

DEVELOPMENT COMMITTEE

Thursday, 4 June 2020 at 6.30 p.m.
Online 'Virtual' Meeting - <https://towerhamlets.public-i.tv/core/portal/home>

This meeting is open to the public to view online

Members:

Chair: Councillor Abdul Mukit MBE

Vice Chair : Councillor Dan Tomlinson

1 Vacancy, Councillor John Pierce, Councillor Mufeedah Bustin, Councillor Dipa Das and Councillor Leema Qureshi

Substitutes:

Councillor Sabina Akhtar, Councillor Kevin Brady and Councillor Rajib Ahmed

[The quorum for this body is 3 Members]

Public Information.

The deadline for registering to speak is **4pm Tuesday, 2 June 2020**

Please contact the Officer below to register. The speaking procedures are attached

The deadline for submitting material for the update report is **Noon Wednesday, 3 June 2020**

Contact for further enquiries:

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Web: <http://www.towerhamlets.gov.uk/committee>

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APOLOGIES FOR ABSENCE

1. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS (Pages 5 - 6)

Members are reminded to consider the categories of interest in the Code of Conduct for Members to determine whether they have an interest in any agenda item and any action they should take. For further details, please see the attached note from the Monitoring Officer.

Members are reminded to declare the nature of the interest and the agenda item it relates to. Please note that ultimately it's the Members' responsibility to declare any interests form and to update their register of interest form as required by the Code.

If in doubt as to the nature of your interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services

2. MINUTES OF THE PREVIOUS MEETING(S) (Pages 7 - 20)

To confirm as a correct record the minutes of the meeting of the Development Committee held on 12th March 2020.

3. RECOMMENDATIONS AND PROCEDURE FOR HEARING OBJECTIONS AND MEETING GUIDANCE (Pages 21 - 24)

To RESOLVE that:

- 1) in the event of changes being made to recommendations by the Committee, the task of formalising the wording of those changes is delegated to the Corporate Director Place along the broad lines indicated at the meeting; and
- 2) in the event of any changes being needed to the wording of the Committee's decision (such as to delete, vary or add conditions/informatives/planning obligations or reasons for approval/refusal) prior to the decision being issued, the Corporate Director Place is delegated authority to do so, provided always that the Corporate Director does not exceed the substantive nature of the Committee's decision.
- 3) To note the procedure for hearing objections at meetings of the Development Committee and meeting guidance.

PAGE NUMBER	WARD(S) AFFECTED
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4. DEFERRED ITEMS

There are none.

5.	PLANNING APPLICATIONS FOR DECISION	25 - 30	
5 .1	Lamb Court, 69 Narrow Street, London E14 PA/19/02579	31 - 48	Limehouse
	Proposal		
	The erection of a 4 storey building comprising one studio unit and two, 2 bedroomed self-contained flats, with a reception and concierge area on the ground floor.		
	Recommendation		
	Grant planning permission subject to conditions		
5 .2	Bow Exchange, 5 Yeo Street, London E3 3Q (PA/19/02281)	49 - 90	Bromley South
	Proposal		
	Demolition of the existing building and redevelopment of the site comprising the erection of 4 to 9 storey building to provide 2,471sqm of flexible B1c workspace at ground and mezzanine level and 92 residential units (Use Class C3) on the upper floors, together with landscaped public open space, communal amenity space, on-site child play space, waste storage, cycle parking and disabled car parking.		
	Recommendation		
	Approve planning permission subject to conditions and a legal agreement.		

6. OTHER PLANNING MATTERS

There are none

Next Meeting of the Development Committee

Thursday, 9 July 2020 at 6.30 p.m. to be held in the Online 'Virtual' Meeting -
<https://towerhamlets.public-i.tv/core/portal/home>

Agenda Item 1

DECLARATIONS OF INTERESTS AT MEETINGS NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

(i) Disclosable Pecuniary Interests (DPI)

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

DPI Dispensations and Sensitive Interests. In certain circumstances, Members may make a request to the Monitoring Officer for a DPI dispensation or for an interest to be treated as sensitive interest.

(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

(iii) Declarations of Interests not included in the Register of Members' Interest.

