

Sadiq Khan, Mayor of London
Greater London Authority
City Hall
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By email: londonplan@london.gov.uk

2 March 2018

Dear Mayor Khan,

Re: Draft London Plan

Thank you for giving the Council the opportunity to respond to the Greater London Authority's Draft London Plan Consultation that closes on 2nd March 2018.

A more detailed response, provided by my planning department in conjunction with all relevant Council departments, to each of the proposed policies is attached. However I wanted to take the opportunity to highlight our key concerns and areas of agreement.

Strategic Planning

The draft Plan represents a significant move away from strategic planning and towards establishing a Development Management Plan for London. While we support policies like S6 (Public Toilets), E9 (Retail, markets and hot food takeaways) and D9 (Basement Development) and have similar policies in our current and draft Local Plans, their inclusion in a strategic planning document for London gives rise to a number of concerns.

First, we consider the London Plan, as currently envisaged, plays an important role in the strategic planning of our city. It provides a broad spatial vision for the future of the city not just in terms of growth but the form of that growth, providing direction in relation to place shaping and design. The absence of a spatial, design-based, strategic vision for the city increases the risk of relying purely on components of growth and missing how the growth is accommodated and shaped. This could compromise London's place as a unique global city with distinct character.

Secondly, London is a diverse city, comprised of a range of different communities. Reducing local discretion over detailed planning policies risks reducing the ability for these distinct areas and communities to consider and resolve these concerns in a locally appropriate manner. While we may support the policy approaches you have taken in this plan, this will set a precedent for future London Plans which may seek to include directive policies which we think would be locally unsustainable and unsuitable.

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Finally, extrapolating locally established policies to solve locally evidenced concerns, to a London-wide scale, risks undermining these policies if it cannot be evidenced that these really are London-wide concerns. We hope that the London Plan team are confident and have sufficient evidence to defend the inclusion of these policies, many of which have been challenged at a Local Plan level due to insufficient local evidence.

Spatial Strategy

We are supportive of the approach in this plan to rebalance London's growth away from sole reliance on increasingly dense inner London, to delivering further development in outer London. However, as we raised in our response to the 'A City for All Londoners' document, we consider this London Plan is a missed opportunity to reconsider London's spatial strategy. This document is clear that the primary objective is to deliver London's growth within its boundaries, and the opportunity to undertake an up to date assessment of the role and function of the Green Belt in the 21st Century, has been squandered.

As a result of the strengthened protection for the Green Belt, the draft Plan is forced to rely on enabling higher densities and the high risk approach to small sites, which could have extremely detrimental impacts on local character and heritage, as well as on amenity and liveability and faces a number of significant obstacles to delivery.

While I agree there are selective opportunities for densification and the development of smaller sites across London, a more imaginative approach to Green Belt would, in my view, help all of us. This could, for example, be based on a principle of 'no net loss', with additions to replace deletions, intensification near transport hubs, and with an over-riding obligation to conserve quality areas of green belt but recognising that the broader designation includes many areas of undistinguished or indeed poor environmental quality. A result, such an approach would better manage growth and demand across London, while conserving areas of genuine environmental quality, and maintaining a cordon as originally intended.

Opportunity Areas

A significant proportion of Tower Hamlets is already designated as an Opportunity Area and we are deliver a significant proportion of London's housing and employment growth, with 4,260 new homes delivered in 2016/17 alone.

In relation to the designation of a new Opportunity Area at Poplar Riverside, I would like to take this opportunity to stress our expectation of such a designation. As with the Council's proposed approach for the Isle of Dogs OAPF area, any Poplar Riverside OAPF would need to be focused on facilitating the delivery of new communities in the area by unlocking the significant need for local infrastructure (e.g. bridges over the River Lea) to enable and accelerate housing delivery. This will require a positive approach to funding from any OAPF for the area, identifying options for funding, phasing and delivery solutions. Such solutions are likely to need to involve direct action and support from local, regional and national government, as well as other stakeholders. The absence of this contiguous support would be a real missed opportunity to deliver a significant quantity of homes in a high quality, sustainable new community. The London Plan should reflect these matters clearly in relation to the Poplar Riverside Opportunity Area.

Affordable Housing

I would like to re-iterate my support for the approach you have taken to affordable housing. We are extremely supportive of the 50% affordable housing target and the range of genuinely affordable

products. Over the last few years, Tower Hamlets has delivered the highest levels of affordable housing in London – over 3,500 affordable homes between 2012 and 2017. We are confident that with the GLA's support we can continue and improve on this delivery.

Economy

I also welcome the commitment to ensuring that, despite the need for housing, London's economy still receives the priority and space it needs to grow – both employment space and industrial space. In light of Tower Hamlets' role as home to two of the main employment locations in London – Canary Wharf and the City Fringe as well as a range of important industrial land – we support the emphasis on the importance of London's economy. Just as important is the focus on ensuring a wide range of employment space is available, so as to support a broad number of businesses. This supports our objective of prioritising local job creation and training opportunities for residents.

We hope these comments can inform the examination of the London Plan and we anticipate that the Council will want to participate at the examination.

Yours sincerely,



John Biggs
Mayor of Tower Hamlets

London Borough of Tower Hamlets response to the draft London Plan 2017

Policy Section	Consultation response
Chapter 1 Planning London's Future (Good Growth Policies) 9	
Policy GG1 Building strong and inclusive communities 13	We are supportive of this policy approach and we consider that it aligns with our draft Local Plan's strategic objectives to manage growth and share the benefits. We are particularly supportive of the focus on the holistic role design of buildings and spaces play in fostering sustainable communities, the emphasis on social infrastructure and emphasis on integration and inclusivity.
Policy GG2 Making the best use of land 15	<p>We are supportive of these policies, as principles for ensuring the best use of land, but do question the assumption that there is no alternative to London accommodating all of London's growth. It is not clear that this assumption has been adequately tested.</p> <p>We would have expected the GLA to have considered the future role of London in the context of its wider hinterland, in the context of Brexit and the emergence of development corridors emanating into the wider South East, with a view to developing an overarching spatial framework as part of a new national infrastructure and delivery plan.</p> <p>GLA should also lobby the government to undertake a structured review of the green belt and countryside within the commuter belt beyond London, in terms of identifying the broad locations where new settlements and urban extensions would be best located to deliver the principles of good growth and relieve the pressure on London's already stretched boroughs.</p>
Policy GG3 Creating a healthy city 17	<p>We strongly support the prioritisation of health as an objective for the London Plan.</p> <p>We are supportive of the suggested use of HIAs but would suggest this could be strengthened – perhaps including a policy requiring HIAs for all developments of a scale referable to the GLA?</p>
Policy GG4 Delivering the homes Londoners need 19	Support this policy, in particular the 50% affordable housing target and focus on delivery, with some concerns regarding specific elements of the detailed housing policies (see specific policy responses).
Policy GG5 Growing a	We support this policy, in particular we support strengthening London's economy and sharing the benefits of

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good economy 21	growth.
Policy GG6 Increasing efficiency and resilience 23	We support these policy objectives; however we consider it would be useful for part D to emphasise the value of local plans and infrastructure delivery plans to lead this co-ordination.
Chapter 2 Spatial Development Patterns 25	
Policy SD1 Opportunity Areas 28	<p>We welcome the continuation of the approach to Opportunity Areas. However, further clarification is required in terms of the future role and purpose of Opportunity Area Planning Frameworks, as well as the timing and delivery of key infrastructure, and the extent to which it will need to be in place in advance of development. Further thought is also required regarding and the potential cumulative impacts arising from further intensification of development within existing well-built up areas on the well-being and health of communities, and how these impacts can be assessed in a clear and consistent manner across London.</p> <p>Isle of Dogs and South Poplar – we have worked closely with the GLA on developing this opportunity framework, however in developing it a number of questions arose regarding the role of the framework. We consider that the greatest value such a framework can provide is in identifying specific design guidance and in identifying opportunities to overcome delivery constraints, in particular infrastructure limitations. Following our experience – we would suggest these are embedded in the policy. Otherwise there is a risk that such frameworks are viewed as mechanisms to inject greater housing delivery in areas which are already be subject to development pressure, with resulting significant impacts on local communities.</p> <p>Poplar Riverside – As with the Council's proposed approach for the Isle of Dogs OAPF area, any Poplar Riverside OAPF would need to be focused on facilitating the delivery of new communities in the area by unlocking the significant need for local infrastructure (e.g. bridges over the River Lea) to enable and accelerate housing delivery. This will require a positive approach to funding from any OAPF for the area, identifying options for funding, phasing and delivery solutions. Such solutions are likely to need to involve direct action and support from local, regional and national government, as well as other stakeholders. The absence of this contiguous support would be a real missed opportunity to deliver a significant quantity of homes in a high quality, sustainable new community. The London Plan should reflect these matters clearly in relation to the Poplar</p>

