs to undertake exercises to establish how much development will take place in the borough over the next 10-15 years. This can help match estimated housing numbers and population growth across the borough with the services and infrastructure provision required to support sustainable growth.

- Location of housing

It is anticipated that the majority of housing delivery will be taking place in the designated Opportunity Areas in the Housing Zone and the Isle of Dogs and South Poplar; and in the City Fringe and Whitechapel. The delivery of housing in these locations is informed and supported by the collaborative work between the council and other key stakeholders, in particular the GLA.

- Loss of affordable housing contribution from development

The borough has a significant need for affordable housing. The existing planning policy requires 35 per cent to 50 per cent of all new development for 10 units and above. However, legislation enables applicants to negotiate their affordable housing contributions during the planning application stage. The development industry has utilised viability tools to demonstrate that development proposals presented cannot deliver the planning policy requirements, and still remain viable and deliverable. This often results in planning applications with lower affordable housing rates that our policy requirements.

- Meeting diverse housing needs within the borough

National legislation places a responsibility on our new Local Plan to meet the market and affordable housing needs of our local residents and to support London's need for more homes through new development. Our overall housing target is set out in the London Plan (2015). This target is supported by a piece of evidence called the London Strategic Housing Market Assessment (SHMA). To support new Local Plans, local planning authorities are expected to build on this evidence with their own local level SHMA, which provides a more detailed picture of the particular housing needs in the local areas. Together this local SHMA and the council's Housing Strategy can consider the needs of specific groups in the borough such as students, people with disabilities, older and vulnerable people, key workers, and gypsies and travellers. The council is also aware that key workers including nurses and teachers find it difficult to live in the borough, given the increasing property prices.
- Housing affordability

Currently, local indicators show that 38 per cent of affordable housing stock in the borough is owned and managed by the council and Housing Associations. There is a shortfall in affordable homes provision, with over 19,000 households on the housing waiting lists, over half of which require family sized accommodation (three bed and above). Local evidence suggests the need for a much higher percentage of the borough's housing stock to be affordable, than is currently delivered.

This need is expected to be exacerbated by an expected extension of the 'Right to Buy' to housing association tenants as set out in the draft Housing and Planning Bill which will result in the loss of affordable housing stock. This loss will come about as a result of sales of Housing Association homes and the associated proposal that councils sell high value council homes that become empty to pay for the scheme. Although provision will be made for one for one replacement of Housing Association homes sold under the scheme, it is indicated that they do not necessarily have to be of the same tenure or in the same area.

In addition, the recent publication of the draft Housing and Planning Bill indicates that a proportion of homes on new schemes will be 'Starter Homes' for sale at 80 per cent of market to first time buyers under 40 years of age. These homes will be counted as affordable homes but the council considers that such provision will further limit the council's ability to deliver 'real affordable housing' to meet our community's needs.

The delivery of intermediate housing (including shared ownership) continues to pose challenges, particularly on larger properties in high value areas within the borough. Residents in Tower Hamlets would need to be earning the top end of the permitted intermediate income level (£71,000 for one or two-bed; £85,000 for three-bed and above) in order to be able to afford shared ownership properties, unless the public subsidy is increased substantially. Under the current market conditions, the objective that the council should seek to ensure that the intermediate housing product is provided for households within the full range of incomes below the upper limit is increasingly difficult to achieve. The Local Plan should be realistic about intermediate

housing in relation to affordability, and think further about the definition of affordable housing relating to local circumstances alongside development viability.

The council will work with relevant stakeholders as part of the Local Plan process to address these issues. Tower Hamlets is committed to maximising the delivery of housing that is affordable to local people and will continue to secure funding for this purpose.

- Diversifying housing stock: Private Rented Sector (PRS) and self-build

Local indicators already suggest that the borough requires a lot more social rented housing than market housing or intermediate affordable housing. It also suggests that the market for 'intermediate' housing is being met through the growth in the Private Rented Sector (PRS). The borough is experiencing an increase in the proportion of units in the PRS with around 40 per cent of all homes now let out privately.

This coincides with a new policy requirement within the London Plan (2015) to support the contribution of new purpose-built PRS, or redeveloped for rent, normally by an institution or management company within the private sector to individuals. The benefits of this form of PRS include a financing mechanism which can incentivise building of new units and give tenants a greater degree of security in their tenancy, a professional accountable management service and consistent quality. The borough has granted planning permission for such provision to support housing options for residents to remain in the borough for the longer term, contributing to community cohesion.

The draft Housing and Planning Bill introduces new duties on Local Authorities to promote custom and self-build homes. The Local Plan will need to be informed by an understanding of what role these forms of housing play in helping to address housing needs and housing delivery in the borough.

Suggestions

1. Update the Strategic Housing Market Assessment (SHMA) in light of the latest legislation and guidance e.g. the role of self-build and custom build, starter homes and brownfield land.
2. Identify the need for a new evidence base, where appropriate, to consider:
 - Housing affordability
 - Affordable housing viability
 - Housing typologies: this could consider appropriate building types for:
 - mixed uses within developments
 - low cost home ownership
 - self-build and community land trusts
 - family housing
 - housing for older people
 - high density housing
 - special needs housing including for vulnerable homeless persons
 - The need for further gypsy and traveller accommodation.
 - The impact of foreign investment in new housing and empty homes
3. Review the existing Local Plan policies for the delivery of market and affordable housing based on evidence base.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

Economy and Jobs



3.3 Economy and Jobs

Story so far...

Tower Hamlets has a thriving economy with increasing employment rates and a diverse employment sector. Our employment rate is below the London average but our economy is ranked as one of the most dynamic in the country. Some of the biggest international financial and business services companies are concentrated in Canary Wharf and the City Fringe. There are emerging new employment opportunities in Whitechapel, as part of the Whitechapel Vision regeneration project, and as part of the expansion of knowledge-based digital companies around 'Tech City' in Shoreditch. The majority of businesses registered in Tower Hamlets are microbusinesses employing less than 10 staff.

However, the borough faces challenges in dealing with high and persistent levels of unemployment in certain groups, particularly amongst women. And there are indications that local people are not necessarily benefitting from the high concentration of jobs in the borough due to a mismatch in skills.

The Council's policies aim to protect employment land against loss to competing land uses, in particular housing, as these are areas that can accommodate future jobs and provide training opportunities for residents. Nevertheless, our policy position might be threatened by government policy interventions, in particular the change of rules allowing the conversion of offices into new homes without planning permission under permitted development rights. The results of increasing rental values in certain locations have made it more difficult to accommodate the need for affordable workspace.

A key part of the new Local Plan must be to respond to these challenges by identifying what employment areas we want to continue to protect in light of the changing legislation, and also consider how we can ensure that SMEs are able to find suitable and affordable premises to enable them to stay in the borough.

What we know

- Protecting our employment land - Offices
There has been pressure to allow residential developments in our Preferred Office Locations (POL), including Aldgate and Canary Wharf. The evidence base that we commission will need to consider what the demand for large floorplate offices is likely to be in the future, and how we might need to respond to a growing demand for different types of office space that reflects changing work patterns.

- General Permitted Development Order (GPDO)

In May 2013 the Government introduced permitted development rights allowing the change of use of buildings currently or most recently in office use, to residential use, without the need to apply for planning permission, for a period of three years. The City Fringe, Whitechapel and Canary Wharf areas are currently exempted from these permitted development rights, but they apply to the rest of the borough. Since the introduction of the new permitted development rights the council has received a total of 10 proposals for converting office use (B1) into new homes (C3) through the prior approval process. Amongst these proposals, the largest application would involve the creation of over 400 new dwelling units in an occupied office building in a locally designated office location (LOL).

The government has recently announced that these permitted development rights will be made permanent after May 2016. The exemption areas are only expected to remain in place until May 2019. We need to fully understand the possible implications of this on the future availability of employment land in the borough, and whether there may be a need to consider alternative means of protection of employment areas such as Article 4 directions (that remove specified permitted development rights in certain areas).

- Protecting our employment land - Industrial

A significant amount of industrial land has been released for other uses since 2010; much of this is now within the boundary of the London Legacy Development Corporation (LLDC) in Hackney Wick/Fish Island. The London Plan requires us to keep safeguarding the Strategic Industrial Locations (SIL) in the borough to make sure we protect the supply of land for so-called “dirty uses” in inner London areas, including for the management of waste. However, we know that there may be a falling demand for land for industrial uses in inner London, and that there are businesses occupying premises the Tower Hamlets SILs that do not reflect the original intention of these designations. This means that sites in these areas have become under-used and may not fulfil their potential, in terms of providing affordable workspaces and jobs for local people.

- Supporting affordable workspaces

Microbusinesses employing less than 10 people represent the vast majority of businesses in Tower Hamlets (88.6 per cent)¹⁴. It is the SME sector that is most likely to continue to provide employment for local people. We need to ensure there are adequate workspaces available to accommodate SMEs, including start-up and scale-up businesses, and that they are flexible, adaptable and affordable, to encourage these businesses remain in the borough.