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

Guidance on Predetermination and Bias

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting

In such circumstances the member may not vote on any reports and motions with respect to the matter.

APPENDIX A: Definition of a Disclosable Pecuniary Interest

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either— (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE DEVELOPMENT COMMITTEE

HELD AT 7.00 P.M. ON THURSDAY, 12 MARCH 2020

COUNCIL CHAMBER, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE
CRESCENT, LONDON, E14 2BG

Members Present:

Councillor Abdul Mukit MBE (Chair)

Councillor John Pierce
Councillor Dipa Das
Councillor Leema Qureshi
Councillor Kevin Brady

Other Councillors Present:

Councillor Tarik Khan

Officers Present:

Paul Buckenham	– (Development Manager, Planning Services, Place)
Sally Fraser	– Team Leader (East)
Gareth Gwynne	– (Area Planning Manager (West), Planning Services, Place)
Kathleen Ly	– Planning Officer
Rachel Mckoy	– (Head of Commercial & Contracts, Legal Services Governance)
Aleksandra Milentijevic	– Planning Officer
Simon Westmorland	– (West Area Team Leader, Planning Services, Place)
Matthew Wong	– Planning Officer
David Knight	– (Senior Democratic Services Officer)

Apologies:

Councillor Mufeedah Bustin
Councillor Dan Tomlinson

1. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

No declarations of disclosable pecuniary interests were received at the meeting.

2. MINUTES OF THE PREVIOUS MEETING(S)

The Committee **RESOLVED**

That the unrestricted minutes of the meeting of the Committee held on be agreed as a correct record and signed by the Chair.

3. RECOMMENDATIONS AND PROCEDURE FOR HEARING OBJECTIONS AND MEETING GUIDANCE

The Committee **RESOLVED** that:

1. The procedure for hearing objections and meeting guidance be noted;
2. In the event of changes being made to recommendations by the Committee, the task of formalising the wording of those changes be delegated to the Corporate Director, Place along the broad lines indicated at the meeting; and
3. In the event of any changes being needed to the wording of the Committee's decision (such as to delete, vary or add conditions/informatives/planning obligations or reasons for approval/refusal) prior to the decision being issued, the Corporate Director, Place be delegated authority to do so, provided always that the Corporate Director does not exceed the substantive nature of the Committee's decision.

4. DEFERRED ITEMS

There were no deferred items.

5. PLANNING APPLICATIONS FOR DECISION**5.1 North and South Passage, Iron Mongers Place, E14**

An update report was tabled.

Paul Buckenham (Development Manager) introduced the application which relates to a north/ south walkway which runs between Westferry Road and Sherwood Gardens in the Isle of Dogs.

Matthew Wong (Planning Services) informed the Committee that (i) the original application PA/13/01547 had granted permission for the installation of gates and barriers within the walkway and this permission was implemented. With condition 4 of the permission had required that these gates should remain unlocked at all times; and (ii) the current proposal now seeks to vary condition 4 of that planning permission, to allow the gates to be locked and pedestrian access along the walkway to be stopped.

Mr Wong stated that the application was being reported to the Development Committee because there have been than 20 individual representations in support of the development.

The Committee noted that its application has been considered against (a) the Council's approved planning policies contained in the London Borough of the Tower Hamlets Local Plan 2031 (January 2020) as well as the London Plan (2016), the National Planning Policy Framework and all other material considerations; (b) the Draft London Plan (2019) as this carries substantial weight.

Mr Wong stated that:

- The proposal is considered to be unacceptable as it would (1) result in the loss of a safe, convenient and traffic free access way, and disadvantage those less able pedestrians, (2) provoke less sustainable transport choices; and (3) lead to the creation of underused spaces which may result in antisocial behaviour and a lack of social cohesion, contrary to policies D.DH2, S.DH1, D.DH8 and S.TR1 of the Tower Hamlets Local Plan (2020);
- In 2013, planning permission was granted for the construction of two gates and two sets of barriers within the walkways (ref PA/13/01547). This permission was duly implemented and two gates were installed, one at the northern end adjacent to Sherwood Gardens and another at the southern end adjacent to Spindrift Avenue. The gates are approximately 1750mm -1800mm high and comprise of brick piers at either end with fixed, metal infill panels containing vertical posts. Condition 4 of the consent required that the gates always remain unlocked.
- Two sets of physical barriers had also been constructed within the walkways, in locations immediately to the north and south of Ironmongers Place. The barriers did not close off access to the passages, rather they act as physical obstacles to ensure cyclists and those on vehicles must dismount before traversing through.
- The walkway is protected through a Section 106 Agreement which was entered into on 15/10/1986 between the owner of the site, the Council and the London Docklands Development Corporation (LDDC). The agreement provided specific reference to the passage and its formal adoption as a walkway, under Section 35 of the Highways Act 1980. Clause 4 of the agreement states that the Walkway (passage) must always remain open to the public unless with the written agreement with the Council. The Agreement also stated that the walkway must remain accessible by all and shall permit easy passage by wheelchairs; and
- A complaint had been received in 2018 that the gates to either end of the walkway had been locked. A Compliance Officer had attended the site and observed that Condition 4 of PA/17/01547 had been breached. Accordingly, a breach of condition notice had been served on 17 May 2019 and was on hold awaiting the outcome of this application.

Therefore, the officers considered that the proposal is recommend for refusal.

The Chair invited the registered speakers to address the Committee.

A resident of Ironmongers Place informed the Committee that he was addressing the meeting in support of the application to permanently lock the gates and access to the passageway. The resident concerns maybe summarised as follows:

- There are issues with criminal activity and anti-social behaviour within the passageway.
- The locking of the gates would help provide a secure and safe environment; and
- The locking of the gates would assist in reducing amenity concerns relating to litter and noise.

Rachael Dickson from the JTS Partnership addressed the meeting as the Applicants Representative and the following is a summary of the points raised:

- The walkways have become the focus for anti - social behaviour (ASB) and that residents are being subjected to undue noise and disturbance due to people 'loitering' within the walkways.
- Residents had also raised concerns regard the level of ASB in the area. The applicant therefore considered that locking of the gates would reduce occurrences of such ASB and associated crime within and around the passageway; and
- Applicant had submitted a 'Crime Statistics' Report which has indicated levels of crime in and around the site from the period of October 2016 to October 2019

However, the Committee was informed that:

- The data that had been included shows that there had also been changes in the overall level of crime in the area over three time periods – (i) from before the gates were locked between October '16 and January '18, (ii) while the gates were (unlawfully) locked between Feb '18 and May '19 and (iii) after June '19, when the gates were unlocked.
- The report concludes that level of ASB and crime had been greater before the gates had been unlawfully locked. It is also was noted that the results appeared to show no real increase in crime since Enforcement Action was taken and the gates were once again unlocked.

In response to the above the Committee indicated that:

- Given the similarities in the overall crime rate reduction across the whole Island Gardens Precinct and that of the Ironmongers Development, the reduction in crime in and around the subject development during 2018 and May 2019 cannot be directly attributed to the locking of the gates.
- The proposal would result in the loss of a safe, convenient and traffic free access way, which would disadvantage those less able pedestrians, would provoke less sustainable transport choices.

- Reduced natural surveillance may allow the passage to become a more attractive location for drug dealing, robbery, fly tipping and Anti-Social Behaviour.
- The wider Island Gardens area experienced a general reduction in crime during the same dates, suggesting there were alternative causes. It therefore cannot be accurately ascertained that the proposed locking of the gates would cause a reduction in anti-social behaviour.
- The passage being out of sight of residents or being more difficult to access by police patrols would make it easier to store or discard stolen mopeds/cycles and aid burglary of surrounding properties.
- The locking the gates may in fact lead to an increase in antisocial behaviour within the walkways, given that they would still be accessible from Ironmongers Place but not used regularly and properly as pedestrian thoroughfares.
- If the gates were locked, the design and location of the existing gating would allow the gates to be easily climbed and would not deter illegitimate users of the site. and
- Any attempt to reduce anti-social behaviour should be consistent with planning policies which encourage activated areas, natural and passive surveillance. These methods would assist in reducing anti-social behaviour whilst also ensuring socially connected communities.