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<p>Policy SD2 Collaboration in the Wider South East 57</p>	<p>Riverside Opportunity Area.</p> <p>This policy is a welcome step in the right direction towards a joined-up approach, as it provides a starting point for further discussion and cooperation, but lacks clout in the absence of robust statutory structures and government policy mechanisms: existing arrangements are clearly inadequate and there appears to be no appetite amongst local authorities to take some of London’s growth, due to political pressures and the lack of suitable opportunities to meet their own needs due to Green Belt / countryside constraints.</p> <p>The GLA should also lobby the government to develop an overarching spatial framework for the South East region as part of the government’s new national infrastructure and delivery plan, in terms of identifying the growth opportunities along the emerging development corridors to relieve the pressure on London’s already stretched inner boroughs.</p> <p>The list of regional and sub-regional challenges and opportunities should also include digital technology and high-speed rail.</p> <p>Paragraphs 2.2.6 and 2.27 – unnecessarily reiterates legislation / policy advice and in the final version should be deleted. Planning Policy Guidance is liable to change.</p>
<p>Policy SD3 Growth locations in the Wider South East and beyond 61</p>	<p>The key growth locations should be listed within the policy rather than the supporting text.</p> <p>We support the statement in 2.3.4 that the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital, but we consider this should be strengthened, as per comments provided against GG2.</p> <p>Figure 2.15 only lists airports and multi-modal ports; other types of strategic infrastructure are missing (e.g. HS2 and Crossrail 2) and the relationships between these corridors and key investments/growth opportunities are unclear at this stage. The corridors are very broad in scope and it is unclear on what the priorities are. As such, they lack clout as a plan making tool and it is unclear where they will be clarified at a strategic scale.</p>

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	<p>Duty to cooperate – it is unclear how the duty will be discharged. In order to give the policy teeth, the duty would need to apply to the London Plan in the same way as individual development plan documents. In doing so, the GLA should prepare a statement demonstrating how the GLA has worked cooperatively with local authorities and statutory in the wider South East region to address cross boundary issues.</p>
<p>Policy SD4 The Central Activities Zone (CAZ) 66</p>	<p>We support this policy overall but consider there are a few clarifications required.</p> <p>“Northern Isle of Dogs” – has caused local confusion as it is not recognised as a place as such. “Isle of Dogs (North)” is preferred.</p> <p>Paragraph 2.4.10 part c: The town centre network should also refer to Metropolitan Centres (such as Canary Wharf).</p> <p>Whitechapel is not a CAZ fringe area as such, given that it lies outside the CAZ. The plan needs to be clear on what is meant by ‘CAZ fringe’.</p>
<p>Policy SD5 Offices, other strategic functions and residential development in the CAZ 75</p>	<p>This policy aligns with our approach and is broadly supported. Part D of the policy should make it clear that this is referring to other parts of the City Fringe which are not part of the commercial core areas.</p> <p>Furthermore, it is not clear how “equal weight” will be applied on a case by case basis as to not undermine the strategic function of the CAZ given the pressure from developers to develop residential-led schemes in these areas. Does this mean no more than 50% residential per scheme? Further clarification should be provided.</p>
<p>Policy SD6 Town centres 78</p>	<p>The focus of the town centre policies appear sound, although we have concerns regarding residential-only schemes within town centres outside of primary and secondary frontages as this could impact neighbourhood centres especially.</p> <p>Part C should be caveated to make it clear that high density mixed-use development will be encouraged/supported in principle, subject to other considerations, such as the impact upon the character and historical significance of a location. Otherwise, there is a concern that such a policy will lead to a spate of ad hoc developments of varying scales and heights, bearing in mind that London’s town centres are often located in</p>

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	<p>sensitive areas. We would also consider there a need to prepare guidance to ensure that the design of new development in town centres is carefully coordinated from the outset, in the interests of good growth and place shaping.</p>
<p>Policy SD7 Town centre network 81</p>	<p>We support the upgrade of Canary Wharf from a Major Centre to a Metropolitan Centre.</p> <p>Crossharbour should be identified as a district centre as per the Local Plan; it is missing from figure 2.16.</p> <p>We note that the policy on supporting independent shops from the previous plan has been removed. What are the reasons for this change?</p> <p>The additional flexibility to look at how town centres are planned so they can make best use of space and facilities to create sustainable locations with active day and night time economies is particularly welcomed.</p> <p>Regarding Figures A1.2 and A1.3 (within the annex), the large symbols make it difficult to accurately determine the high, medium or low growth potential of town centres and distinguish between the district centres in the north west of the borough (because of their close proximity). The figures should be amended accordingly.</p>
<p>Policy SD8 Town centres: development principles and Development Plan Documents 86</p>	<p>Part A.2 of the policy seeks to resist out-of-centre development of town centre uses in line with the sequential approach with limited exceptions for existing viable office locations in outer London. However, exceptions should be made for small shops serving day-to-day shopping needs in opportunity areas and site allocations which will accommodate significant residential / office developments and local evidence demonstrates that it will not harm the vitality and viability of a town centre in line with the NPPF.</p> <p>Part A.2 is not sufficiently aligned with the principles set out in policy E9 (retail, markets and hot food takeaways) which permits small shops in large scale commercial developments outside of town centres and supports A1 retail uses within areas which are under-served in local convenience shopping and related services and support additional facilities to serve communities. In addition, policy E9 should make it clear that small shops will be permitted in large mixed-use developments including residential not just commercial uses.</p>

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	<p>As drafted, part 3 of the policy and the supporting text (paragraph 2.8.2) is not wholly consistent with paragraph 267 of the NPPF. Part A.3 implies that impact assessments are required on all proposals involving town centre uses which are not in accordance with the development plan, as opposed to developments over the 2500 square metre floorspace threshold. Is this a deliberate variation and if so, what is the justification?</p> <p>The terminology is confusing. Part B.3 requires local authorities to develop policies for the edge and fringes of town centres. In the context of the sequential test, the edge of centre is defined as a location that is well connected and up to 300 metres of the primary shopping area, which contains both primary and secondary shopping frontages. However, the next part of the policy refers to secondary frontages. Clarity is required on what areas should be the focus.</p> <p>Parts 4 to 6 – greater intensification of town centres is supported but in many cases detailed masterplans and strategies will be required to carefully coordinate mixed-use intensification of activity within these locations. Again, further guidance on how these masterplans should be prepared would be particularly welcomed, including a clearer steer on how the GLA will support local authorities in this process.</p>
Policy SD9 Town centres: Local partnerships and implementation 90	<p>We support the approach to Article 4 directions to remove permitted development rights given the significant pressure we have experienced for changes of use from town centre uses to residential uses within our centres. We are also supportive of, and developing plans for, a Town Centre Strategy and BIDs within the borough in order to provide a co-ordinated approach to addressing issues and managing town centres.</p>
Policy SD10 Strategic and local regeneration 92	<p>We are supportive of any approach which seeks to increase investment in areas of deprivation. However the London Plan should be explicit that regeneration should prioritise improvements for existing residents and that it encompasses a wide range of activities – not simply whole scale physical changes. We are supportive of the requirement for boroughs to develop locally sensitive policies, and we would focus on ensuring the long term affordability of housing and workspace as well as public realm and infrastructure improvements. It is our view that the supporting text for this policy should stress the broader definition of regeneration more explicitly. This would provide greater clarity on implementation and outcome expectation (for example, in terms of how a reduction in spatial inequalities will be measured).</p>

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	<p>In addition, the London Plan proposes multiple designations (OAs, SARs and LARs) and there is potential for confusion due to the extent of overlap, especially within Tower Hamlets. As shown on Figure 2.19, the geographical extent of the “strategic areas for regeneration” extends to most parts of the borough (apart from the Isle of Dogs and riverside areas): Tower Hamlets is effectively one designation. The designation of LARs would further add to the complexity of designations. Clarity should be provided on their purpose and the local discretion on how these designations are used and prioritised.</p> <p>Finally, implementation of this policy is very much dependant on a multi-disciplinary approach to regeneration involving a wide range of partners: it implies that spatial planning has a major role to play in coordinating regeneration activity within regeneration areas. However, many local planning authorities are already overstretched and any coordinating role will require significant additional revenue funding to enable local authorities to effectively carry out this role.</p>
Chapter 3 Design 97	
Policy D1 London’s form and characteristics 98	<p>We are broadly supportive of the approach in D1 but also note the emphasis on promoting growth without the specific objective criteria for assessing proposals that are contained in the current London Plan.</p> <p>It is likely that more development capacity will be discharged as a result of the policy and therefore stronger hooks to particular measureable characteristics may improve the council’s position in negotiating better design through the planning process. Currently there is a worrying presence of subjective characteristics whereas we need to have objective measures of quality components.</p> <p>Policy part B3 references ‘sustainability standards’, this should be defined to include air, climate and biodiversity objectives, and work alongside B 5) on urban greening.</p> <p>The policy makes a strong reference to using “land efficiently by optimising density” without recognising that different areas of London have different characteristics. Further comments are made in response to policy D6.</p>
Policy D2 Delivering good design 102	We have concerns about the overall approach to this policy, particularly with regard to the way that it seeks to replace detailed criteria for assessing the design of proposals contained in the current London Plan, with less