As prices rise and there is pressure to convert land and buildings to other uses such as housing, it can become difficult for existing and new businesses and entrepreneurs to find the right premises that they can afford. The borough is particularly keen to explore opportunities to support the provision of shared space

¹⁴ Borough Profile Research Briefing 2013-11 – Tower Hamlets Business Structure, December 2013

to support SMEs through planning policies, to enable them to operate in the borough on an affordable and flexible basis.

In addition to floorspace, there are other elements contributing to the delivery of affordable workspace. This includes specifications for the units and broadband connection. The Mayor of London has considered digital connectivity as one of most important infrastructure elements for London. It plays an important role in productivity of business. According to research from Broadband Hotspots¹⁵, a large part of Tower Hamlets is falling into the no or poor connectivity zone.

Suggestions

1. Update the existing local evidence base for employment and jobs, which could include:

- An updated Employment Land Review (ELR) to understand how much employment space has been gained and lost in the borough since the last Local Plan was produced, as well as anticipated future supply and demand. This will inform the strategic direction of our employment policies in the new Local Plan, including how we take forward our employment designations (POL, SIL, LIL and LOL). The evidence base that we commission will need to consider what the demand for large floorplate offices is likely to be in the future, and how we might need to respond to a growing demand for different types of office space that reflects changing work patterns.

2. Review our existing policies in light of the evidence base findings to:

- Consider strengthening our existing employment policies to ensure that we protect existing office floorspace, and that the right kind of new floorspace is being delivered in the suitable and appropriate locations to meet current and emerging market demand.
- Consider introducing a new policy to support the provision of affordable workspace for local businesses and entrepreneurs.
- Consider updating policies to carefully manage the remaining industrial land in the Borough in line with the London Plan, and to ensure that job opportunities in these areas are intensified and that we identify adequate land for industrial uses, including for waste management.

¹⁵ Source: broadband-notspot.org.uk (self-reported distribution of slow broadband connections)

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Community Facilities



3.4 Community Facilities

This section covers:

- Education and Life Long Skills
- Health facilities
- Idea Stores and libraries
- Sports and leisure centres
- Other community and social facilities such as community halls, places of worship, pubs and youth centres

Story so far...

Tower Hamlets has a range of valued health, leisure, social and community facilities.

Our schools are amongst the best performing inner-city schools in London and we are home to universities that attract students from around the world. Our Idea Stores have received wide national and international acclaim. Our sports and leisure centres are well-used, capitalising on the legacy of the London Olympics in 2012. The borough's hospitals such as The Royal London play an essential role in providing care for those across London and beyond, and on a local scale improved medical centres have been delivered in recent years such as the 'XXPlace' Health Centre in Mile End. The borough is home to a number of historic and significant faith buildings representing a range of denominations. The borough's pubs not only serve their local communities, but attract custom from across a wide area because of their character and heritage.

However, the borough's increasing population and housing targets place a strain on the capacity of existing community infrastructure. While the current Local Plan has successfully delivered new facilities such as a secondary school at Bow Locks and an Idea Store at Watney Market, more new facilities are required. At the same time, with the high value of land in the borough and demand for housing in particular, existing facilities have come under increasing pressure from development.

Tower Hamlets has a vibrant arts scene, with a host of festivals, family and community events, and activities for young and old, and cultural events for all. There is an opportunity to further enhance the boroughs arts and culture facilities through new development.

3.4.1 Education and Life Long Skills

What we know

- Demand for new school facilities to meet population growth

In order to meet the London Plan housing targets, there will be increased pressure on the borough to deliver enough new school places to meet demand. Schools have already been delivered in some areas such as Bromley-by-Bow and Stepney. New areas of intense population growth have emerged (such as Poplar Riverside, the Isle of Dogs and South Poplar and Whitechapel) and it is the council's intention to identify possible new sites for schools, as part of its strategic planning.

However, this process has been made more challenging because there is less and less land available to develop and it is increasingly difficult to secure new sites for schools because of the increasing value of land, particular for residential development.

The demand for new schools can also be met through Free Schools, which are delivered outside of the council's remit. National legislation allows new Free Schools to operate in more restricted sites and buildings, with less play space, than is allowed for Local Authority schools. Free Schools often use public open space and leisure facilities to ensure pupils have access to leisure and play facilities. The new Local Plan provides an opportunity to consider whether new policies could help this need for play and leisure space to be met, in addition to residents' needs.

The allocation of sites for new schools is considered as part of the Local Plan preparation. The proposed methodology for this exercise will be explained in section 'Infrastructure, Delivery and Monitoring'.

- Supporting Early Years through childcare facilities

The current Local Plan makes reference only to the provision of Children's Centres, to support the under-fives. It does not consider the borough's need for additional types of Early Years provision, such as childcare facilities. While national planning policy does not require the council to plan for these facilities, the authority has a statutory duty to provide disadvantaged two year olds with fifteen hours of free childcare per week for thirty-eight weeks per year and this will be expanded to thirty hours of free childcare for three and four year olds in September 2017. The council is currently not meeting its target for places, in part due to difficulties in securing locations for new childcare facilities. The new Local Plan provides an opportunity to consider how our planning policies can help to support the need for different forms of Early Years provision.

- Enhancing the skills of residents

Although Tower Hamlets is one of the largest employment locations in London, only about one fifth of jobs in the borough are filled by residents, and around 20 per cent of all employment in the borough is based in the 'low pay' sector (LBTH, 2014). There

is a need to diversify employment, particularly to match the skills of existing residents with highly skilled jobs created within the borough. This could be achieved by supporting small to medium firms and local entrepreneurs. The Community Plan 2015 seeks to generate more apprenticeships, traineeships and other opportunities for young people, develop skills provision for adults and increase the number of employment opportunities for disabled residents. Funding for such opportunities might be facilitated through planning obligations linked to new development.

- Protection and creation of further, higher and adult education facilities
Increasing development pressure for residential schemes is likely to put pressure on existing accredited further, higher and adult educational facilities. Currently, applicants for development proposals are not required to submit supporting information to justify the loss of educational facilities other than schools. We will review this policy position to ensure that facilities for the development of the education and skills of residents are retained.

The council's current policy position supports the creation of further, higher and adult education facilities. With competition for available land, it is important that the borough continues to attract accredited facilities that help to address the borough specific education and skills needs. The new Local Plan provides an opportunity to review existing evidence to make sure our policy is working as well as effectively as possible.

Suggestions

1. Update the existing local evidence base for educational facilities, utilising new and existing evidence through an Infrastructure Delivery Plan. The Plan should incorporate findings from professionals within the relevant specialisms.
2. Review our existing policies in light of the above supported by new evidence, to:
 - Establish the current and future requirements for school places and identify new areas of search for new or expanded schools. This in turn will inform revised policy and requirements of new and existing Site Allocations.
 - Consider introducing new policies to encourage and manage a range of early years provision (ages 0-4) to ensure that the needs of all young people and their guardians are met throughout the Borough and existing facilities are protected.
 - Consider introducing new policies to protect existing non-school educational facilities (such as colleges, universities and adult training centres) from unnecessary loss to ensure that a range of opportunities for learning and skills are available.
 - Consider developing a stronger policy for skills and training by linking it with other policy areas such as town centres, employment and delivery policies in order to enhance the available evidence base to secure planning contributions.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

3.4.2 Health, Leisure and Social Facilities

What we know

- New community facilities to meet population growth
The increase in the borough's housing target (GLA, 2015) means that provision of new community infrastructure, which includes health centres, Idea Stores, sports and leisure centres, places of worship and other community and social facilities serving the needs of the community are going to be further stressed by the increasing needs of the borough's future population. Although some facilities identified previously have been delivered or are under construction, such as Idea Store Watney Market and a swimming facility and sports hall at Poplar Baths, there is a need to ensure we provide community infrastructure to meet the needs of existing and future residents.

As part of the new Local Plan preparation, the council will aim to identify possible new sites for community facilities (in particular for health, Idea Stores and leisure facilities) as part of strategic planning. The allocation of sites for community facilities is considered as part of the site allocation process in the section on: 'Infrastructure, Delivery and Monitoring'.

- Health facilities
A growing population means that there is a need for new facilities or additional capacity within existing facilities. Tower Hamlets Vanguard programme is developing new models of care, its vision is that partners will work together to deliver innovative, integrated and seamless care to patients, carers and families. The Programme is being led by the Tower Hamlets Integrated Provider Partnership (which includes the council), in partnership with NHS Tower Hamlets Clinical Commissioning Group (CCG). As an integral part of this, an extensive exercise is underway to assess both the health needs from different groups in the borough together with potential impact of new methods of service delivery, to determine the number, size and type of facilities required to deliver care in Tower Hamlets.

The council is also aware that the NHS is under pressure to make efficient use of their estates which could result in merged facilities and land being sold for alternative use, as has happened with the London Chest Hospital site.