On a vote of 4 in favour the Committee **RESOLVED**:

That the proposed variation of Condition 4 from Planning Permission PA/13/01547 is refused for the following reason:

The proposal is considered to be unacceptable as it would result in the loss of a safe, convenient and traffic free access way, which would disadvantage those less able pedestrians, would provoke less sustainable transport choices and would lead to the creation of underused spaces which may result in antisocial behaviour and a lack of social cohesion, contrary to policies D.DH2, S.DH1, D.DH8 and S.TR1 of the Tower Hamlets Local Plan (2020).

For the avoidance of doubt the planning Officer asked committee to confirm that their vote was for refusal. This was agreed.

5.2 Brune House, Bell Lane & Carter House, Brune Street & Bernard House, Toynbee Street, London E1

An update report was tabled.

Paul Buckingham (Development Manager) introduced the application that sort approval for the replacement of the existing 1200mm railings and addition of gates to a height of 1800mm along the northern and eastern boundaries of the Holland Estate.

Kathleen Ly (Planning Services) presented this application which was being reported to the Development Committee as more than 20 individual representations supporting the development have been received.

Ms Ly advised the Committee that (i) this application has been assessed against planning policies contained in the London Borough of the Tower Hamlets Local Plan 2031 (January 2020), the London Plan (2016), and the National Planning Policy Framework; and (ii). The application has also been considered against the Draft London Plan (2019) as this carries substantial weight.

The Committee was informed by Mr Simon Westmorland (West Area Team Leader - Development Management) that (a) the proposal would result in an incongruous form of development that will neither preserve nor enhance the local streetscape nor maintain the positive character and appearance of the conservation areas; (b) the increase in height to the railings and addition of vehicle and pedestrian gates will result in a gated community, unnecessarily segregating the estate from the public realm; (c) this proposal would negatively affect the social integration of the area and be contrary to the promotion of mixed and balanced communities.

Therefore, the officers considered that the proposal is not considered to be acceptable in policy terms and is not supported.

The Chair invited the registered speakers to address the Committee.

Kabir Ahmed the Chair of the Holland Estate Management Board addressed the meeting the main points that he raised maybe summarised as follows:

1. At the time of the Stock Transfer from LBTH to Eastend Homes (EEH) in 2006, the bid made to residents to win support for this process was based mainly on a programme of improvement works to the buildings and the estate i.e. '*security and safety*'; and '*boundary treatment with gated access*'. This included lifts and perimeter security enhancements (as in the current application) to offer better safety on the estate as well as the key promise of lifts to the blocks in the application area';
2. During the housing stock transfer these promises were supported by the Council and all the consultation documents included these as key aspects of work that will be undertaken once transfer was completed;
3. Additionally, these enhancements were granted planning permission as part of the broader applications (PA/08/02347 refers), of estate improvements that EEH made after they took possession of the estate;
4. At the time the Council encouraged residents to consider transfer to housing associations with the promise of being able to make improvements to the estate. Key promises that led to residents voting for transfer were improved security measures and lifts;
5. If permission is not granted, it would bring into question that whole process and whether those promises made were worth the paper it was written on. It would be a betrayal of the trust that residents put into the whole stock transfer process and on the information supplied to residents by both the Council and EastendHomes;
6. With this historical context, and promises made to residents at the time of stock transfer, we believe that the application deserves exception and should be considered for approval by the Development Committee.

7. Since the stock transfer in 2006, the night time economy has increased drastically in the area, which has seen an increase in ASB. Residents are plagued with non-residents using the estate as a urinal, taking drugs, dealing drugs, noise issues related alcohol, groups congregating and causing general nuisance and intimidation, amongst many other issues. Therefore, the experiences and difficulties faced by residents who live in the area should be taken into account and this application be approved in order to improve the quality of life and wellbeing for these residents.

