

Comments

Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits (11/11/16 to 02/01/17)

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:12
Consultation Point	CHAPTER 1 INTRODUCTION (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

These are the overarching comments of Friends of the Earth Hackney and Tower Hamlets on the draft Local Plan.

We welcome the ambition of the Tower Hamlets draft Local Plan to reduce carbon emissions by 60% by 2025 in line with the London Plan, to significantly improve current poor air quality, to enhance biodiversity within the borough and to support open spaces and green infrastructure. These are important policies for the health and wellbeing of Tower Hamlets residents, and for supporting the natural environment and ecosystem services (such as clean air and water) on which residents rely. The draft Local Plan also rightly highlights the significant benefits that the natural environment can have on the mental wellbeing of residents, which may in turn have positive knock-on effects on the demand for healthcare and other services. The opportunities to deliver these priorities will be greatly increased if they are considered together at the earliest stage of a development. The Council should support staff and developers to understand and promote positive action in these areas.

However, we believe that the current draft Local Plan, taken as a whole, will not be sufficient to meet the 60% reduction in carbon emissions by 2025, as required by the London Plan. In particular, more robust policies are needed to address carbon emissions from existing building stock within the borough. We have proposed a number of changes to the existing Local Plan policies, including sustainability requirements for non-residential developments under 500m2 and a requirement for 10% on-site renewable energy generation (which does not adversely affect air quality) for all new developments. We note that large floorplate offices of successful businesses are making a significant contribution to high carbon emissions in the borough, and that the impacts of climate change, for example higher summer temperatures, tend to have the greatest negative effect on the most vulnerable. It is therefore imperative that businesses operating in the borough, particularly those creating significant impacts, are required to design out these impacts.

Equally, although we welcome the measures designed to improve air quality in the draft Local Plan, but believe that they should be even more ambitious. In particular, the Plan should do everything possible to address the impacts of traffic, which is the major source of air pollution in the borough. This

should include greater incentives for sustainable transport modes in new and refurbished developments, and significant efforts to reduce the most polluting vehicles – including diesel vehicles – in the borough.

Finally, we note the concern of residents around increasing levels of development in the borough. The effects of such development are a real and present concern, since they impact on a healthy and safe environment, the mitigation of and adaptation to climate change and the wellbeing of residents. All efforts should be made through the Local Plan to enhance the natural environment, rather than simply managing a continued degradation.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:13
Consultation Point	Strategic Policy SG 1 (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Point 1: the list of criteria (i – iv) under section d should also include: ‘the natural environment, including levels of greenhouse gas emissions, levels of air pollution and preservation of biodiversity.’

Point 3: The phrase ‘the following BREEAM standards (or any future replacement standards) will be met...’ should be replaced with ‘all relevant sustainability requirements will be met, including the following BREEAM standards (or any future replacement standards)...’. In the BREEAM standards listed in 3. a. and b. we welcome the requirement to meet at least BREEAM ‘Excellent’ rating. In addition, we propose that that point 3 should be expanded to include:

- 1 the sustainability improvements that will be required of non-residential refurbishments of under 500m²;
- 2 assessment of all non-residential refurbishments of over 500m² using the BREEAM In-Use standard, aiming for ‘Very Good’; and
- 3 a requirement for seasonal commissioning of major developments.

Given that, as the draft Local Plan notes, ‘Tower Hamlets... produces the third highest level of total carbon dioxide emissions of all the boroughs in London’, and that this is largely caused by ‘the high energy uses and inefficiency of large floorplate office buildings’, significant sustainability improvements must be required of all non-residential spaces.

Point 4 identifies what constitutes ‘good standards of sustainable construction’, but only in relation to materials. This point should be expanded to include all aspects of sustainability, including embodied carbon, waste, biodiversity and water, to account for the wide variety of sustainability impacts arising from new development. We also query whether this point will be supported with supplementary planning guidance, which could provide specific targets for all requirements to ensure that they are enforceable.

Point 7, on those developments required to submit a Health Impact Assessment as part of their planning application, should include as a new point c. infrastructure developments, for example changes to roads within Tower Hamlets’ jurisdiction.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
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Comment ID	NLPPA
Response Date	02/01/17 18:14
Consultation Point	4.2.2.8 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

(4.2.2.8) Policy Implementation for SG1 should include a requirement for monitoring and verification of the environmental performance of new developments, to ensure that developments meet the standards set out in the Local Plan. The LPA should include a requirement for proposals to be accompanied by a strategy for monitoring and reporting of in-use carbon emissions and this should be backed up by a process for routine collection of data by the LPA over a period of not less than five years.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:14
Consultation Point	Strategic Policy SG 2 (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Point 1: Developments should achieve a minimum score under the Considerate Constructors Scheme, in order to incentivise good practice throughout the development period.

Point 2: This point should be strengthened. Given that the entire borough is an Air Quality Management Area, the use of Construction and/or Freight Consolidation Centres should be obligatory, except where it can be proven infeasible.

Overall, this policy would be strengthened if developers were required to demonstrate how they have considered its requirements in a Construction Management Plan (as is referenced in relation to ES2 Air Quality, and DH7 Amenity).

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:15

Consultation Point	Policy DH 9 (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

We strongly support the use of living roofs on new developments, where possible, for their proven ability to reduce overheating as well as to support biodiversity.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:15
Consultation Point	Strategic Policy H 1 Delivering Housing (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Point 4: we believe the Home Quality Mark standards should be obligatory, rather than optional. This will substantially raise the standards of housing in the borough, benefitting residents.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:16
Consultation Point	Strategic Policy ES 1 Protect and Enhance Our Environment (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Yes

If you agree, please tell us why?