- Idea Stores/Libraries
There are areas of the borough with a lack of provision of Idea Stores or libraries within walking distance. Additional demand for Idea Stores will also be created by a

growing population. Therefore, the new Local Plan will need to consider potential locations for new or enhanced Idea Stores or libraries.

- Sports & leisure centres

Such facilities are currently directed to town centres as these are generally the most accessible and contribute towards the vitality and viability of town centres. However, due to size requirements town centres may not be able to accommodate these uses. In order to provide new facilities to meet communities' needs, the council may need to consider allowing these facilities to locate out-of-town-centre in exceptional circumstances.

- Decline of the borough's pubs

There has been concern at the decline in public houses (pubs) in the borough. Research has found that 134 pubs have closed in the borough since 2000, a net loss of 52 per cent. Pubs are classed as community facilities in our current Local Plan. The GLA (2015) require boroughs to bring forward policies to protect pubs. This gives Tower Hamlets an opportunity to strengthen its policies and evidence requirements in order to protect these facilities from unnecessary loss.

- Protection and creation of existing community and social facilities, including places of worship

The London Plan encourages boroughs to optimise the use of land and promotes redevelopment of brownfield land. In doing so, redevelopment may include the loss of existing community and social facilities for other financially higher value uses, such as housing. Policies on these facilities will need to be carefully managed to ensure they are effective in preventing unnecessary loss.

In addition, a growing population means that there is a need to improve the existing facilities and create new ones. The Local Plan needs to respond to the population change and identify possible sites to allocate these uses as part of the plan making process.

Suggestions

1. Work with partners within and outside of the council to update the existing local evidence base for community facilities, or align future Local Plan policies to recent existing evidence.
2. Review our existing policies in light of the above, and supported by new evidence, to:
 - Incorporate findings from a new Council Leisure Strategy and needs assessment and an updated Joint Needs Assessment
 - Establish the current and future requirements for community facilities (in particular, Idea Stores, health and leisure facilities) and identify new areas of search for new or expanded facilities. This in turn will inform revised policy and requirements.
 - Consider whether we can strengthen our policy protection of pubs.
 - Consider allowing new community facilities to locate out-of-town-centre in exceptional circumstances and where the role of town centres would not be undermined.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Design and Historic Environment



3.5 Design and Historic Environment

Story so far...

The borough has a unique history and a rich character that has evolved over many years. It is also growing rapidly; the skyline is changing and new forms of development are transforming the ways in which we live and work. The current Local Plan has positively influenced these changes, helping to deliver attractive new development and preserve and enhance our built heritage. However, continued growth is placing unprecedented demands on our built environment. Tower Hamlets is now the second most densely populated borough in London, and a population that continues to grow will further increase population densities.

There are concerns that the types of development coming forward in response to these demands will not produce the best outcomes for the future of the borough, and are not representing the most sustainable way for the residents of Tower Hamlets to live and work. Some development proposals have far exceeded the optimum density ranges set by the London Plan. While this is allowed in exceptional circumstances there is concern that these exceptions may become the norm, particularly in the London Plan's identified Opportunity Areas. In addition, many of these exceptions have been built outside the borough's areas for intensification such as town centres, which has a negative impact on the distinct character and identity of Tower Hamlets. With the rising land values and continuing pressure on delivering housing, there is concern that the amount and pace of change will irreparably damage the borough's distinct character, identity and heritage assets and settings.

In developing the new Local Plan it will be important to ask if the ways that planning policy has helped shape the design of new development in the past, will continue to deliver the best outcomes in such a rapidly changing and growing borough. The plan will also need to ensure that new forms of development not only serve the housing and development needs of current and future Tower Hamlets communities, but do so in a sustainable way that also respects the very things that make Tower Hamlets so unique and that is our distinct character, identity and heritage.

3.5.1 Design

What we know

- Level of development and density

The borough is experiencing increasing demand for growth and rising land values, particularly in relation to residential land uses. This is resulting in increasingly intensive levels of development coming forward. The London Plan requires our Local Plan to identify opportunities for development. In particular, it promotes optimising

land in designated Opportunity Areas (the Isle of Dogs, City Fringe and Lower Lea Valley), town centres and areas with good public transport accessibility. However, these areas cover a large proportion of the borough and there is concern that Tower Hamlets could become overdeveloped with a sea of high-rises, and lacking variety of built form and loss of its distinctive characteristics.

In addition to the level of development coming forward, national and regional policies allow higher development densities in exceptional circumstances, which are sometimes beyond what is recognised to be the most suitable density ranges. However, the council is concerned that these exceptions are becoming increasingly common and could have unsustainable and unacceptable negative effects on Tower Hamlets' communities and distinct character, identity and heritage. In many cases, the current intensive level of development in the borough has resulted in tall buildings in excess of 15 storeys coming forward outside our preferred town centre hierarchy locations, together with residential densities that are far in excess of the upper range of the London Plan density ranges.

With this in mind, the Local Plan will need to carefully manage and promote densities in a proactive and positive manner to create sustainable communities which have regard to their surrounding context and character whilst optimising development potential in accordance with the requirements set at a national and regional level.

- Comprehensive and co-ordinated development

The borough's Opportunity Areas feature significant areas of brownfield land that can make an important contribution to the regeneration of Tower Hamlets and the delivery of much needed housing. However, these areas often have a fragmented and complex pattern of land ownership and there is a danger that the piecemeal development of individual sites can compromise the opportunity to achieve the best development and design outcomes.

Ensuring that development is brought forward in a comprehensive and co-ordinated way can help to ensure a higher standard of design is achieved. In particular, it can help to ensure the efficient use of land, promote a more coherent, legible and attractive townscape, create high quality living and working environments and help deliver appropriate public realm and infrastructure. It is therefore important that the Local Plan encourages a co-ordinated approach to regeneration, ensuring that development sites are consolidated or brought forward in a complementary way that achieves the optimum form of development.

- Liveable streets and public realm

Streets and public realm includes all the spaces between buildings that can be publically accessed, comprising roads, parks, squares, pedestrian routes and cycleways. The condition and quality of streets and public realm significantly impact on residents' quality of life and contributes towards successful placemaking and public health and well-being. Given the level of development and densities coming forward in the borough, there is a need to ensure that streets and public realm are attractive, functional and safe, and can accommodate the various needs of different

users. In doing so, new development will need to help create successful places by ensuring that urban spaces are appropriately defined by buildings, achieving a human scale of built form and a comfortable microclimate. Successful design should also help reduce crime and anti-social behaviour through the creation of defensible space and provision of lighting and CCTV. Streets and public realm will also need to be designed to cope with the increasing demands placed on them; allowing ease of movement, as well as creating places for entertainment and interaction.

- Housing quality

The borough is expected to deliver significant numbers of new homes, and it will be important to ensure that these are designed to the highest standards. This will include ensuring that new homes are of a sufficient size to accommodate the needs of a range of potential residents. The Government introduced national housing standards in March 2015, which set out requirements such as minimum internal floor areas and minimum floor-to-ceiling heights. Whilst some of these standards align with those in the current Local Plan, some are less onerous and will not create the same standard of amenity.

Housing quality is also about ensuring that new homes positively contribute to our health and wellbeing by ensuring adequate levels of daylight, sunlight, privacy and ventilation, as well as providing a good outlook and protection from unacceptable levels of noise. Design can influence these factors in a variety of ways, from the strategic layout of development of sites to detailed design elements. However, given the increasing pressure to increase housing densities there is a danger that some aspects of housing quality will be compromised. The new Local Plan must help to ensure that the appropriate standards are met, whilst delivering sufficient numbers of new homes.

Suggestions

1. Update to the local evidence base, which could include:
 - A Study on Sustainable Place Making for Tower Hamlets - to understand the impacts on sustainability of intensive levels of development and in particular of developments with densities above London Plan optimum ranges.
2. Review our existing policies in light of the above, supported by new evidence where necessary to:
 - Review and identify appropriate locations where concentrated clusters of more intensive levels of development are suitable and set out where they will be resisted.
 - Consider a policy which sets out the circumstances where levels in excess of the London Plan's upper density range will be acceptable on an exceptional basis.
 - Consider ways that new development can be brought forward in a comprehensive and co-ordinated way, avoiding piecemeal development and achieving the best development outcomes for the borough and its residents.
 - Review policies to reinforce that development should create and reinforce a liveable, safe, sociable and self-sustaining street and public realm network, particularly in light of increasingly intensive patterns of development.
 - Review policies to ensure that new housing is designed to the highest standards that meet the needs of a wide range of residents and reflects housing design requirements of different building densities.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

3.5.2 Historic Environment

What we know

- Protecting and enhancing the historic environment
Protecting and enhancing the historic environment is a key component of the NPPF and an important element of achieving sustainable development. Tower Hamlets' historic environment comprises heritage assets (buildings, features and spaces of local and national significance), which contribute to its unique and distinctive character. There is a need to ensure that new development preserves and enhances the identity of the heritage assets in the borough and where necessary bring them back into active use. As well as protecting and enhancing our heritage assets, it is

also important to consider how best we can protect their setting (the surroundings in which they are experienced). This is particularly important in light of the significant amount of change taking place in the borough and the anticipated levels of development coming forward. The Local Plan will therefore need to find ways to effectively balance these competing demands.