Councillor Tarik Khan addressed the main points that he raised are summarised as follows:

Councillor Khan indicated that the:

- a. use of historically appropriate style of fencing, at a height that is applicable to the streetscape, would provide the strong boundary that has always been there, but with a more open and permeable feel;
- b. proposed design would in effect enhance the character and appearance of the conservation area through the railings being of a conservation type style and therefore should be welcomed and approved;
- c. Proposals would not have a significant adverse effect on the accessibility and permeability of the local area. The courtyard areas leading into the estate are not public thoroughfares and visually as you enter the state, you get an impression that there is no through route except leading into the individual buildings. There are signs indicating the estate is for private resident access only; and
- d. proposed improvements will deal with the issues associated with ASB, and allow residents to use these communal spaces again, with clear benefits to social inclusion and wellbeing within the estate, and in terms of interaction between residents within the estate on Brune Street and outside, because the fencing allows much more visual permeability than the wall that was there before. These are very real issues that the proposed perimeter will actually improve, with negligible negative results.

However, the Committee was informed that:

- The improvement of entrances to reduce anti-social behaviour, to exclude intruders and enhance the appearance of the blocks as presented at the Stock Transfer Stage would be subject to further resident consultation, planning approval and the development of new homes for rent and sale. As such, the submitted information does not warrant or justify the approval of the proposal as any planning proposal is subject to a formal assessment and is considered on its planning merits.
- The proposal is not supported given the increase in height, reduction in the width between the rails and prominent location of the fence fronting the street;
- The proposal would result in an incongruous form of development which would negatively impact the local street network and would not be

socially inclusive, cohesive or connective. Additionally, the design of the gates is more of a modern approach and is not considered to be in keeping with the estate;

- Development should be sympathetic in form, scale, materials and architectural detail to the heritage asset and/or setting. The existing views along Brune Street are currently open and transparent as the existing 1200mm railings is not considered to be a dominant feature and is not imposing to the streetscape;
- The proposed pedestrian access gates would restrict movement within the estate and surrounding area. This is contrary to policy which encourages development to increase and maintain well-connected areas. Enclosing all access points will limit the number of connections available when moving from one point to the other, and thus impacting upon the pedestrian connectivity to the wider street network;
- The applicant and received public comments identify the site as a private estate where public access is restricted. However the erection of the 1800mm high railing and gates would create a hostile and enclosed environment, unnecessarily segregating the estate from the public realm. This would result in the estate becoming a 'gated community' where accessing the site would only be possible via a key code or intercom. However, the London Plan and the Local Plan sought to resist the creation of gated communities which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places. The enclosing of the estate would negatively affect the social integration of the area and be contrary to allowing mixed and balanced communities;
- The National Planning Policy Framework and the London Plan sought to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion;
- The London Plan also aims to achieve the highest standards of accessible and inclusive design and ensures development can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances. Development should be convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;
- Reduced natural surveillance may allow the passage to become a more attractive location for drug dealing, robbery, fly tipping and Anti-Social Behaviour;
- The purpose intended for the gates and railings although intended to improve the quality of life for residents in terms of safety and security, is contrary to Council's policies which encourage socially connected communities. Therefore, alternative methods to alleviate anti-social behaviour should be considered which could include activating areas to provide natural and passive surveillance; and
- The proposal would restrict movement and access, does not incorporate the principles of inclusive design and is not sensitive to nor enhance the local streetscape and conservation areas.

On a vote of 2 in favour 2 against, with the Chair exercising his **casting** vote in favour, the Committee **RESOLVED**:

That the proposal is refused for the following reason:

- That it would result in an incongruous form of development that will neither preserve nor enhance the local streetscape nor maintain the positive character and appearance of the conservation areas. The increase in height to the railings and addition of vehicle and pedestrian gates will result in a gated community, unnecessarily segregating the estate from the public realm. This would negatively affect the social integration of the area and be contrary to the promotion of mixed and balanced communities. Accordingly, the proposal is not considered to be acceptable in policy terms and was refused.

For the avoidance of doubt the Planning Officer asked committee to confirm that their vote was for refusal. This was agreed.

5.3 De Paul House, 628-634 Commercial Road, London, E14 7HS

An update report was tabled.