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	<p>objective measures such as design review panels and design advocates.</p> <p>Whilst we value the role that design review plays in the development management process, and therefore welcome the reference to it in this policy, we are concerned that it may be used to override the assessment of proposals against objective design policy and guidance. A key principle of design review is that it should be advisory; not making decisions, but offering advice to those that do. We suggest that the policy should explicitly make this point.</p> <p>There is also some concern about the potential for conflict between the views of different design review panels, and the possibility that planning applicants may shop around looking for support for their scheme. Tower Hamlets has its own design review panel, which combines professional expertise with local knowledge, making it best placed to consider development proposals in the borough. We suggest that the policy explicitly state that design review should ideally be carried out by a local panel. It is noted that the 'Mayor's Design Advocates' are referred to in paragraph 3.2.6 and not the policy itself, leading to concern about a lack of accountability and clear governance for such individuals. The draft Plan does not give sufficient detail on the scope of their role, their funding, governance and accountability, what they will be commissioning and research they will be undertaking.</p> <p>There is a dichotomy between open ended criteria contained in policy D1 and precise parameters of design codes / masterplans referred to in policy D2. There is no definition of the scope of design codes or masterplans, and the possible impact for areas that do not have a design code in place. It should also be noted that design codes / masterplans do not assure certainty of development.</p> <p>The policies as drafted seem to lack the clarity of criteria of what makes development 'good design' that is contained in the current London Plan. Existing London Plan policies 7.5, 7.6 and 7.7 have been removed and have not been replaced in the draft London Plan</p> <p>The assessment of capacity for growth required by policy D2 without local character indicators or healthy</p>

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	density matrix is unmeasurable, subjective and would put Councils under significant pressure to produce evidence and reference material to inform good design.
Policy D3 Inclusive design 106	We are broadly supportive of this policy as it should enable officers to better negotiate internal improvements which ensure developments are fully accessible. As a general comment the supporting text is far longer than previous and less concise, but easier to navigate due to bold text and bullet points. Paragraph 3.3.2 (the second sentence) contains an expanded repetition of the previous sentence.
Policy D4 Housing quality and standards 109	<p>While we are supportive of bringing housing standards into policy, from guidance, the detailed parameters are not supported as it provides a very simplified list of absolute minimum requirements which do not cover the whole spectrum of considerations or housing types. The standards proposed also appear to be very low. (Lower than evidence based London housing Design Standards from 2011).</p> <p>We strongly object not giving consideration for communal amenity space for flatted developments within the policy. The lack of requirements for provision of communal amenity space would be contrary to policy GG1 B in particular.</p>
Policy D5 Accessible housing 115	<p>We are broadly supportive of this policy and the increase from 90- 100% accessible and adaptable is welcomed.</p> <p>However we seek to encourage an approach which would require the provision of 2 lifts in the majority of cases to ensure true accessibility taking account of lift fallibility. In relation to this, clarity is also sought on the relationship with policy D11 Fire Safety which seeks safe exit for disabled residents.</p>
Policy D6 Optimising housing density 117	<p>We are not supportive of this policy due to the removal of the sustainable density ranges from the current London Plan.</p> <p>We acknowledge that the matrix may not have been a perfect tool, however the optimum density ranges that are provided by the current London Plan are useful assessing the development capacity and promoting the efficiency of public infrastructure investment.</p> <p>A lack of guidance regarding healthy density ranges would in our view result in further pushing for super / hyper densities in central areas (e.g. currently development in the Isle of Dogs is on average 5-7 times the highest</p>

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	<p>indicators in the density table) rather than rationalising development in outer London Boroughs. It is not our view or experience that hyper density development helps to deliver homes which meet London’s housing need. Hyper density developments have higher building costs and service charges reducing their affordability. The dominant typology of single tall buildings also reduces the ability to deliver mixed and balanced communities.</p> <p>Removing the matrix also risks enabling the maximisation of the densities of single developments at the expense of more comprehensive approaches risks adding to the piecemeal approach to the spatial structure of London.</p> <p>Furthermore the policy appears to place all the pressure of infrastructure development on local authorities, rather than requiring developers to deliver the infrastructure capacity needed to meet the additional pressure from their development.</p> <p>As outlined above, we do not consider that the proposed approach will lead to optimal housing delivery and, as a borough experiencing amongst the highest densities for new developments, we would welcome working together to develop a more suitable approach.</p>
Policy D7 Public realm 122	<p>We are broadly supportive of this policy, although some aspects would benefit from greater clarity.</p> <p>Clearer definitions are required of what constitutes unnecessary street clutter, and how this could be measured (i.e. the new style advert telephone boxes), given the policy has the potential to assist with managing the proliferation of street furniture.</p>
Policy D8 Tall buildings	<p>We are broadly supportive of this policy and the approach that suitable locations for tall buildings should be identified locally and the recognition of different local conditions.</p> <p>A number of different elements should be included in the requirements of impact assessments:</p> <ul style="list-style-type: none"> • light spillage in part C3 Environmental impacts • pressures on public realm and open spaces, development potential of adjacent sites in part C4 Cumulative impacts

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	We are not supportive of watering down the wording on access to top floors, the policy should apply to all tall buildings.
Policy D9 Basement development 131	We are broadly supportive of this policy. We do not face large numbers of applications for large basements (i.e. those that are multi storied or extend beyond the building envelope) but we are seeing increasing numbers in small domestic properties in heritage settings.
Policy D10 Safety, security and resilience to emergency 132	We are broadly supportive of this policy which replaces policy 7.13 in the current London Plan. However the policy has been updated to include additional information in relation to counter terrorism/resilience but has less emphasis on other forms of antisocial behaviour. For example there is no reference to lighting or blank frontages, although it is noted that natural surveillance is mentioned in policy D7 on public realm. It is noted that current policy 7.3 on designing out crime does not appear to have been replaced and as such the approach in the draft policies appear to be too narrowly focussed on particular elements of counter terrorism and other areas of security that would enable future developments to be resilient appear to have been neglected. This should be addressed.
Policy D11 Fire safety	<p>We are broadly supportive of this approach which introduces a specific policy on fire safety. Although this will be a new approach to refer to fire safety within a planning policy, it is felt that the requirements to establish a high standard of fire safety design for all developments and for a fire safety statement to be submitted with all major development proposals will mean that fire risk and fire safety can be considered at the earliest point in the development process.</p> <p>A number of aspects do require further consideration however, in particular relating to ensuring that planning officers and departments have the appropriate resources available for the assessment of proposals. This includes establishing the role of building control officers in providing expert advice on fire safety measures and fire safety statements for proposals that may or may not be built (consideration under the Building Regulations will still be needed at the relevant stage), whether the London Fire Brigade need to be resourced to provide advice at the planning stage and potential additional costs and delay for applicants due to the level of detail required at an earlier stage than the current arrangements.</p> <p>On a detailed point we feel that this policy should take the opportunity to provide a stronger stance on the need</p>

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	to incorporate sprinklers within new developments.
Policy D12 Agent of Change 136	We are supportive of this policy and the objective of embedding the agent of change principle into planning policy. It is an approach we have embedded in our own Local Plan.
Policy D13 Noise 139	We are supportive of this policy approach.
Chapter 4 Housing 143	
Policy H1 Increasing housing supply 144	<p>We are supportive of this policy approach, in particular the focus on intensification and delivery.</p> <p>We consider that the housing targets represent a more equitable distribution of housing growth which acknowledges land availability.</p> <p>We are also supportive that the policy clarifies the approach to industrial land and housing although we note there are still challenges resulting from the designation of industrial land as housing zone sites. It might be useful for the Plan to clarify that while all industrial sites could be redeveloped or intensified in order to also deliver housing, their industrial use should be primary in ‘retain / provide capacity’ boroughs.</p> <p>We think the policy requires clarifying in relation to Part 2a. In particular, whether there are any areas which are 800m of an underground / train station which aren’t within PTALs 3-6? Isn’t the PTAL rating sufficient? In addition we, along with many other boroughs, have a number of district town centres which are particularly poorly connected. It would be unsustainable for sites within these town centres to be developed as intensely as those which are much better connected. The policy should be reworded to clarify that optimisation should be in relation to the relative connectivity and functionality of the town centre.</p> <p>We would seek clarity on part C of the policy which requires boroughs to proactively use brownfield registers and permission in principle. We have concerns about the role and value of these documents within a London context, especially when the majority of boroughs have up to date Local Plans with site allocations and a positive approach to windfall residential development.</p> <p>As the GLA’s SHMA methodology has consistently noted, London’s housing market operates very differently and</p>