- Identifying non-designated heritage assets

Tower Hamlets has many heritage assets of local significance which contribute to the unique character of the borough. This includes public houses with heritage value that are highly valued by Tower Hamlets' communities and form part of local distinctiveness. However, these assets are not formally designated and are therefore at risk of being redeveloped without measures to preserve and enhance their heritage value. The Local Plan will therefore need to ensure that these important assets are sufficiently protected through Local List and Conservation Area Strategies.

- Strategic and local views

Tower Hamlets has a number of cross borough strategic views which require management in accordance with the London Plan. With the changing nature of the borough's skyline there will be a need to carefully manage development to ensure these views are not unacceptably harmed. There is also an opportunity, through the Local Plan, to identify and manage locally important views that contribute to the interest and character of the borough.

Suggestions

1. Review our existing policies in light of the above, supported by new evidence where necessary, to:
 - Ensure development has regard to the significance, character, scale and amenities of surrounding heritage assets and their settings.
 - Strengthen our existing approach which seeks to ensure development preserves and complement the boroughs heritage assets to also include non-designated heritage.
 - Identify some of the borough's non-designated heritage assets through the Tower Hamlets Local List. This could include protecting buildings of cultural interest such as public houses and preserving their community use.
2. Update the existing local evidence base, which could include:
 - Updating the borough's Conservation Strategy
 - Consider the best way to review our Local Views Assessment to ensure we continue to protect and enhance views for specific areas in the borough.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Transport and Connectivity



3.6 Transport and Connectivity

Story so far...

Tower Hamlets is a well-connected borough, supported by a comprehensive public transport network. This includes the Overground, Network Rail, four Underground lines and the DLR. Public transport accessibility will be further improved by the new Crossrail stations at Whitechapel and Canary Wharf. There are approximately 30 bus routes that pass through the borough. Riverboat services are also accessible at St. Katherine's Pier and Canary Wharf Pier.

Although the borough's population has increased, car ownership remains static and there are a growing number of residents walking and cycling to work.

Nevertheless, the borough has a number of challenges in relation to the capacity of the existing transport network. This includes traffic congestion during peak hours on the borough's major roads (A11, A12 and A13), public transport and on-street car parking.

Despite being relatively well served by public transport, parts of the borough are isolated and disconnected due to physical barriers created by roads, railways, rivers and canals. This creates poor connectivity within the borough, particularly movement north-south and to the east into neighbouring authorities.

Pollution from road traffic congestion is identified as the main source of emissions in the borough, which in turn has significant impacts on air quality, climate change and the health and well-being of our neighbourhoods.

Given the existing challenges the borough faces, the scale of growth projected cannot be accommodated by the boroughs existing transport infrastructure. Therefore, new development needs to demonstrate it can be sustainably accommodated with adequate transport and highway infrastructure and interventions to ensure the borough delivers sustainable communities.

What we know

- Congestion and Capacity

The borough's major transport routes suffer from congestion and over capacity, particularly during peak hours, on main roads and public transport. There is also more demand than capacity for on-street car parking. This is likely to remain a challenge for Tower Hamlets, given the projected growth which cannot be accommodated on the existing transport network.

There is an opportunity to better utilise and manage the borough's existing transport network to:

- Increase capacity on buses and trains by improving frequency and capacity.
- Reduce car trips and car ownership to alleviate on-street parking and road congestion by promoting sustainable transport, securing car-free development in appropriate locations, and managing of on-site and on-street parking.
- Encourage and promote cycling as a principal mode of transport for residents, by redesigning roads to accommodate appropriate and safe cycle lanes and cycle parking.
- Promote the use of river transport and taxis.

To further alleviate congestion and increase capacity, there are opportunities to reduce the need to travel via public transport and car by encouraging mixed used developments so people can access work and shops within walking distance. In turn, this will create more sustainable communities comprising homes, jobs, leisure and education facilities.

- Growth Areas

The borough's Opportunity Areas will deliver a significant number of new homes and jobs. However developments will increase demand on the existing congested and over capacity transport network. The delivery of these areas is dependent on the provision of adequate transport and highway infrastructure and interventions to ensure growth is matched with an improved and enhanced transport network will be necessary.

Working with the GLA, TFL and neighbouring authorities to ensure these areas are managed in a proactive and positive manner is crucial to the successful delivery of development in these areas.

- Connectivity and Accessibility

The borough's well connected road, railway, river and canal network also creates physical barriers and poor connectivity. This is a particular issue in the east of the borough where poor connectivity across the A12 and River Lea isolates and disconnects many communities. There is also poor connectivity between the Isle of Dogs and South Poplar because of Aspen Way.

Overcoming the physical barriers arising from the road, railway, river and canal network and enhancing connectivity within the borough and into neighbouring boroughs, will make joined up sustainable communities. In doing so, the new Local Plan provides an opportunity to coordinate development and focus investment to maximise opportunities to improve existing links and create new ones to improve connectivity, as well as ensuring sites increase movement through new developments.

- Strategic cross boundary connections

North of the River Thames, the borough shares its boundaries with the neighbouring authorities of Hackney, Newham and the City of London, and the LLDC planning authority. These areas include major, and growing, transport hubs, such as Stratford International and London City Airport, which offer benefits to Tower Hamlets businesses, through international links, and to residents, through employment opportunities. Many local residents travel out of the borough for work, which presents an opportunity to work with neighbouring boroughs and GLA to improve connectivity and accessibility to these areas.

Much of the traffic congestion on the borough's major roads (A11, A12 and A13) originates from trips which start outside the borough. A large proportion of users of these roads are travelling through the borough. Therefore any strategy to alleviate this congestion will need to be addressed strategically. This presents an opportunity to work with neighbouring boroughs, GLA and TfL to manage and mitigate the impacts of trips through the borough.

Strategic objectives have been identified by TfL for the east and south east sub-region to address overarching traffic congestion. A proposed East and South East London Transport Options Study is under way to look at further potential for improving connectivity and capacity to central London boroughs, particularly focused on the Isle of Dogs and South Poplar.

- Air quality

Road traffic congestion results in poor air quality and high levels of road noise, which impacts upon the health and well-being of residents' lives. The high levels of emissions and poor air quality has contributed to Tower Hamlets failing to meet the Government's air quality objectives. This is addressed in further detail in section 3.8.3.

- Public realm and street quality

In areas of the borough, streets and the public realm lack a coherent structure and are poorly laid out. The lack of consistency contributes to a poor visual appearance of the streetscape and public realm. To ensure the borough has liveable streets there is an opportunity to provide cohesive principles to ensure development improves and enhances public realm and streetscape. There is also an opportunity to reinforce the principle for the public realm to be 'green' as far as possible through the Green Grid, for improving general health and well-being, mitigating local flooding, and reducing the impacts of climate change.

- Safety and security

High levels of vehicle movements and congestion in the borough has a significant impact on collisions and conflicts between cyclists, pedestrians and vehicles. There is a need to ensure the growth of the transport network balances the needs and safety and security of all users.

Suggestions

1. Update the existing local evidence base for transport, which could include:
 - A Transport Impact Assessment for the borough to ascertain what levels of growth the borough can accommodate within the existing transport network and identify the required infrastructure and interventions to meet future growth.
2. Review our existing policies in light of the above, supported by new evidence, to:
 - Work with GLA, TfL and neighbouring boroughs to identify where additional transport infrastructure and interventions are required at a local and strategic level, to meet the demand generated by residential and employment growth.
 - Promote sustainable transport by prioritising walking, cycling and public transport to relieve congestion, improve air quality, and reduce noise pollution and carbon emissions.
 - Manage the growth in road traffic congestion by reducing car ownership/use and limit the level of car parking in new developments and on-street parking.
 - Reallocate and redesign road space to provide a safe environment that is accessible for walking and cycling, in accordance with the Road Safety Strategy and Cycling Strategy, and in line with the Roads Taskforce recommended strategies.
 - Promote active and healthy lifestyles by encouraging walking and cycling.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Open Space and Green Grid



3.7 Open Space and Green Grid

Story so far...

Tower Hamlets has a relatively wide range of open spaces that contribute to the wider landscape character and structure, including parks, city farms, natural greenspaces, historic burial grounds, playgrounds, housing amenity land and allotments. Victoria Park is considered one of the Country's best parks. Together with our waterways and recreational facilities of the Lee Valley Regional Park, they offer many benefits for people and communities, the environment, wildlife and the local economy. For instance, high quality parks, places for play, walking routes and canal paths will contribute towards improving health and well-being as well as providing environmental benefits such as reducing flood risk, supporting wildlife, creating areas of beauty and enhancing the character and identity of the borough.