Paul Buckenham (Development Manager) informed the Committee that the proposed development sort to replace an existing 52-bedroom hostel with a 109-bedroom mix of hostel and housing in multiple occupation (HMO). Out of the total number of the proposed rooms, 25 would be associated with the hostel use situated on the lower ground and ground floor levels. Additionally, 84 rooms it was noted are proposed to be provided for a long-term residential accommodation in the form of housing with shared facilities. This would consist of residents having exclusive use of their ensuite bedrooms whilst sharing communal facilities that include living, kitchen, dining and amenity spaces. In addition, some of the bedrooms on the fifth and sixth floors would have private balconies.

Ms Aleksandra Milentijevic advised the Committee that the existing hostel has the capacity to accommodate 263 occupants in a number of 2 and 3 bedrooms and multi-bed dormitories. Whilst the applicant is proposing a total number of 185 occupants in the currently proposed scheme to be apportioned as follows: 41 in hostel rooms and 144 in the shared living accommodation. It was noted that officers have identified a number of issues associated with the proposed land use. Which included (i) the lack of justification for the need of the HMO use; (ii) its unaffordability; and lack of effective management arrangements. In addition, the proposal fails to provide appropriate affordable housing contributions as required by planning policy.

Notwithstanding that the proposed HMO use is not supported in principle, Ms Milentijevic stated that the:

- Quality of the proposed HMO accommodation is not considered to be acceptable given the proposal's failure to provide sufficient communal amenity space for the future residents and adequately lit communal indoor amenity spaces.

- Existing building is predominantly three storeys along Commercial Road with a staircase enclosure on the north-eastern corner which reaches four storeys. At the rear, the building steps down to two and one storey with a concrete boundary wall. The existing building has limited value in terms of its external appearance and its replacement with an appropriately designed building is acceptable in principle.
- Proposed building would be seven storeys in height with the two top floors set back on all sides. The scale, height and massing of the proposed development are considered to be excessive and the top floors would be characterised by a poor fenestration pattern. As such, the proposed building would have a harmful impact on the character and appearance of the St Anne's Church conservation area, in which the application site also lies. Further, the applicant has not submitted an archaeology assessment as required by planning policy.
- Proposal would further fail to provide an adequate amount of cycle parking linked to the HMO use. In addition, the proposed cycle storage would comprise of a shared space within a general storage area which lacks a clear and obvious purpose. This is considered unacceptable in principle due to the safety concerns and likely obstructions.
- Although on-street servicing has been previously agreed and as such is considered acceptable in principle, the proposal has not provided an adequate delivery and servicing strategy that would ensure that adverse impact on the transport network would be mitigated. The applicant has also not provided enough information to satisfy the policy requirement that the proposed development would incorporate enough waste storage capacity to cater for the future occupiers, there are also concerns about the placement of the disabled car parking space. The refuse would be collected via an on-street platform lift, however, the proposal failed to provide adequate details to ensure that the waste management and collection can be successfully achieved; and
- Application site is in an area of a particularly low air quality. The applicant has failed to submit an air quality assessment to demonstrate that the proposal would achieve the air quality neutral standard and has also not submitted enough information to satisfy the relevant requirements contained in the energy and sustainable policies.

Therefore, it is considered that the proposed development does not constitute sustainable development as required by the NPPF. It would fail to comply with the relevant policies in terms of land use, quality of the proposed accommodation, design and heritage, highways, waste, and environmental matters. Accordingly, the proposal would fail to secure the relevant financial and non-financial contributions. Therefore, the officers recommend the proposed development be refused planning permission.

The Chair invited the registered speakers to address the Committee.

Fidelma Boyd Chair of the Parish Council of the RC Church addressed the meeting the main points that she raised maybe summarised as follows:

- The new proposals, albeit amended in terms of upper elevation and re-location of the entrance, still does not represent an appropriate development in the conservation area.
- This application would not adhere to the Council policy 'to achieve high-quality design and protection of amenity within the borough' and in particular the following points within the policy: 'provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles' and 'ensure appropriate provision of outdoor amenity space, whether public, private or communal which accords with appropriate minimum standards and is compatible with the character of surrounding areas'.
- The current building on the site raises some serious safeguarding concerns, both for the school/college students who frequently stay there and those long-term residents who are clearly in need of support. It is hard to envisage that the proposed substantial enlargement of the building would not be accompanied by an increase in safeguarding concerns.