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	<p>a large proportion of our development comes forward on non-allocated sites. There is a real risk that making all potential housing sites public risks their development by increasing their land value. This is why the SHLAA has always used a probability approach to determining delivery and not made sites public. We are therefore confused by the inclusion of brownfield registers as a useful policy tool within this policy and H2.</p>
<p>Policy H2 Small sites 152</p>	<p>We are broadly supportive of the objectives behind this approach which seeks to better disperse housing delivery as well as speed up delivery by increasing the number of developers operating within London. We also acknowledge that our small sites target is relatively small and that we have been identified as a borough which already almost delivers small sites at a rate envisaged by the small sites modelling.</p> <p>However we are concerned about its deliverability as well as some of the implications, which could be wide-ranging given that most parts of the borough will lie within 800m of a tube or rail station and/or town centre boundary.</p> <p>Primarily, the delivery of homes on small sites will be time consuming for all elements of planning services. The creation of suitable design codes, especially in boroughs, like ours, with a number of conservation areas and numerous different housing typologies will require significant resources. The requirement in part C will also be particularly time consuming and as outlined in relation to H1 may actually have counterproductive consequences which may reduce deliverability. In addition this approach will be resource intensive for development management services (in many cases small sites involve a similar level of officer time – in particular due to the resident interest they attract – to far larger schemes, which deliver many more homes).</p> <p>We are also concerned that there are still significant barriers to SME builders entering this market.</p> <p>In addition we are concerned that when a significant amount of housing is going to be delivered through small sites it is likely this will reduce and delay the delivery of affordable housing, as this won't primarily be delivered on site but via cash in lieu receipts which have to be delivered by Councils, requiring additional resources to do so. It may also result in a predominance of small units, as these are disproportionately provided in smaller developments, risking undermining mixed and balanced communities objectives.</p>

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	<p>Part D should define what is meant by “vacant or underused sites” for the purposes of the policy. It should be specified that these sites do not include those currently or most recently in employment use to ensure that it does not conflict with other parts of the draft plan.</p> <p>In addition we are concerned about the potential design implications of what is being proposed and consider there may be a contradiction with GG2.c and D1-D4. In particular, the list of unacceptable harm criteria in H2 (E) is very limited. We note that no reference is given to townscape or local context or consideration for amenity, other than for privacy. Daylight/sunlight for example are not listed. The importance of good design, in particular daylight/sunlight and meeting housing standards, including the provision of private open space, is referred in paragraph 4.2.8 but not listed in the policy. These important elements of new housing developments should be given greater prominence and included in the policy wording, along with other important considerations (see below).</p> <p>Local character must be a material consideration for the design of development: existing character has got potential for growth even within the existing London Plan density matrix and there is no reason for piecemeal gradual deterioration of spatial character of places. Even small buildings have a significant impact on their surroundings (we have seen examples of applications on a garage site for a 9 storey block with one flat on each floor, in an area of two storey homes) and we consider the list of unacceptable harm criteria in H2 (E) is too restricted to ensure good planning. We recommend that the wording of part E of the policy is amended to read ‘designated heritage assets <i>and their settings</i>’. Consideration should also be given to restricting the presumption in favour of development where it would impact on locally listed buildings <i>and their settings</i>, and locally designated views.</p> <p>We also consider that clarity is required on the relationship between this policy and D8 Tall buildings. As outlined above, this policy could result in the development of buildings which meet the definition of tall buildings in 3.8.2. We consider that a further criteria should be added to Part F to exclude any developments which meet the definition of tall buildings, as these schemes should also have to meet the requirements of</p>

Policy Section	Consultation response
	<p>policy D8. Part F should also state that the policy does not apply in the borough’s site allocation areas to ensure that the ability of developments to deliver against strategic objectives is not compromised. Furthermore it should be specified that larger sites cannot be split into smaller parcels in order to benefit from this policy. There is a real risk that this policy could have an unintended consequence of encouraging piecemeal development of larger sites, rather than higher quality wholesale development.</p> <p>Clarity is also required on F7, as we presume this means that the presumption in favour of small housing developments should not be applied to estate infill schemes, as very few estate regeneration schemes would result in only 1- 25 homes.</p> <p>In order to improve the policy, we suggest widening the unacceptable harm criteria to include townscape, context and amenity considerations. In addition we consider that the policy should be restricted to small schemes, such as up to 10 units or up to 0.05 ha and only to schemes under 30m (through expanding the exceptions list in part F). As indicated above, we have precedents of super tall buildings on footprints of less than 0.1 ha which theoretically could meet the criteria listed in point F and would have a negative impact on amenity and townscape.</p>
Policy H3 Monitoring housing targets 159	<p>We are supportive of this policy approach, in particular the approach to student housing which more accurately reflects the impact of delivering student beds on conventional housing supply.</p> <p>We also note and endorse 4.3.3 which highlights some of the difficulties in applying the Government’s proposed housing delivery test in London. We recognise the role the GLA are playing in discussing this issue with MHCLG, but consider it is also important for boroughs to be involved in developing an alternative approach for London.</p>
Policy H4 Meanwhile use 160	<p>We are supportive of this approach and it is an approach our housing team are already exploring.</p> <p>However it may be useful to provide greater detail, or encourage boroughs to provide greater detail on how these are processed through the Development Management system – to allow adequate scrutiny of suitability whilst not being too onerous to prevent such development.</p>
Policy H5 Delivering	We are extremely supportive of the new higher affordable housing targets.

Policy Section	Consultation response
affordable housing 161	<p>It would be useful for the supporting text to clarify who ‘strategic partners’ are or could be.</p> <p>The policy needs to consider the monitoring of parts 3, 4 and 5. It is presumed that these portfolios could be across a number of boroughs and schemes and therefore it is unclear how boroughs are meant to assess any individual application from such an applicant in relation to meeting this target.</p> <p>Finally, the policy needs to consider the definition of public sector land. Is this any land which is or has been (in which case across what timeframe) in public sector ownership? In boroughs where a high receipt of where the delivery of affordable housing is a lower priority, the policy as currently worded risks the transfer of public sector land into Joint Purpose Vehicles or private ownership in advance of planning permission being sought.</p>
Policy H6 Threshold approach to applications 164	<p>We support this approach, and are starting to implement it.</p> <p>However, as indicated in our response to the Viability and Affordable Housing SPG we would like the proposal to be regularly reviewed to ensure it is an effective measure.</p>
Policy H7 Affordable housing tenure 169	<p>LBTH is broadly supportive of the new affordable products and have embedded them in our emerging draft Local Plan. However, as indicated in our response to the Viability and Affordable Housing SPG we do have a number of concerns, in particular in relation to London Living Rent (LLR).</p> <p>We acknowledge that LLR is an affordable product, in particular for residents who are unlikely to qualify for social rented housing but unable to afford market housing, for the years during which it is a rented product. However we are extremely cautious about how feasible it will be for residents to save sufficiently to purchase the property (or alternative property) within 10 years as in many parts of London the shared ownership cost will be far more expensive than the LLR.</p> <p>We are therefore very supportive of the inclusion of the review mechanism within the policy.</p> <p>Part B of the policy provides an extremely useful clarification in relation to the threshold approach however we</p>

Policy Section	Consultation response
	<p>are concerned that a similar requirement is not made in relation to policy H12 housing size mix. Given policy H12 indicate boroughs should determine a suitable mix for the social rented homes, the use of the threshold approach should also be contingent on meeting the required social rent housing mix, otherwise there is a significant risk that the social homes delivered through the threshold approach do not meet the full local affordable housing need.</p>
<p>Policy H8 Monitoring of affordable housing 173</p>	<p>We are supportive of the proposed monitoring and publication. We presume that this will form part of the London Development Database to ensure all boroughs provide the same information and it is clearly accessible to residents.</p>
<p>Policy H9 Vacant building credit 174</p>	<p>It is our view that Vacant Building Credit is an entirely unnecessary measure within our borough and the majority of London.</p> <p>We are already delivering a significant number of homes, all of which are on brownfield land and viability assessments are available where site specific constraints limit the delivery of affordable housing. The application of vacant building credit will simply reduce the provision of much needed affordable housing and not bring forward any more sites for housing.</p> <p>We are supportive therefore of this policy.</p>
<p>Policy H10 Redevelopment of existing housing and estate regeneration 175</p>	<p>We are supportive of the greater protection this policy affords to the retention of affordable housing.</p> <p>We note that it is the affordable housing floorspace that should be retained, rather than the unit numbers or mix. We recognise the value of retaining flexibility in the size of new units being brought forward but consider that there should be an explicit requirement for this to meet the borough's assessed affordable need (as outlined in local Strategic Housing Market Assessments). Otherwise there is a risk that much needed larger family affordable units are lost through regeneration schemes.</p> <p>In addition we consider the requirement for the delivery of 'additional affordable housing to be maximised' needs to make clear that this is in accordance with the local affordable housing mix (as per policy H7). There is a risk otherwise that the policy endorses a greater quantum of affordable units, but at higher rents.</p>