The overall provision of publicly accessible open space in the borough is still low compared to some other London boroughs and national standards, and some parts of the borough are acutely deficient. The previous Local Plan has done a good job in developing a Green Grid Strategy which helped identify the important open space and waterways within the borough and make recommendations for potential investment in projects which helped to deliver a strategic network for our open space. With the expected population growth, the Local Plan needs to continue to ensure that adequate supply of high quality public and private open spaces, including gardens and balconies are provided for all to access and enjoy.

What we know

- Open space policies

The council's Local Plan has a clear position on protecting and safeguarding all existing open space, as well as maximising opportunities for new publicly accessible open space. It only allows development on open space in exceptional circumstances: where it provides facilities to ensure the function, use and enjoyment of the open space or where there will be an increase of open space and a better outcome is achieved.

New development has provided financial contributions to help improvements to the existing public open space including our parks with children's play areas, pocket parks, new event infrastructure at Victoria Park, resurfacing at Stepney Green and a landscaping improvement plan at Bartlett Park. This investment in public open space will continue and can be supported through the implementation of Community Infrastructure Levy (CIL), which came into force on 1st April 2015. In addition, it is expected that accessible on-site provision will still be sought through the planning process, where it is considered appropriate, due to the size or nature of the development.

- Multi-functional spaces

With open space in the borough at such a premium, it is important that existing and new open spaces fulfil as many roles as possible for the public. These include providing sport, play and active and passive recreation, enhancing health and wellbeing, supporting wildlife, and providing functional benefits such as reducing flood risk, reducing noise and air pollution, and ameliorating extremes of climate. These latter functions will become increasingly important with climate change and this is covered in more detail in section 3.8 below. The Green Grid Strategy considers all these benefits of open space, and will provide the mechanism for prioritising investment in open space projects.

- The accessibility of open spaces

The current Local Plan policies have been very successful in protecting our existing open space. However, since the last Local Plan and due to the borough's rapid population growth, there has been a decrease in the amount of public open space per 1,000 people. As a densely populated borough with large numbers of residents without access to a private garden and a rapidly increasing daytime workforce, existing publicly accessible open spaces need to be of the highest quality and should support an increasing range of demands from a diverse range of users. There is also a need to ensure that future publicly accessible open space needs are planned for in areas with the potential for substantial change such as Isle of Dogs and South Poplar Opportunity Area and Poplar Riverside Housing Zone.

A large proportion of the green space in the borough is housing amenity land. Much of this is currently not as well used nor as well valued as it could be. Often these spaces have little variety in the types of plants used, which limits the habitats they can provide to a range of wildlife. There are clear opportunities to realise the potential of this land to provide attractive and interesting open spaces, accessible to and used by residents and, where appropriate, the public. There are a number of good examples of recent schemes implemented by Tower Hamlets Homes, who have created 17 wildflower meadows across their estates, and housing associations, such as East End Homes who have made improvements to the Manchester Estate, where previously underused and spaces have been transformed to attractive, wildlife-rich places.

The need for open space has been and could continue to be met through a wide range of types of open space, including pocket parks, linear open spaces and growing spaces. These spaces have been delivered and enhanced through the green grid strategy, using section106 funding.

- Play Spaces

Tower Hamlets has a young population. The majority of the housing stock in the borough is flats, with very little private open space available for play. Creating safe, well designed play spaces for a range of ages, near to where young people live is crucial for improving health and wellbeing in the borough. The current Local Plan requires play space to be retained and provided in new residential development, in line with national

and regional standards and requirements. The new Local Plan will be expected to carry this policy forward.

- Waterways

The London Plan (2015) identifies waterways, such as those by rivers, canals, lakes and reservoirs, as Linear Open Spaces, and as such considers the opportunities provided by waterspaces as being important for sport, recreation and visual amenity, all of which contribute to health and wellbeing. Together these waterspaces constitute the Blue Ribbon Network - London's strategic network of waterspaces. In Tower Hamlets, the Blue Grid Strategy addresses the issues relating to the borough's waterspaces and flood risk. The waterways include the borough's historic docks, which form an important part of the distinct character, identity and heritage of the Tower Hamlets. In recent years, development has led to the loss of some open waterway at our historic docks in exceptional circumstances. Given the importance of waterways to the borough, it will be important to continue to protect and enhance these spaces through the policies in the new Local Plan.

- Green Grid

The delivery of the Green Grid responds to the borough's significant deficiency in open space. It aims to deliver 'green infrastructure' in the borough by enhancing the quality of existing open spaces and creating new public open space, as well as strengthening connections between them for the enjoyment of local communities.

It promotes a viable, convenient, safe and enjoyable alternative to private transport and promotes increased physical activity, and the corresponding health benefits. The Green Grid also promotes high quality, accessible green infrastructure that encourages ecological networks and links between habitats and responds to climate change, whilst improving access to habitats, greenspace and fostering community well-being.

The Green Grid, together with the Open Space Strategy provides an opportunity to ensure that green infrastructure is planned, delivered and managed in a co-ordinated and integrated manner.

Suggestions

1. Review the current Local Plan policies based on updated evidence. The new evidence could include:
 - An updated Open Space Strategy (including waterspaces) assessing the quantity and quality of all existing open space, children's playspace, sports and recreation facilities, and exploring opportunities for new provision based on needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities.
 - An updated Green Grid Strategy (considered in conjunction with transport networks such as cycling and walking; and with a health impact assessment).
 - Updated evidence from the Canal and River Trust to assess the quality of the borough's waterways and opportunities to enhance waterway use and access.

2. With land uses due to intensify and the associated residential and working populations set to increase, due consideration for planning for public open space needs must be considered as part of Site Allocations and all planning frameworks such as the Isle of Dogs Opportunity Area Planning Framework and Poplar Riverside Housing Zone.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

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Environmental Sustainability



3.8 Environmental Sustainability

This section covers:

- Waste Management and Contaminated Land
- Reducing Carbon Emissions
- Reducing Flood Risk
- Biodiversity

Story so far...

With significant growth projected for Tower Hamlets and London as a whole, the need to manage waste efficiently, safely and sustainably is a pressing issue. The Council has a responsibility to meet the London Plan waste apportionment targets and to fulfil this we have safeguarded waste sites for protection for this use. These sites have historically been used for operational waste management purposes. As the borough transitions away from its industrial heritage and with pressure for development and rising land values, safeguarded waste sites that were previously unviable for development are now being considered for redevelopment. The new Local Plan will need to review the Council's existing safeguarded sites and may need to safeguard other sites to continue to meet our responsibilities under the London Plan.

Tower Hamlets produces the third highest level of total carbon dioxide emissions of the 33 boroughs in London. Carbon dioxide is the key greenhouse gas causing climate change, and impacting on air quality. The borough has been suffering from poor air quality, mainly due to emissions from combusting engine vehicles and plant equipment. Given the significant levels of development and growth in the borough the council needs progressive CO₂ emission reduction policies to guide future development proposals. The borough also contains areas identified as at the greatest risk of flooding (near the River Thames and River Lea). The Local Plan plays a vital role in mitigating and adapting to the challenges of climate change through minimising carbon emissions, air pollution and flooding risks, which can have huge impacts on health and well-being and the local economy.

The borough has a diverse range of sites of biodiversity value, including areas of open space, waterways and formally designated Sites of Importance for Nature Conservation (SINCs). Developments that include 'living building' techniques (green roofs, walls, terraces) are increasing, but given the size and nature of development, biodiversity will need to be carefully managed to ensure new development protects and enhances these areas and also provide new opportunities for biodiversity.

3.8.1 Waste Management

What we know

- Waste apportionment
The London Plan (2015) apportions or allocates a target for each London Borough to manage a number of tonnes of waste (household and commercial and industrial). Each borough must then safeguard land to manage this waste. The London Plan (2015) downwardly revised the previous London Plan target for the number of tonnes of waste the council needs to manage. The Local Plan will therefore reflect these changes.
- Safeguarding sites
The borough has a number of safeguarded waste sites, which have been allocated to meet our waste apportionment target set out in the London Plan. These safeguarded sites are becoming more attractive for development as land values rise and the character of the borough transitions away from its industrial heritage. Development pressure is also being exerted on these sites by the regional and local need for housing and infrastructure. In addition, many of the borough's safeguarded waste sites are in designated areas for future housing growth in the London Plan, including the Fish Island area of the London Legacy Development Corporation (LLDC) and in the identified Poplar Riverside Housing Zone.

The new Local Plan will need to take account of these competing pressures and responsibilities. The Local Plan will consider the most sustainable and feasible options for meeting London Plan waste apportionment. Options include looking to secure alternative sites, areas or arrangements for meeting London targets and the continued safeguarding of existing sites safeguarded sites. In preparing the new Local Plan, the borough will consider the options available in partnership with other waste and planning authorities, the GLA and landowners to ensure that collectively we meet the ambitions of the London Plan in the most sustainable way.