Councillor James King; Tom Walker (Local Resident); and Lucinda Longwill (Local Resident) then addressed the meeting the main points are outlined below:

- The cumulative effect of other construction works in the area.
- Lack of affordable housing provision.
- Impact on social cohesion from the increased transient population.
- Concerns over the continued provision for the most vulnerable people.
- No clear management for the proposed development.
- Harm to the character and appearance of the St Anne's Church conservation area, Lowell Street conservation area, and Our Lady Immaculate Church.
- Impact on the amenity of the surrounding residential properties, loss of daylight and sunlight, loss of privacy, outlook and view; dust, pollution and traffic impacts during the construction stage.
- Impact on the capacity and safety of the surrounding transport network including the DLR, on-streetcar parking, pick-ups/drop offs, servicing and deliveries.
- Environmental impact including the creation of a wind tunnel, increase in noise and air pollution.

Duncan Parr, Planning Partner, Rapleys LLP addressed the meeting as the Applicants Representative his comments are summarised below:

The development would:

- Provide accommodation for tourists on a moderate budget;

- Offer short-term co-living spaces for people on shorter contracts and medium-term tourists not being able to rent a flat in the area;
- Have good accessibility to transport;
- See a decrease in the number of occupants due to the increase in height; and
- Have a positive impact on the street scene with the provision of a ground floor café.

On a vote of 4 in favour the Committee **RESOLVED**:

That subject to any direction by the Mayor of London, planning permission is **REFUSED** for the following reasons:

- 1) The proposed development fails to demonstrate the need for the proposed large-scale HMO use on the site. In addition, the proposal fails to provide affordable housing contributions. As a result, the proposal is contrary to Local Plan policies D.H2, D.H7 of the Tower Hamlets Local Plan 2031 (2020).
- 2) The scale, height and massing of the proposed seven storey building would be overbearing to the local character of the area and as such would cause harm to the St Anne's Conservation Area. The site layout and scale of the proposed development fails to follow good design principles indicating the over-development of the site. The proposal fails to secure high quality design detailing. Also, the applicant has not submitted an archaeological assessment as required. As such, the proposal would be contrary to Chapters 12 and 16 of the National Planning Policy Framework (2019), London Plan (2016) policy 7.4 and 7.8 and Local Plan policies S.DH1, D.DH2 and S.DH3 of the Tower Hamlets Local Plan 2031 (2020) and the St Anne's Church Conservation Area Character Appraisal and Management Guidelines (2009).
- 3) The proposed HMO accommodation would not provide adequately lit communal indoor amenity spaces. There would also be a lack of communal amenity space for future occupiers of the proposed HMO accommodation. As such, the quality of the proposed shared living accommodation is not considered to be acceptable and in accordance with Chapter 12 of the National Planning Policy Framework (2019), policy 3.5 of the London Plan (2016) and S.H1, D.H2, D.H3, D.H7 and D.DH8 of the Tower Hamlets Local Plan 2031 (2020).
- 4) The proposal fails to ensure that the operational needs of the proposed development would not adversely impact the safety and capacity of the transport network. Insufficient information has been provided to ensure that the proposed wheelchair car parking space would not impact the safety of the transport network along Island Row. In addition, insufficient Trip Generation data has been provided and an adequate Servicing and Delivery Plan has not been provided. This is contrary to Chapter 9 of the National Planning Policy Framework (2019), London Plan (2016) policies 6.3, 6.9, 6.12 and 6.13 of the London Plan (2016) and Local Plan policies S.TR1, D.TR2, D.TR3 and D.TR4 of the Tower Hamlets Local Plan 2031 (2020).
- 5) The proposal has not provided a sufficient amount of cycle storage, and the storage that is provided would not meet policy requirements due to

its location and accessibility, which contradicts Chapter 9 of the National Planning Policy Framework (2019), London Plan (2016) policies 6.9 and 6.13 and Local Plan policy D.TR3 of the Tower Hamlets Local Plan 2031 (2020). The proposal also fails to demonstrate that enough waste storage capacity, management and collection would be provided to satisfy the requirements of policy D.MW3 of the Tower Hamlets Local Plan 2031 (2020).