Policy Section	Consultation response
Policy H11 Ensuring the best use of stock 177	<p>We support the objectives of this policy and are glad that this issue has been acknowledged in the London Plan.</p> <p>However, we do consider there to be a strategic role in addressing this issue, in particular in relation to actions which could be taken outside of the planning system.</p> <p>We are aware that the Housing Strategy has a number of work streams which relate to this and these could usefully be referred to in the supporting text.</p>
Policy H12 Housing size mix 178	<p>We have a number of concerns in relation to this policy.</p> <p>Primarily we are concerned that it directs boroughs not to provide a housing mix requirement for market and intermediate housing. We recognise that part A highlights a number of factors, including the relevant SHMA, which should be considered when determining the relevant housing mix.</p> <p>However, a negotiated approach to housing mix becomes more difficult when it interacts with the threshold approach. Developers using the threshold approach are seeking flexibility in the housing mix they deliver before proceeding to use the fast track approach.</p> <p>Unless some guidance is provided on a suitable mix for market and intermediate tenures this risks an inconsistency of approach which may increase uncertainty for developers – the opposite of the objective of the threshold approach.</p> <p>A further risk is that the delivered mix doesn't meet housing need andacerbates existing market failure and inefficiencies, as well as risking mixed and balanced community objectives. Development viability will almost always result in the over provision of smaller units and given that the GLA SHMA indicates a far higher requirement for 3 bed +homes, than 2 bed homes, the resulting delivery is unlikely to meet assessed need.</p> <p>We are concerned by the view expressed in 4.12.3 that two bedroom homes should be taken into account as a form of family housing, as this risks embedding overcrowding in future stock. We would also be interested in any evidence to support the statement in 4.12.4 that downsizing is statistically significant enough to justify over</p>

Policy Section	Consultation response
	<p>providing smaller units.</p> <p>We are sympathetic to the view that a degree of flexibility should be applied to the housing mix which would take into consideration location, predominant mix in an area and the nature of the development, however this should still be within a set framework.</p> <p>Finally, given the policy does indicate boroughs should determine a suitable mix for the social rented homes, the use of the threshold approach should also be contingent on meeting the required social rent housing mix and this should be explicit in the policy, otherwise there is a significant risk that the social homes delivered through the threshold approach do not meet the full local affordable housing need.</p> <p>We therefore consider that greater consideration of the interaction between housing mix and the threshold approach should be considered in this policy and that boroughs should be encouraged to create mix frameworks to provide certainties to developers.</p>
Policy H13 Build to Rent 180	<p>We consider this policy responds to a number of concerns we had in relation to the Affordable Housing and Viability SPG.</p> <p>In particular by allowing boroughs to stipulate the affordable housing requirement from such schemes, we can ensure that the delivery of this housing typology doesn't undermine the delivery of affordable housing. Whilst the policy indicates an expectation that boroughs will allow a percentage of affordable housing with a smaller market discount, it would be possible for boroughs where the gap between market values and affordability is larger to require the same affordable housing mix as for market sale housing developments. We also read paragraph 4.13.3 to mean that boroughs could require a range of affordable products – not just discounted market rent. We are supportive of this flexibility as it is our view that larger build to rent scheme, are just as able to provide London Affordable Rent products delivered by a registered provider, as a build to sell scheme.</p> <p>The policy should also confirm that where affordable housing is delivered in such a scheme it should be allocated via local authority nomination. As stated in the NPPF definition, 'Affordable rented housing is let by local</p>

Policy Section	Consultation response
	<p>authorities or private registered providers of social housing to households who are eligible for social rented housing'. Therefore for any housing delivered through build to rent to meet the definition of affordable housing, it must be allocated to those who are eligible. This eligibility can only be determined by a local authority against their agreed housing allocation policy.</p> <p>The policy is also still silent on space standards. We would presume this form of development would also have to meet the standards outlined in policy D4. We think this should be made explicit within the policy.</p>
Policy H14 Supported and specialised accommodation 185	<p>We are supportive of this policy and the objective to support the delivery and retention of a wide range of accommodation.</p> <p>We note that HSCLG are currently consulting on proposals regarding Funding for Supported Housing and which also proposes to require local areas to undertake detailed needs assessments of need for this type of housing. It would be useful for the GLA to clarify their expectation of their role vs boroughs' roles in relation to this.</p>
Policy H15 Specialist older persons housing 186	<p>We are supportive of this approach and consider it positive to have specific guidance for the provision of affordable older peoples housing.</p> <p>We would ask for clarity on how the methodology of assessing older people's housing need has changed, as our need has significantly reduced since the 2016 London Plan and it is unclear why.</p>
Policy H16 Gypsy and Traveller accommodation 190	<p>We are supportive of this policy and consider it extremely positive that Mayor of London acknowledges wider housing requirements of gypsy and travellers.</p> <p>However given the difficulties many (in particular inner and central) London boroughs have in finding suitable locations for additional sites and pitches (which will be exacerbated by the new London Plan land intensification approach), it is considered that the London plan should play a role in identifying suitable locations to meet London's needs (with a recognition of the preference to maintain local links).</p>
Policy H17 Purpose-built student accommodation 193	<p>We are supportive of this policy approach, in particular the strengthened requirement for the provision of affordable student housing and the further detail provided on the setting and operation of the affordable housing requirement.</p>

Policy Section	Consultation response
	<p>We are also supportive of the acknowledgement of existing concentrations in central London and the policy approach to direct student accommodation away from these locations.</p> <p>However we consider that ‘locations well connected to local services by walking, cycling or public transport’ should be better defined. This could be in relation to PTAL, a set distance or in relation to town centres etc. The current phrasing is too open to broad interpretation of suitable locations.</p>
<p>Policy H18 Large-scale purpose-built shared living 197</p>	<p>We are supportive that the London Plan is addressing this new typology and that it is explicitly requiring that it meets an identified market need and that it also contributes towards the delivery of affordable housing. We have had applications which indicated that they consider themselves to deliver a form of affordable housing however it is clear from the proposed rent levels, which often includes a high service charge to cover additional social facilities, that this would not meet the requirements of our preferred product mix.</p> <p>We note that the policy proposes that the contribution towards affordable housing should be via cash in lieu. It is our view that larger schemes, are just as able to provide London Affordable Rent products delivered by a registered provider, as a build to sell or rent scheme. We suggest removing this level of detail on how the affordable housing contribution should be delivered and allow local discretion, as long as it delivers the equivalent of 35% of units to be affordable.</p> <p>The ability for boroughs to require schemes to deliver affordable housing on site is of particular importance for ensuring mixed and balanced communities. One of the local concerns regarding this form of development is that by creating a self-contained community with a wide range of facilities / amenities within the building, it limits social interaction between residents within an HMO and those within the wider area. We note the wording in 4.18.5 which seeks to encourage social interaction but we consider that the 4th bullet point should be strengthened so that it should be a default position that the public amenities should be open access and that this should be clearly demonstrated through their design.</p> <p>We have concerns about the standards of developments which are being brought forward and whether they</p>

Policy Section	Consultation response
	<p>provide sufficient space for medium / long term living. Whilst we acknowledge this is a new typology and therefore there is a lack of evidence to justify specific space standards, we consider it extremely important that some amenity standards apply, including minimising north facing units (given it is highly likely they will all be single aspect), ensuring adequate daylight and sunlight etc. We anticipate that residents may live in these units for the medium / long term and they should not be considered in a similar manner to student housing where sub-standard accommodation is tolerated. In effect it also creates an incentive away from delivering high quality C3 units if they face any constraints on meeting design benchmarks, towards delivering an HMO scheme where the standards are lower. We would strongly encourage the GLA to develop more detailed standards guidance to avoid this.</p>
Chapter 5 Social Infrastructure 201	
Policy S1 Developing London's social infrastructure 202	This policy is supported, in particular the needs assessment and area-based planning for social infrastructure in areas of major new development.
Policy S2 Health and social care facilities 204	<p>The policy supports innovative approach to new models of care, which is supported.</p> <p>We support the proposal for Boroughs to work alongside CCGs / NHS / community organisations to identify and address local health and social care needs within Development Plans.</p> <p>The new policies also support a more flexible approach through integration, co-location or reconfiguration to release of surplus buildings and land for other uses. This should be done with particular care to ensure that LA's opportunities to address current and future needs are not compromised by change of use from health facilities to other types of uses. In addition, co-location should consider suitable types of uses to avoid conflicts of impacts associated with those types of uses – e.g. noise, pollution etc.</p> <p>However, the policy removes the requirement for any replacement health service to be operational before the facilities they replace are closed. This is considered a risk to the continuous adequate provision of needed health</p>