- Waste facilities and reducing waste
The borough has a number of operational waste management facilities. However, these facilities do not manage all the waste created in Tower Hamlets. As such, part of the waste generated is managed outside of the borough. Waste management operations at a facility in the Poplar Housing Zone, have stopped operation and there are no new, or planned, waste management facilities in the borough.

The new Local Plan offers an opportunity to consider how the design of new developments can better encourage waste management, in line with the waste management hierarchy (prevention, preparing for re-use, recycling, other recovery, and disposal). Higher density developments and strategic site allocations provide an opportunity to consider whether innovative waste management solutions can be integrated into the design, construction and operational stages of development from the outset.

- Designing for waste storage, collection and movement

Poor design can result in an untidy, unhealthy, unsafe and unsightly public realm, for example, where insufficient storage space for waste leads to the disposal of waste on the street. Design of new developments needs to consider adequate internal and external storage, separation of waste types such as recyclable waste or organic waste and the location of and accessibility to storage containers for people and waste disposal vehicles. There is an opportunity for the new Local Plan to review how well our design policies have been working and introduce improvements to address this where possible.

The borough's new developments will generate increased movements by the authority's waste disposal vehicles. The new Local Plan also provides an opportunity to encourage new development to minimise the resulting trips generated.

Suggestions

1. Develop an evidence base that seeks to identify strategic and innovative options to minimise highways based implications of an increased volume of waste being created in the borough. This piece of work could consider the feasibility of:
 - Managing waste onsite
 - Installing new suction based technologies in new and existing developments
2. Update the existing waste evidence base in light of new national and regional policy to consider the best methods for the borough to meet London Plan targets for waste apportionment and safeguarding of land, as well as the ability of the borough to practically manage waste generated in the borough. This piece of work could consider the feasibility of:
 - Continuing to safeguard existing waste sites
 - Safeguarding new sites or areas (including in the London Legacy Development Corporation area) that could meet waste apportionment targets, as well as the practical need to manage the borough's waste as close to source as possible.
 - Pooling waste apportionment targets to the satisfaction of the GLA and the relevant boroughs.
3. Revise our existing policies in light of the new evidence base, policy and good practice standards.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Are there matters not discussed that we should be considering?**

3.8.2 Reducing Carbon Emissions

What we know

- Policy drivers

Carbon dioxide is the key greenhouse gas causing climate change. Whilst the Government has delayed the delivery of zero carbon homes, there remain significant drivers to reduce carbon emissions including the Mayor of London's objective of delivering a 60 per cent reduction in CO₂ by 2025; and the 80 per cent cut required under the 2008 Climate Change Act.

Growth in population and employment is likely to make it more challenging to reduce emissions, as will the increasing number of smaller households which tend to have higher per capita emissions. However, growth also provides a number of opportunities for securing reduced CO₂ emissions. These include, through the construction of highly energy efficient homes and offices, the development of decentralised energy networks, securing of finances for carbon offsetting and retrofitting of existing buildings and homes to reduce their energy use and fuel bills.

All development must be considered in respect of the EU directive on energy performance of buildings, which requires member states to ensure that all new buildings are nearly zero energy buildings by 2020, and that public authority new buildings are nearly zero energy after 31st December 2018.

Suggestions

1. Review our current policies to continue to reduce carbon emissions through:
 - the delivery of energy efficient buildings;
 - the requirement for developments to be designed to connect to existing or proposed decentralised heat and energy networks;
 - the requirement for the integration of renewable energy technologies into developments to meet the UK and EU targets for electricity from renewable sources by 2020
2. Continue to request the highest standards of sustainable design and construction in new developments and ensure they are designed for future climate scenarios.
3. Consider a move towards a zero-carbon borough in line with European carbon emission targets.

Let us know what you think



Do you agree with our proposed approaches?



Is there anything not discussed that we should be considering?

3.8.3 Reducing Air Pollution

What we know

- Air Quality

Parts of Tower Hamlets, particularly around major roads, have some of the poorest air quality levels in London. Since 2000 the borough has been declared an Air Quality Management Area (AQMA) for both NO₂ (Nitrogen Dioxide) and PM10 (particulate matter). This means that the air quality in Tower Hamlets is constantly monitored to identify the levels of harmful pollutants, which have adverse effects on residents' health and well-being. Since monitoring began, Tower Hamlets continues to exceed Air Quality Objectives.

As development pressures increase and more constrained sites are brought forward, either for new development or change of use, it is likely that residential development will increase near major roads. A key challenge for the new Local Plan therefore is to actively support the reduction of poor air quality in the borough by identifying actions to reduce air pollution and where this is not possible, mitigating measures, including design and off-setting actions should be encouraged.

Suggestions

1. Review the current policy position and consider focusing on enhancing our monitoring network framework to improve understanding of air quality in development areas to minimise exposure and health risks of residents.
2. Review our current policy position to consider how plant, vehicle, construction and operational emissions from new developments can be appropriately assessed, and reduced where possible, and all remaining significant impacts are adequately mitigated.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

3.8.4 Reducing Flood Risk

What we know

- Flood Zones

The National Planning Policy Framework (NPPF) states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk”. It is also well recognised that climate change is a major contributor to flood risk.

The Isle of Dogs and eastern areas of the borough are located in Flood Zone 2 and 3 (Medium and High Probability), whereas the western and northern areas away from the River Thames and River Lea are in Flood Zone 1 (Low Probability). The borough’s flood risk zones also fall within the opportunity areas which will experience high growth in the next 10-15 years. Therefore it’s important to ensure that developments do not increase flood risk and reduce flood risk where possible through design.

- Surface Water Flooding

In addition to risk from flooding from the borough’s rivers, surface water flooding is thought to pose the greatest risk of flooding within the borough. Through urbanisation, most of the borough is paved and surface water rainfall is drained away via piped systems and into the combined sewer system. The sewer system was built in the Victorian period and its capacity for rainwater is limited. The Isle of Dogs is most vulnerable as a low lying area and the lowest part of the catchment.

The new Local Plan provides an opportunity to work with stakeholders to consider how new development can further reduce the risk of surface water flooding through incorporating design features including rain water harvesting and installing Sustainable Drainage Systems (SuDS).

Suggestions

1. Update our Strategic Flood Risk Assessment (SFRA) to take account of new modelling and mapping requirements as well as national policy.
2. Update our policies in light of updated flood risk assessments, the Council’s new (SuDS) guidance document and to consider further design options to reduce local flood risk.
3. Continue to engage with Thames Water to ensure that sewer capacity able to support future development.

Let us know what you think

 Do you agree with our proposed approaches?

 Is there anything not discussed that we should be considering?

3.8.5 Biodiversity

What we know

- Protecting important habitats and species:

Tower Hamlets supports a variety of wildlife. This includes rare and protected species such as bats, peregrine falcons, great crested newts and black redstarts. Our Local Biodiversity Action Plan, published in 2014, sets objectives and targets for conservation of our priority species and habitats, and suggests what the council and other stakeholders can do to achieve these objectives.

In recent years a variety of excellent projects to enhance local biodiversity have been delivered, both in council managed open spaces and in schools and housing estates. Mile End Park is widely acknowledged as an exemplar of how to integrate wildlife habitat within a heavily-used urban park. Through the planning system, and existing Local Plan policies, the council has secured biodiversity improvements, such as the provision of green roofs and living walls, bat boxes, bumblebee boxes and nest boxes for important bird species.

- Sites most important for wildlife:

The borough currently has 35 Sites of Importance for Nature Conservation (SINCs) which have been identified using criteria adopted by the Mayor of London, and they were most recently reviewed in 2009. Guidance published by the Department for Environment, Food and Rural Affairs (DEFRA) recommends review of SINCs every 5-10 years.

Suggestions

1. Undertake a Habitat Regulation Assessment Screening to inform the draft of Local Plan policies in the next stage, including a review of Sites of Importance for Nature Conservation to ensure all important sites are protected.
2. Retain our current planning policies which seek to protect important wildlife sites and ensure that new development provides enhancements for biodiversity, including green roofs.
3. Review Sites of Importance for Nature Conservation in 2016 to ensure all important sites are protected.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

Section Four: Infrastructure, Delivery and Monitoring

4.1 Introduction

This section will discuss the general principles underpinning delivery and monitoring of a Local Plan in line with current Government guidance. The main focuses are set out as follows:

1. Development opportunities in Tower Hamlets
 - Opportunity Areas
 - Site Allocations
2. Supporting development with adequate infrastructure
3. Viability
4. Monitoring the Plan

Story so far...

The Mayor of London has identified the Isle of Dogs and South Poplar, Lower Lea Valley and City Fringe/Tech City as Opportunity Areas where significant additional homes and jobs are expected to be accommodated. The Poplar Riverside Housing Zone is also regarded as a great opportunity to drive forward housing growth. At a local level the council has allocated sites to support the borough's population growth with new homes and key infrastructure, such as schools and open space.