We strongly support this policy, which is vital to maintaining the long-term health and wellbeing of the borough, and the other species with whom we share it. We would encourage the Council to consider how training and advice on these issues can be actively promoted within the Council, to ensure that a proactive approach is taken to maximising these public benefits wherever possible.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:16
Consultation Point	Policy ES 2 Improving Air Quality (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Yes

If you agree, please tell us why?

We strongly welcome this policy, which has the ability to tackle one of the worst environmental issues in Tower Hamlets.

We note that since an Air Quality Impact Assessment will be required for areas of 'sub-standard' air quality, they will therefore be required for most of the borough. The Council should support developments that undertake this Assessment to actively seek to improve air quality through the construction and operation of the development. The extent to which new developments encourage users to prioritise sustainable modes of transport should also be a consideration.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:18
Consultation Point	4.9.3.3 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

(4.9.3.3) In setting out policy implementation in relation to 'low or zero emission transport', the Local Plan should specify that diesel vehicles are not considered 'low emission'.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
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Comment ID	NLPPA
Response Date	02/01/17 18:20
Consultation Point	Policy ES 3 Urban Greening and Biodiversity (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

We welcome this policy, which supports the vibrant biodiversity in the borough. The scoping Sustainability Appraisal notes that large areas of the borough have deficient access to nature and biodiversity: everything possible should be done to remedy this situation through the Local Plan.

However, the wording of section 5 of the policy does not properly reflect the mitigation hierarchy, and should be re-worded as follows:

- 1 To avoid adverse impact to the biodiversity interest;
- 2 Where avoidance is not possible, to minimise impact and seek mitigation of impact to the biodiversity interest;
- 3 As a last resort for exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, to seek appropriate compensation;
- 4 Where appropriate compensation is not possible, planning permission will be refused.

This is in line with paragraph 118 of the National Planning Policy Framework, which states: 'if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.'

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:20
Consultation Point	4.9.4.2 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

In Policy Implementation, green and blue areas should be considered for their biodiversity value as well as their contribution to green infrastructure in the borough.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:21
Consultation Point	4.9.5.8 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

(4.9.5.8) This paragraph should be amended to include explicit reference to reducing the amount of hard surfacing being added to gardens wherever possible, in order to reduce run-off and retain biodiversity features. The paragraph should also make explicit cross-reference to Policy OS3, and the need to consider opportunity to retain, enhance or create green infrastructure, of which management of flood risk is one aspect.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:21
Consultation Point	Policy ES 6 Achieving a Zero Carbon Borough (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Given that, as the draft Local Plan notes, 'Tower Hamlets... produces the third highest level of total carbon dioxide emissions of all the boroughs in London', and that this is largely caused by 'the high energy uses and inefficiency of large floorplate office buildings', this policy should require high standards in terms of energy efficiency. In particular, we recommend that all new non-residential buildings are required to have occupancy-based automatic control of lighting, heating, ventilation and air conditioning.

Point 2: this should be required of major residential and non-residential developments, *and* minor non-residential developments. In addition:

- 1 Energy efficient design and building fabric should include reference to energy efficiency in plants and control;
- 2 All developments should be required to connect to local decentralised energy networks unless it can be demonstrated that it is not feasible; and
- 3 All new developments should provide a minimum of 10% on-site renewable energy generation, which would both reduce carbon dioxide emissions and support electricity grid infrastructure.

Such renewables should not have a negative impact on air quality, as may be the case with some biofuels. This point should change 'where feasible', to 'unless this is not technically possible'.

We believe the LPA should look favourably on developments that encourage a mix of renewable energy ownership models such as community energy, which can have a range of benefits beside carbon reduction including community cohesion.

Point 3: We strongly support this provision given that most housing stock will currently be in use for at least the next 50 years.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:22
Consultation Point	Policy ES 7 Waste Management (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Point 1: the criteria for development that supports waste management should include waste management solutions that do not promote the use of incineration and/ or energy from waste, or any waste management solution that has a negative impact on air quality in the borough.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:22
Consultation Point	Strategic Policy TR 1 Sustainable Travel (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

Point 1: sub-point b. should be amended as follows: 'developments to demonstrate they are properly integrated with the public transport network *and cycling and walking routes* to maximise the offer of sustainable transport modes across the borough.'

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:23
Consultation Point	4.10.3.4 Paragraph (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

(4.10.3.4) The package of measures recommended for inclusion in the Travel Plan for a development should be amended as follows: '... encourage use of sustainable transport, including through provision of incentives for non-diesel and newer cars, and reduce the need...'. Such incentives could include provision of car parking spaces based on type of vehicle (e.g. electric, petrol or diesel).

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:24
Consultation Point	Policy TR 3 Parking and Permit-free (View)
Status	Draft
Submission Type	Web
Version	0.1
Do you agree with this content?	Other

Please make any other comments here:

This policy should be amended such that all developments include at least one car club space, with more in larger developments, in proportion to the size of the development.

Comment by	Friends of the Earth Hackney and Tower Hamlets (Ms Kate Hand)
Comment ID	NLPPA
Response Date	02/01/17 18:25
Consultation Point	4.11.2.5 Paragraph (View)
Status	Draft
Submission Type	Web

Version 0.1

Do you agree with this content? Other

Please make any other comments here:

We would support Section 106 agreements being actively used by the Council to support local cycling infrastructure, and believe that this should be reflected in this section on Policy Implementation.