Policy Section	Consultation response
	facilities and the previous wording should be reinstated.
Policy S3 Education and childcare facilities 208	<p>Consideration should be given to the extensive use of public open spaces by schools and the resulting overuse. It should be made clear that proximity to parks does not compromise the requirement or provision of adequate play space on the school site.</p> <p>New policies encourage nursery provision within primary schools, where there is a need, which is in line with our new Local Plan and therefore supported. In addition, nursery and other pre-school provision (places for 2 year olds) should also be encouraged within ground floor uses in a range of locations to increase provision. It should also be noted that locating schools and nursery provision away from busy roads and next to parks are not necessarily the key drivers of school location. Whilst these are factors which do impact on the design of provision, the main driver must be local demand for provision, with primary schools within walking distance and secondary, ideally located to meet centres of demand but not so close to other existing provision that patterns of application are significantly adversely affected.</p> <p>We endorse linking development proposals for education to existing footpath and cycle networks to create healthy routes to schools.</p>
Policy S4 Play and informal recreation 212	<p>This is supported, however it would be useful to provide more guidance on what ‘likely to be used by children and young people’ means.</p> <p>The policy should be strengthened by referencing anticipated child yield. In addition, as the GLA’s current play space calculator has a number of statistical weaknesses (based on data which is ten years old, a small sample and from only one London borough) will this be updated or will the policy encourage boroughs to develop their own?</p>
Policy S5 Sports and recreation facilities 214	<p>Stronger emphasis on promoting walking and cycling is supported.</p> <p>New policies justify the loss of sport facilities by the lack of current and future need. We are concerned that this may result in the loss of sport facilities for other types of uses. It is recommended that where the loss of a sport facility is justified by the lack of need, it should be replaced by an alternative community facility in line with</p>

Policy Section	Consultation response
	<p>policy S1.</p> <p>We support the proposal to increase opportunities for play to enable CYP to be more independent and support development of accessible routes to promote play provision.</p>
Policy S6 Public toilets 218	Policy objectives are supported although it is considered that the policy requirements go beyond the scope of a strategic planning document.
Policy S7 Burial space 219	This policy is supported.
Chapter 6 Economy 223	
Policy E1 Offices 224	<p>We support the overall policy approach.</p> <p>We support bringing forward Article 4 directions, and emerging work to provide justification will be beneficial to inner London boroughs.</p> <p>We have concerns with the reference to change of use of surplus space (Part E), which requires greater clarity and guidance on how this surplus should be determined or evidenced, in order to avoid undermining other policies and our own Local Plan position.</p>
Policy E2 Low-cost business space 227	<p>We support the overall approach and concept of low-cost business space approach but some clarifications are required.</p> <p>How is 'low cost' defined and how has the plan derived at 2500sqm (part C) – this is more than a major but not strategic?</p> <p>Given that there is no formal requirement to provide low-cost workspace in accordance with part C (and that the proportion is left to individual developments), it is questioned how this policy can be effectively delivered.</p> <p>Regarding Paragraph 6.2.6, we have concern with the reference to 'obsolete or surplus to requirements' which requires greater clarity and guidance on how this is determined or evidenced, to avoid undermining other</p>

Policy Section	Consultation response
	<p>policies and our own Local Plan position. The definition and tests surrounding ‘obsolete or surplus to requirements’ must be as robust as possible, should we require landowners to market the site, not just the existing premises, for employment use prior to granting permission for redevelopment to residential.</p>
<p>Policy E3 Affordable workspace 230</p>	<p>We support the overall concept of affordable workspace, although we have concern about how affordable workspace can be secured in the long term in line with criteria 1 – 5 in part A.</p> <p>Currently, the concept of affordable workspace is very broad and relatively new/untested in planning policy terms. The idea of affordability is rudimentary, and it is unclear why/how the categories in E3A are selected. Given the gap in knowledge in this area, the policy should go further to provide guidance and clarify other important aspects of affordable workspace in relation to discount levels, space management, viability implications, affordability models etc.</p> <p>In addition, we suggest that the proposed categories of what companies should benefit from affordable workspace should be expanded to include employment space for sectors which would diversify the employment base in the local area. In particular where they provide skilled or semi-skilled roles paying the London Living Wage.</p>
<p>Policy E4 Land for industry, logistics and services to support London’s economic function 232</p>	<p>We strongly support the overall approach of this policy.</p>
<p>Policy E5 Strategic Industrial Locations (SIL) 239</p>	<p>We support this policy and clearer definitions provided. However we do recognise that challenges arise from the changing context around these SILs, in particular Empson Street which is part of our Housing Zone and Hackney Wick, and that the policy should support the transition within SILs to industrial uses which are more compatible with residential uses.</p> <p>We note the Industrial Intensification Primer and consider it may be useful for the GLA to further consider ways in which industrial and residential development can be designed so as to reduce tensions and conflicts between</p>

Policy Section	Consultation response
	<p>uses.</p> <p>Please note, Figure 6.2 needs reviewing, for example, no 35 is shown on Isle of Dogs and should be in Greenwich.</p>
Policy E6 Locally Significant Industrial Sites 245	We support this policy.
Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function 246	<p>We support this policy in general, although further work is needed regarding development plan points (part F). We would also welcome more guidance regarding the approach to intensification of industrial land.</p> <p>We also have local experience of the intensification of industrial space and co-location of housing which has resulted in challenges for residents. Further guidance is required on ensuring residential developments within industrial designations are high quality living environments and that sufficient management is in place to resolve problems following occupation. A recognition of these challenges should be reflected in this policy.</p>
Policy E8 Sector growth opportunities and clusters 252	We support this through our policies
Policy E9 Retail, markets and hot food takeaways 256	<p>We support this policy in general and would welcome the GLA's evidence behind the 400m figure for our own evidence. In LBTH, mapping was undertaken to evaluate concentration at 400m and 200m and it was deemed a 400m exclusion zone would not be applicable because it would exclude new applications from most of the borough.</p> <p>We support proposals to consider where appropriate to manage over-concentration of A5 uses through the use of locally-defined thresholds and we are also supportive of the need to achieve, and operate in compliance with, the Healthier Catering Commitment standard or locally identified equivalent schemes such as Tower Hamlet's Food for Health Awards.</p>

Policy Section	Consultation response
Policy E10 Visitor infrastructure 261	<p>We support this policy, although we have some concern over serviced apartments. The policy seems to be too permissive of serviced apartments which could potentially undermine housing/job targets, particularly if the pressure for this type land use continues as it has done within LBTH. Further guidance should be provided in the supporting text to provide greater clarity on how to ensure the delivery of apart-hotels and short-term lettings do not compromise housing provision (part F). H11 seems to only provide guidance on a unit by unit basis or for the conversion of residential to short-term lettings. Protection should also be given to sites which should be prioritised for housing development, rather than short-stay accommodation.</p> <p>There are also no figures provided for additional accessible bedroom requirements.</p>
Policy E11 Skills and opportunities for all 263	<p>The general premise of the policy is supported, although cross borough working on employment and entertainment opportunities should be reworded to recognise local circumstances. For example, LBTH has high levels of growth and employment opportunities, however local employment rates are lower than London average - it is therefore important that local people are prioritised for local opportunities. However it is recognised that other boroughs may be in a better position to widen access to their opportunities.</p>
<p>Chapter 7 Heritage and Culture 267</p>	
Policy HC1 Heritage conservation and growth 268	<p>Overall we are not supportive of the approach contained in this policy, although the emphasis it puts on having good information and a conservation strategy is helpful as we have a recently adopted conservation strategy.</p> <p>The policy seems to have moved away from ensuring that development respects and integrates with the historic context, and towards development which protects heritage as a result of its quality. The existing policies feel more objective, whilst these changes feel like they can be used to justify proposals purely on design quality and are therefore more subjective. The integration of proposals with their context and design quality are not mutually exclusive aspects of an application, but rather are complimentary.</p> <p>There is also less about local character in the new plan than in the current one. Formerly in one policy it has now been distributed and is covered in a number of policies, this feels like a dilution (see H2B1). It is suggested that 'sensitive' might be a better word to replace 'innovative' in policy B3.</p>
Policy HC2 World	<p>This policy is broadly supported as it provides more support for identifying local views which we have done</p>