The new Local Plan provides an opportunity to ensure that growth in these areas comes forward in the most sustainable way. It will be important to prepare new Local Plan policies that manage and coordinate growth in different development sites and allocations, to ensure they support the delivery of necessary infrastructure, which meets the needs of the borough's growing population. Therefore, to facilitate the delivery of infrastructure for the borough both now and in the future, the development of the new Local Plan will require a proactive and positive joint working with infrastructure providers, the development industry and the public to identify, prioritise, fund and deliver infrastructure in a timely manner, alongside viability considerations.

The consideration of viability is a key factor in preparing a Local Plan. The NPPF states that plans should be deliverable, and understanding Local Plan viability is critical to the overall assessment of deliverability. Therefore, the Local Plans will be aspirational but realistic, and will ensure that the impact of the policies when read as a whole should be such that the plan is deliverable.

The Annual Monitoring report (AMR) provides an assessment of policy performance and plays a crucial role in understanding policy implications and formulating robust policies. The Council has published an Annual Monitoring report since 2005, and will continue to monitor the effectiveness of the Local Plan through the AMR.

4.2 Opportunity Areas

The London Plan (2015) identifies a number of Opportunity Areas within Tower Hamlets - namely City Fringe/Tech City, Isle of Dogs and South Poplar, and the Lower Lea Valley (including part of the Olympic Legacy area and the Poplar Riverside Housing Zone). These areas have emerging planning frameworks and/or development strategies, which will inform the development of the Local Plan, and provide further guidance to manage and coordinate development.

Delivering the full development potential in these areas is critical to helping manage the borough's continued growth, through the provision of homes, jobs and infrastructure. These areas will also contribute to delivering the vision for Tower Hamlets. These areas are further detailed in section 2. 'New Plan, New Vision'. Therefore, it is important that the council responds proactively by working collaboratively with the GLA, TfL, landowners, developers and other key stakeholders to make sure sustainability is built into the strategic planning framework for these areas, as well as locally specific policies which are supported by Tower Hamlets communities.

The council has been working in partnership with the key stakeholders (e.g. developers, Government agencies, local communities, neighbourhood forums) in these identified Opportunity Areas to make sure that their plans and strategies contribute positively to the vision and strategic objectives of the emerging Local Plan.

The London Plan requires Local Plans to integrate policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing. The council considers that these requirements align with the principle of sustainable development set out in the National Planning Policy Framework (NPPF). The principle of sustainable development underpins all aspects of plan making, including the preparation of our new Local Plan and its policies.

The regeneration of areas in the borough including the identified Opportunity Areas, Housing Zone and site allocations provides an excellent opportunity to deliver models of exceptional place making, which embody the true principles of sustainable development. In order to support this, the new Local Plan can define those elements we consider most important to the delivery of these places. The delivery is also dependant on a commitment from landowners and developers to meaningfully engage and collaborate with the community and stakeholders. We can encourage applicants to go the extra mile and exceed the requirements for community involvement set out in national regulations and in the Statement of Community Involvement (SCI).

4.3 Site Allocations

One of the key parts of deliverability is identifying potential development sites within the borough. In doing so, the council can influence the type of development built in the certain locations and ensure that the community will benefit from large scale development through securing infrastructure and affordable housing. There are currently twenty Site Allocations in the Managing Development Document (2013). These sites have been allocated to plan for strategic housing developments (i.e. sites that can provide over 500 new net-additional homes).

Given the anticipated population growth, there is also a need to review existing site allocations and identify additional sites to support the delivery of new homes and key infrastructure, such as schools and publically accessible open space. If sites are not identified and safeguarded for specific uses, the borough would be at risk of not being able to meet its identified housing target, and the provision of infrastructure for its communities.

The new Local Plan will consider whether it is necessary to allocate sites to include the following uses:

- Large scale housing development
- Health facilities
- Leisure facilities
- Open space
- Idea Stores
- Primary school
- Secondary school
- District heating facility
- Waste management facility
- Gypsies and Travellers accommodation
- Multi-faith burial ground
- Employment uses

The new Local Plan will not identify all sites that will be developed in the borough over the plan period, but only sites with strategic and regeneration importance. Other sites, including smaller infill sites, can be appropriately managed using the emerging policies in the Local Plan.

Suggestions

1. Continue to gather information on potential sites within the borough for allocation of strategic uses through the 'Call for Sites' exercise.
2. Review the existing site selection method as suggested below:

Stage 1	Development of a sites database using sites from the SHLAA (Strategic Housing and Land Availability Assessment), and sites submitted as part of the 'Call for Sites' information gathering and Site Allocations in the existing Local Plan (Managing Development Document).
Stage 2	Development of selection site criteria selection
Stage 3	Undertake site assessment to identify sites of strategic and regeneration importance
Stage 4	Final list of suggested site and allocated uses

Table 3 Proposed process for site selection

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

4.4 Infrastructure provision

Planning for infrastructure is at the heart of this Local Plan. The facilities and services needed to support our communities and to enable the local economy to thrive, includes but is not limited to, the following:

- **transportation:** roads, bus routes, train network;
- **education facilities:** schools, colleges, universities, adult learning centres;
- **community facilities:** Idea Stores, libraries, sports and leisure facilities, community centres;
- **health care:** hospitals, local GP surgeries and other facilities;
- **open spaces:** parks, playing fields and sports pitches
- **telecommunication:** Super-fast broadband connection, wireless hotspot

How is infrastructure funded?

The infrastructure required for Tower Hamlets will be funded from a range of sources, including the following:

- **Section 106 Planning Obligations (s106):** are obligations on the developer which are: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- **Community Infrastructure Levy (CIL):** is a standard levy on new development. The funding is collected by the council and is then reinvested in infrastructure necessary to support growth in the borough.
- **Others:** contributions from developments will not be able to fund all of the costs of new infrastructure, particularly where there are existing deficits. We will need to identify other sources of funding for projects where necessary.

Evidence to support the council's Community Infrastructure Levy (CIL) shows that the cost of meeting our infrastructure need is far greater than the available funding. In 2013/14, the council estimated that the aggregate infrastructure cost to be over approximately £530 million. It is likely the Community Infrastructure Levy will make a modest contribution (approximately 40 per cent) towards filling the likely gap to fund local infrastructure. Therefore it will be important that we work with government, GLA, key infrastructure partners including TFL and the development industry to bridge the gap in funding.

The 2013 Infrastructure Delivery Schedule has indicated that transport and connectivity, education, training facilities and area based enhancement projects are amongst the highest costing infrastructure categories. This schedule will be updated to reflect current infrastructure priorities, based on the anticipated level of growth and the most relevant information from different service areas across the Council.

Tower Hamlets will experience considerable residential and commercial growth in years to come and this will bring with it a greater demand for infrastructure to support more residents, workers and visitors. The council has implemented a local Community Infrastructure Levy (CIL) which will secure a considerable amount of funding from residential and commercial developments towards delivering infrastructure. The CIL will also be reviewed alongside the production of the new Local Plan to ensure it is set at the most appropriate level when the plan is adopted. However, funding from CIL is not designed to pay for the full cost of providing infrastructure. The council will secure funding from other sources, such as Government grants and match funding in order to ensure the delivery of the necessary infrastructure to support the development of the borough.

In order to understand what additional infrastructure will be necessary over the life of the plan, an evidence base will be produced to assess infrastructure needs and provide a delivery plan that will detail what infrastructure is required and when and how it will be delivered. This plan will be regularly monitored and updated to reflect



current infrastructure priorities, based on anticipated levels of growth and the most relevant information from all service areas across the council.

Projections of growth on which infrastructure needs and priorities will be based comes from the council's Growth Model which provides an up to date and realistic assessment of growth expected through development in the borough. This model will be updated at least annually to ensure that the council constantly monitors the pattern of growth and can adapt its infrastructure needs analysis and delivery plan as necessary. This will help the council better plan for infrastructure.

Suggestions

1. Undertake the scoping of a new Tower Hamlets Infrastructure Study to identify specific infrastructure requirements necessary to enable growth over the new Local Plan period. This could include a live infrastructure schedule where the information is reviewed and updated regularly. This schedule could cover for at least the first five years of the plan period and include:
 - Needs and costs
 - Funding sources
 - How it relates to the developer/rate of development; and
 - Responsibilities for delivery

Let us know what you think

-  **Do you agree with our proposed approaches?**
-  **Is there anything not discussed that we should be considering?**

4.5 Viability

Since the council's last Local Plan, the national planning policy focus on facilitating the delivery of the Local Plan policies and its development targets has placed even more emphasis on the importance of viability.

The National Planning Policy Framework (NPPF) states that *"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"*. It calls for all policy requirements being considered together in assessing viability. This means a Local Planning authority will need to:

- test the whole plan and all its policies together to assess whether the plan can be delivered in relation to viability, show its impact on viability in terms of the local economic conditions and market realities; and

- carry out separate viability assessment on strategic sites if they are the most important supply to meet growth targets.

The current Tower Hamlets Local Plan is supported by a number of separate viability assessment, including:

- Tower Hamlets Viability Appraisal of Proposed Development Site Allocation (Central Area) (April 2008)
- Tower Hamlets Affordable Housing Viability Study: 2011 Update(December 2011)
- Tower Hamlets Sites Viability Testing (February 2012) & Neptune Wharf scenario viability test (Revised July 2012)
- Community Infrastructure Levy viability Assessment (2014)

The above viability evidence will need to be updated to support a new Local Plan.

Suggestions

1. Undertake an integrated Viability Assessment across the whole Local Plan (including policies and sites), alongside the review of CIL Charging rates.

Let us know what you think

 **Do you agree with our proposed approaches?**

 **Is there anything not discussed that we should be considering?**

4.6 Monitoring the plan

Monitoring is a key component of an effective planning system. Under the plan-monitor-manage approach, monitoring plays a crucial role in evaluating policy performance, understanding policy implications and formulating robust policies. Prepared by the council, an annual Monitoring Report provides a means of assessing the performance and effectiveness of key policies in the Local Plan.

Importantly, an annual Monitoring Report is the primary tool for identifying policies which are performing effectively, as well as those that are not, and therefore need to be reviewed. Policies are assessed using a series of indicators covering a wide range of spatial planning matters.



The monitoring indicators can be amended in order to reflect changes at national, regional and local levels. The Sustainability Appraisal Scoping Report (2015) can help shape the monitoring indicators for the Local Plan in terms of monitoring environmental and sustainability effects. Some good practice has suggested that

provision should also be made to monitor the impacts of the plan and its sustainability effect.

Suggestions

1. Review all monitoring indicators to make sure they reflect both the Council's and local communities' priorities, alongside the indicators set out in the Sustainability Appraisal Framework

Let us know what you think

-  **Do you agree with our proposed approaches?**
-  **Is there anything not discussed that we should be considering?**

APPENDICES

Appendix 1 – Evidence Pipeline

The list of evidence base documents below is not exhaustive at this stage and is likely to be updated during the drafting of the Local Plan. They have been identified based on the national planning policy requirements in accordance with the National Planning Policy Framework (2012).

Project	Status
Sustainability Appraisal	Scoping commenced summer 2015
Tower Hamlets Growth Model	To be finalised autumn 2015
Employment Land Review	To be commenced autumn 2015
Town Centre Study	To be commenced autumn 2015
Waste Management Evidence	To be commenced autumn 2015
Open Space Strategy	To be commenced autumn 2015
Strategic Housing Market Assessment	Finalised autumn 2015. Further needs may be identified to meet Local Plan evidence requirements.
Habitat Regulation Assessment	To be commenced spring 2016
Strategic Flood Risk Assessment	To be commenced spring 2016
Viability Assessment	To be commenced spring 2016
Infrastructure Delivery Plan	To be commenced spring 2016
Transport Impact Assessment	To be commenced spring 2016
Gypsy and Traveller Accommodation Needs Assessment	To be commenced spring 2016

Appendix 2 – Acronyms & Glossary

Glossary	Definition
Affordable Housing	Social rented, affordable rented and intermediate housing (definitions below) provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and the council's housing allocation policy.
Community Infrastructure Levy (CIL)	A charge on larger planning applications to help fund new infrastructure required to support the development.
Development Plan	The borough's Development Plan is comprised of the London Plan (produced by the Mayor of London), the Local Plan and any Neighbourhood Plans that may come forward. This set of documents is used to manage development by helping to assess planning applications. It is guided by national guidance and supported by other supplementary guidance.
Defensible Space	An environment whose building layout, design features and site plan discourages crime and anti-social behavior through increasing visibility and positive activity in the space.
Duty to cooperate	The duties on the council and other public bodies to proactively engage with each other on an on-going basis to ensure any strategic cross boundary issues are addressed through the plan making process.
Early years settings (EYS)	Facilities and services for children of pre-school age (0-4), which include childcare providers, Children's Centres and nurseries.
Evidence base	Policies contained in the Local Plan must be supported and justified by appropriate, up-to-date and relevant evidence in terms of the economic, social and environmental characteristics and prospects of the area and must meet

Glossary	Definition
	identified needs. This makes up the evidence base for the Local Plan. A wide range of evidence base studies is listed in Appendix 1 of the document.
Housing Zone	An initiative of the Mayor of London to accelerate new housing development in specific areas of London, including Poplar Riverside in Tower Hamlets.
Infill development	Development that takes place on vacant or undeveloped site between other developments and/or built form.
Intermediate Housing	Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent
London Legacy Development Corporation (LLDC)	The LLDC became the planning authority for the Olympic Legacy area following the Olympic Games in 2012. The north-east area of Tower Hamlets (Hackney Wick/Fish Island and Bromley-by-Bow) was transferred to LLDC in terms of planning responsibilities. Nevertheless, Tower Hamlets continues to provide other services and responsibilities such as the allocation of affordable housing and provision of school places.
London Plan	The London Plan is the spatial development strategy for all of London. It is written by the Mayor of London and the Greater London Authority. London boroughs' Local Plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the London Mayor.
Low threshold enterprise space	Lower value non-residential space often found at the edge of town centres or in areas of lower footfall. It may also consist of lower-quality premises than other properties in the area.
National Planning Policy Framework	The National Planning Policy Framework

Glossary	Definition
(NPPF)	sets out the national Government's economic, environmental and social planning policies for England.
National Planning Practice Guidance (NPPG)	Online resource giving up-to-date Government planning guidance and requirements.
Neighbourhood Planning	<p>Neighbourhood Planning gives communities the ability to create planning documents and development orders: Neighbourhood Development Plans and Neighbourhood Development Orders. A Plan must be in 'general conformity' with the strategic policies of the council's Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic policies. An adopted plan will form a part of the statutory development plan and will be used to inform planning application decision making for the relevant area.</p> <p>Neighbourhood Planning is undertaken by Neighbourhood Forums within designated Neighbourhood Areas. Since the introduction of the regulations, Tower Hamlets has two designated neighbourhood areas and one designated neighbourhood forum – the East Shoreditch Neighbourhood Planning Forum and Area; and Wapping Neighbourhood Planning Area.</p>
Opportunity Area	The London Plan identifies Opportunity Areas in the City Fringe/Tech City, Isle of Dogs and South Poplar and Lower Lea Valley as having the ability to accommodate high levels of growth, focusing on housing.
Planning obligation (Section 106 agreement)	A legal agreement between the developer, local authority and other interested parties primarily intended to make acceptable those developments that would otherwise be unacceptable in planning terms.
Private Rented Sector (PRS)	All non-owner occupied self-contained

Glossary	Definition
	dwellings that are being rented out as housing (not including forms of affordable housing).
Strategic Housing Land Availability Assessment (SHLAA)	An assessment which identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period.
Strategic Housing Market Assessment (SHMA)	An assessment of objectively assessed needs for market and affordable housing.
Site allocation	Site allocations have been identified to plan for strategic housing developments (i.e. sites that can provide over 500 new net-additional homes in the current Local Plan) and key infrastructure which will help the borough meet its housing targets and for key regeneration sites.
Sites of Interest for Nation Conservation (SINC)	Local landscape features, both in built up areas and on open land that are affected by development and will promote conservation and enhancement.
Small and medium-sized enterprise (SME)	A category of businesses that employs overall a total of no more than 250 people.
Starter Homes	Included in the draft Housing and Planning Bill, this is a new dwelling which is only available for purchase by qualifying first time buyers and which is made available at a price which is at least 20 per cent less than the market value. The maximum price a starter home may be sold to a first time buyer in London is £450,000.
Sustainability Appraisal (SA)	The SA appraises the policies in the Local Plan, to identify the potential social, economic and environmental policy impacts and identify alternatives. This is used alongside the Strategic Environmental Assessment, Health Impact Assessment, Habitats Regulations Assessment and Equalities Impact Assessment, which also appraise impacts on specific groups or characteristics. The SA Scoping Report and the other impact

Glossary	Definition
	assessments Screening Reports which required at this stage are published alongside this document for consultation.
Tower Hamlets Community Plan (2015)	The Community Plan provides the Tower Hamlets Partnership's long-term vision for the borough, articulating local aspirations, needs and priorities. It informs all other strategies and delivery plans of the partnership, including the council's Strategic Plan.
Tower Hamlets Growth Model	A dynamic model used to project development in the borough over the next 20 years.
Town centre	An area of commercial uses within a boundary defined by an adopted Local Plan, often serving as a focal point for a community/communities. Not all areas of predominantly retail/commercial activity will therefore be officially defined as town centres.
Town centre hierarchy	Sets out what role and function different town centres in the borough perform in relation to each other and across London. It includes the borough's Central Activities Zone (CAZ), activity areas, major centre, district centres and neighbourhood centres.
Waste apportionment	The amount of London's waste that each borough is required to manage to ensure London is self-sufficient in managing its municipal, commercial and industrial waste that it produces. This requires an amount of land to be safeguarded within the borough.

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