Policy Section	Consultation response
Heritage Sites 278	through the Regulation 19 draft Local Plan
Policy HC3 Strategic and Local Views 280	<p>We are broadly supportive of this policy as it provides more support for identifying local views. However, it would be very useful to make clear in the London Plan:</p> <ul style="list-style-type: none"> - criteria why views and landmarks should be protected - what are objectives of protection - what a development is expected to consider in order to address designation.
Policy HC4 London View Management Framework 285	We are broadly supportive of this policy.
Policy HC5 Supporting London's culture and creative industries 287	We support this approach and consider it aligns with our approach and provides useful additional content on temporary uses/vacant properties
Policy HC6 Supporting the night-time economy 292	The policy aligns with our approach to address cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing.
Policy HC7 Protecting public houses 297	We support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.
Chapter 8 Green Infrastructure and Natural Environment 301	
Policy G1 Green infrastructure 302	<p>New policy requires LA to develop green infrastructure strategies, looking at wider green infrastructure elements, including open space, biodiversity, health and wellbeing etc. This is supported as it will provide a more coordinated and holistic approach where different elements of green infrastructure are considered. Further guidance on the development of green infrastructure strategies is essential to ensure consistent approach across boroughs.</p> <p>Further details are needed to highlight the relationship between development pressure and delivery of green infrastructure.</p>

Policy Section	Consultation response
	<p>It should be clarified that the requirement isn't restricted to deficit areas but it should include a more specific mention of deficit areas. E.g. The supporting text should be explicit that 'environmental challenges' includes open space deficiency.</p> <p>The policy should include reference to the All London Green Grid.</p>
Policy G2 London's Green Belt 303	<p>We are sympathetic to the Plan's broad policy objective to meet London's growth within London's boundaries. However we do not consider this to be the most sustainable spatial strategy. We consider that the GLA could undertake a strategic review of the greenbelt with a view to releasing low quality and well-connected areas for planned growth. This could help make transport provision in outer London more sustainable as well as reduce the risk of over development in central London.</p>
Policy G3 Metropolitan Open Land 304	<p>The policy is supported, however further clarification is required for Part D4 which is currently very confusedly worded – it doesn't add anything to the policy and could be added to the supporting text.</p>
Policy G4 Local green and open space 305	<p>Stronger support for the creation of publicly accessible open spaces is welcomed.</p> <p>Unconditional protection of open spaces in areas of deficiency is welcomed as it strengthens our ability to prevent loss in areas of deficiency.</p>
Policy G5 Urban greening 308	<p>The new and innovative approach to quantifying required greening is supported. However, there is a risk that it creates a ceiling rather than a floor for provision by developers – the policy must not undermine boroughs' ability to secure more than baseline provision for a site. In addition, further guidance is required on the urban greening factor, its weighting criteria and application.</p> <p>Scoring criteria should also be included for the post development stage to ensure maintenance.</p> <p>The scores given to the different green elements should be clarified. It is not clear why intensive green roof score more than perennial planting, when these are effectively the same habitat at different levels? Why are</p>

Policy Section	Consultation response
	hedges so low? What area is being measured for a green wall – the vertical or horizontal? And why should semi-natural vegetation or wetland have to be “created” on site rather than retained?
Policy G6 Biodiversity and access to nature 311	<p>We generally support the policy however consider it to have a number of strange omissions. We are particularly concerned that the policy doesn't seek net gains or even no net loss (as per NPPF) for biodiversity.</p> <p>We are unsure what is meant by the term 'urban context' in part B3. If this term is to be used it requires clarification in the supporting text. We would consider a preferred term to be 'the local context' given the range of biodiversity contexts within London. We are concerned that this clause contains no reference to the London Biodiversity Action Plan or Local Biodiversity Action Plans, and suggest adding 'taking account of priorities identified in the London and local Biodiversity Action Plans'.</p> <p>Part B1 states that boroughs should identify 'green corridors', but there is no further mention of these in Parts A and C or the supporting text, so it is not clear what status these have once they have been identified. Green corridors are given a degree of policy protection in the current London Plan. A further clause on encouraging connectivity should be reinstated.</p> <p>Finally, part C should be clear that where the benefits of the development proposal do not outweigh the biodiversity impacts, the scheme can be refused. It should also reference cumulative harm to a SINC.</p> <p>Paragraph 8.6.1 should include a requirement for a development to demonstrate it won't have an impact on the integrity of the site's conservation status, the third test required under the Habitats Directive.</p>
Policy G7 Trees and woodlands 313	We support the policy and in particular the ambitious objective to increase the 'urban forest'. However it is concerning that the policy doesn't stress the irreplaceable nature of ancient woodland and veteran trees. We recommend adding at the end of Part C: 'Removal of veteran trees should be resisted other than in exceptional circumstances', and adding a paragraph in the supporting text about the irreplaceability of ancient woodland and veteran trees. It should reflect the NPPF.
Policy G8 Food growing 315	Policy is supported

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Policy G9 Geodiversity 316	Policy is supported
Chapter 9 Sustainable Infrastructure 319	
Policy SI1 Improving air quality 320	<p>We are generally very supportive of this policy. A stronger emphasises on air quality improvements within areas having large scale development will be of benefit to LBTH residents. We welcome any further improvement to air quality, including the concept of air quality positive, but we note that there is no detail on what this standard would include.</p> <p>In addition, we have a number of suggestions and comments.</p> <p>The policy should be clearer about refusing permission where either ‘unacceptable’ levels of exposure cannot be mitigated (in particular where the site is in or boarded by an area of exceedance of the Air Quality Standards Regulations) or where air quality neutral cannot be achieved.</p> <p>The policy should also make it clear that mitigations to exposure to which seal people within their own homes without access to openable windows should be resisted or used as in the last instance.</p> <p>The policy should require consideration of cumulative impacts.</p> <p>The supporting text refers to ‘smart infrastructure such as sensors’. Accuracy of such sensors are currently very suspect. The supporting text should be supporting accurate and reliable monitoring.</p>
Policy SI2 Minimising greenhouse gas emissions 324	<p>LBTH has the third highest carbon emissions of all London boroughs and is very keen to reduce this. We consider it extremely positive that there is a regional commitment to this in light of national government’s lack of guidance.</p> <p>However, there are a number of specific concerns we have about the policy.</p> <p>Part B monitoring requirements – in order to ensure a consistency of approach and quality – guidance should be</p>

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	<p>provided on what will be expected from developers.</p> <p>Part C2's provision for off-site carbon reductions may be problematic as may require a high level of monitoring and scrutiny to ensure this isn't resulting in effective double counting – i.e. an energy efficiency scheme which already has business benefits or an RSL counting a boiler upgrade for existing residential developments which they would already have had to deliver to fulfil their duties under the Housing Act.</p> <p>In relation to the new guidance and requirements for energy assessments, we are concerned by the requirement for 5 year monitoring (see comment above). We consider it would be useful to provide greater detail in relation to provision (i) - which is currently extremely open ended and open to a wide range of interpretations. We would consider that provision (k) should be the basis of its own policy, not a small clause within the supporting text. We are concerned by the loss of the sustainable construction policy. Finally (l) should provide further details on a standard approach to how costs should be broken down and how it should be calculated to provide a transparent approach. Guidance should also be provided on what, if any weight, should be attached to this information.</p> <p>Finally, it would be useful to clarify why the viability assessment assumed a £95 carbon offsite price and if it is anticipated that boroughs should adapt this value.</p>
Policy S13 Energy infrastructure 329	<p>We consider it positive that the policy has been significantly expanded. However we note that boroughs are being encouraged to engage with energy companies, however very limited guidance is provided in relation to this. We would presume this would be through Local Plan production, so that energy companies are aware of expected growth areas and quantum, while we would expect developers to continue lead on engaging with energy companies regarding their individual developments. This should be confirmed and clarified.</p>
Policy S14 Managing heat risk 334	<p>We are supportive of the policy objectives however we consider it would be beneficial if they could provide guidance on using the CIBSE guidance and in particular how trade-offs between low carbon commitments and cooling requirements should be managed.</p>
Policy S15 Water infrastructure 336	<p>The policies are again largely positive and reinforce the importance of sustainable drainage measures to improve resilience and reduce the need to undertake infrastructure projects.</p>

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	<p>We would also encourage a strategic role for the GLA to ensure delivery of sufficient water and sewage capacity, especially in opportunity areas.</p>
<p>Policy SI6 Digital connectivity infrastructure 341</p>	<p>Were this policy to include (where appropriate) explicit targets for minimum standards that should be met by all new developments, then this would result in the policy having a greater focus and more successful outcomes</p>
<p>Policy SI7 Reducing waste and supporting the circular economy 344</p>	<p>The proposed policy will further assist in the reduction of waste which is supported.</p> <p>However, the Municipal Waste recycling target that the Mayor of London has set is going to be very challenging for Tower Hamlets. The borough is disadvantaged in terms of the current recycling performance measure on household waste because we do not have the quantities of green waste that many London boroughs are able to capture to increase their recycling performance. The Council has quite a large Commercial Waste portfolio and with the current recycling performance measure relating to household waste only there will be some work to be done to raise the level of awareness within the business community in order that performance against the Municipal Waste measure can be improved.</p> <p>It should be recognised that moving towards a more Circular Economy and the potential of Extended Producer Responsibility being introduced, covering additional waste/materials, the composition of Municipal Waste could change with the resultant loss of some materials that would otherwise have contributed towards the performance measure. This could adversely impact Local Authorities ability to achieve the higher targets that are being set.</p>
<p>Policy SI8 Waste capacity and net waste self-sufficiency 347</p>	<p>We acknowledge the lower waste apportionment targets and support the principles of net self- sufficiency. However, we would be seeking a drastic reduction to our apportionment target given the fact that we have considerable development pressures and land use tensions, such as 3 opportunity areas, housing targets that are amongst the highest in London, employment targets, Strategic Industrial Locations as well as business functions that are similar to that of the City of London. As a result of our apportionment target we are required to safeguard land which is currently not being used as efficiently as it could be and where a transition to other uses could better meet the strategic objectives for that area.</p>

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	<p>We also face an additional challenge from the division of functions between us and the London Legacy Development Corporation, which is a planning, but not a waste, authority. This leads to further difficulties in meeting our apportionment target. For example, the GLA's response to a recent application (the McGrath site) may undermine our ability to meet the GLA's own target.</p>
<p>Policy SI9 Safeguarded waste sites 355</p>	<p>We do not consider this policy adequate as it is our view that compensatory capacity should be based on the maximum throughput (or more) achieved in the last 5 years or be based on a throughput between 45,000 and 65,000 tonnes per hectare per annum.</p> <p>The GLA should act as a broker/facilitator in re-allocating apportionments where a waste site is lost in a borough. This should be reflected in the supporting text.</p>
<p>Policy SI10 Aggregates</p>	<p>The aspiration for recycling C, D& E waste is supported, in principle, however the monitoring will prove to be challenging. The proposed policy is silent on emphasizing support for aggregates recycling facilities, subject to local amenity conditions.</p>
<p>Policy SI11 Hydraulic fracturing (Fracking) 358</p>	<p>Whilst not of relevance for LBTH, we are supportive of this policy.</p>
<p>Policy SI12 Flood risk management 359</p>	<p>This is largely positive and recognises the importance of defence raising/land setback for tidal flood risk management (TE2100).</p>
<p>Policy SI13 Sustainable drainage 361</p>	<p>The policy is welcomed especially the improvement made to the drainage hierarchy. However we are concerned by the wording used in 9.13.1 which implies that the LLFA are now responsible for the management of maintenance arrangements, which is incorrect as we only review arrangements rather any formalised management of 3rd party SuDS. We welcome the intention and its importance but would suggest it rewritten to make clear that it is incumbent upon the applicant to have robust maintenance arrangements in place.</p> <p>We are also concerned by the removal of the 50% minimum expectation, which whilst it was used as an arbitrary limit regardless of site conditions, it did ensure legitimate grounds for objection. In contrast this policy</p>

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	may now create an environment whereby developers may demonstrate less reduction due to technicalities and constraints and it will be up to LPA and consultee to challenge this on a case by case/ engineering judgement.
Policy SI14 Waterways – strategic role 363	Policy is supported and it aligns with the objectives of Tower Hamlet’s new draft local plan to promote the borough’s water spaces for water related uses.
Policy SI15 Water transport 368	The stronger emphasis and protection given to river transport capacity and sustainable freight is supported.
Policy SI16 Waterways – use and enjoyment 371	<p>We have a number of concerns regarding this policy as the new policy’s approach is more permissive to mooring developments. There is a risk that this may result in increased pressure on the borough’s water spaces and negatively affect the public benefit of open water spaces enjoyment. Part D.1 should include that moorings should be located at appropriate locations with wider considerations than just navigation.</p> <p>Parts B and D.1 needs to include reference to biodiversity – should state impact on navigation <u>or biodiversity</u>.</p> <p>Further clarity and a clear definition should be provided on the ‘cultural, education use’ to ensure that these uses are water related in nature.</p>
Policy SI17 Protecting London’s waterways 373	<p>Waterways should be protected however there should also be a policy that recognises that this protection should not impede the construction of other strategic infrastructure crossing waterways.</p> <p>Given the borough has a significant amount of waterfrontage and high levels of development, a strengthening of planning policy protecting the character, openness and appearance of waterways from inappropriate development is welcomed.</p> <p>The policy should also be amended to include that developments should enhance the water environment, including biodiversity.</p>
Chapter 10 Transport 401	
Policy T1 Strategic approach to transport	We support the bolder steps towards sustainable transport and modal shift in accordance with our local plan. However we are concerned about the delivery impacts of these policies following local experience. This in

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402.	particular relates to the difficulties we face in letting affordable housing units in car free developments even to families moving from severely overcrowded or unsuitable properties.
Policy T2 Healthy Streets 403	We support healthy streets as a concept but further clarification is needed on prioritising amongst the 10 healthy streets priority areas and how to assess this in planning applications. How will this be weighted? We would like to build on the Healthy Streets tool by weighting the prioritisation of the ten criteria against local health needs data and the development of a local algorithm to enhance its local application.
Policy T3 Transport capacity, connectivity and safeguarding 406	We support maintaining policies that safeguard existing land and buildings for transport functions and the specific links to the assessment of new development to prioritise the delivery of key infrastructure including the Elizabeth Line and underground connections.
Policy T4 Assessing and mitigating transport impacts 412	We support this policy in principal but question if it is robust enough to direct a refusal on inadequate transport capacity grounds.
Policy T5 Cycling 414	<p>In principle we are supportive of high cycling standards, but the policy should be clarified to indicate how boroughs should consider developments which are unable to deliver such a high level of cycle parking.</p> <p>We are concerned that the current wording would encourage developers to push cycle parking on the street.</p>
Policy T6 Car parking 420	We support this approach but are concerned that the generous allowances in low PTAL areas in Outer London may still impact on our network and the 80% target.
Policy T6.1 Residential parking 423	Generally support the promotion of car free development in the borough (barring comments in relation to T1) and residential blue badge parking in accumulation may have significant impact on use of kerbside space on our highway which may need to be managed.
Policy T6.2 Office parking 426	Support this policy as helps with managing growth in car traffic during peak times.
Policy T6.3 Retail parking 427	We are concerned by this policy as the maximum standards are too high across outer London and may mean that big box retail provision in outer London acts as a significant draw for car users – leading to an increase in traffic in our borough as well as surrounding areas.
Policy T6.4 Hotel and	Support and is unchanged from 2016 plan.

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leisure uses parking 428	
Policy T6.5 Non-residential disabled persons parking 429	Support although more clarity is needed on minimum level of provision where no general car parking is proposed.
Policy T7 Freight and servicing 430	Support as is in line with borough objectives.
Policy T8 Aviation 433	No comment.
Policy T9 Funding transport infrastructure through planning 436	<p>The Council is supportive of the principle that contributions from MCIL2 can be spent on other strategic transport projects. The Council does not support the disproportionately high charge proposed to be applied to commercial development in the borough; the Council has submitted a representation in this regard to the consultation on the Mayor of London's new Preliminary Draft Charging Schedule.</p> <p>Given that the level of London Mayoral CIL in Tower Hamlets is the highest within the entire of London, should the levels of development continue, it would not be unreasonable for there to be an Eastern spur to Crossrail 2 which would pass through the borough.</p>
Chapter 11 Funding the London Plan 439	
Policy DF1 Delivery of the Plan and Planning Obligations 441	<p>Support parts A, B and C and suggest addition to wording (See additional box below).</p> <p>Parts D and E: The Council finds the prioritisation of affordable housing and strategic transport in terms of planning obligations to be problematic. This could lead to underfunding of health, education and other infrastructure which has consequences for the sustainability of development.</p> <p><u>Suggested wording for Policy DF1</u></p> <p>DF1</p> <p>A. Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there</p>

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	<p>are clear circumstances creating barriers to delivery.</p> <p>B. If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. <u>In addition, viability can only be considered on a site specific basis where the proposed scheme varies significantly from any scheme on the site in question that was viability tested as part of the evidence base supporting the relevant Local Plan.</u></p> <p>C. Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor’s Affordable Housing and Viability SPG.</p> <p>D. When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</p> <ol style="list-style-type: none"> 1. Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2. Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth. <p>E. Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list</p>
Chapter 12 Monitoring 457	
Policy M1 Monitoring	<p>We support the monitoring requirements but would welcome clarity on the different types of monitoring boroughs are expected to provide to the GLA and how they could be brought together to reduce duplication. E.g. London Development Database data, Environmental data (including Air Quality Monitoring data) and health data.</p>