- 6) In the absence of sufficient information, including an air quality assessment and energy assessment based on the GLA's Energy Assessment guidance and recommendations for the use of SAP10 carbon factors, the proposed development would not be in accordance with Chapters 14 and 15 of the National Planning Policy Framework (2019), London Plan (2016) policies 5.2 and 7.14, and Local Plan policies D.ES1 and D.ES7 of the Tower Hamlets Local Plan 2031 (2020).
- 7) In the absence of the s106 agreement to provide the relevant financial and non-financial contributions to mitigate the impacts of the development, the proposal fails to comply with policy D.SG5 of the Tower Hamlets Local Plan 2031 (2020).

6. OTHER PLANNING MATTERS

Nil items

The meeting ended at 9.17 p.m.

**Chair, Councillor Abdul Mukit MBE
Development Committee**

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DEVELOPMENT COMMITTEE

Report of the Corporate Director of Place

Classification: Unrestricted

Guidance for Development Committee/Strategic Development Committee Meetings.

Who can speak at Committee meetings?

Members of the public and Councillors may request to speak on applications for decision (Part 5 of the agenda). All requests must be sent direct to the Committee Officer shown on the front of the agenda by the deadline – 4pm one clear working day before the meeting. Requests should be sent in writing (e-mail) or by telephone detailing the name and contact details of the speaker and whether they wish to speak in support or against. Requests cannot be accepted before agenda publication. Speaking is not normally allowed on deferred items or applications which are not for decision by the Committee.

The following may register to speak per application in accordance with the above rules:

Up to two objectors on a first come first served basis.	For up to three minutes each.
Committee/Non Committee Members.	For up to three minutes each - in support or against.
Applicant/ supporters. This includes: an agent or spokesperson. Members of the public in support	Shall be entitled to an equal time to that given to any objector/s. For example: <ul style="list-style-type: none">• Three minutes for one objector speaking.• Six minutes for two objectors speaking.• Additional three minutes for any Committee and non Committee Councillor speaking in objection. It shall be at the discretion of the applicant to allocate these supporting time slots.

What if no objectors register to speak against an applicant for decision?

The applicant or their supporter(s) will not be expected to address the Committee should no objectors register to speak and where Officers are recommending approval. However, where Officers are recommending refusal of the application and there are no objectors or members registered, the applicant or their supporter(s) may address the Committee for 3 minutes.

The Chair may vary the speaking rules and the order of speaking in the interest of natural justice or in exceptional circumstances.

Committee Members may ask points of clarification of speakers following their speech. Apart from this, speakers will not normally participate any further. Speakers are asked to arrive at the start of the meeting in case the order of business is changed by the Chair. If speakers are not present by the time their application is heard, the Committee may consider the item in their absence.

This guidance is a précis of the full speaking rules that can be found on the Committee and Member Services webpage: www.towerhamlets.gov.uk/committee under [Council Constitution, Part C Section 35](#) Planning Code of Conduct

What can be circulated?

Should you wish to submit a representation or petition, please contact the planning officer whose name appears on the front of the report in respect of the agenda item. Any representations or petitions should be submitted no later than noon the working day before the committee meeting for summary in the update report that is tabled at the committee meeting. No written material (including photos) may be circulated at the Committee meeting itself by members of the public including public speakers.

How will the applications be considered?

The Committee will normally consider the items in agenda order subject to the Chair's discretion. The procedure for considering applications for decision shall be as follows:
Note: there is normally no further public speaking on deferred items or other planning matters



- (1) Officers will introduce the item with a brief description.
- (2) Officers will present the report supported by a presentation.
- (3) Any objections that have registered to speak to address the Committee
- (4) The applicant and or any supporters that have registered to speak to address the Committee
- (5) Committee and non- Committee Member(s) that have registered to speak to address the Committee
- (6) The Committee may ask points of clarification of each speaker.
- (7) The Committee will consider the item (questions and debate).
- (8) The Committee will reach a decision.

Should the Committee be minded to make a decision contrary to the Officer recommendation and the Development Plan, the item will normally be deferred to a future meeting with a further Officer report detailing the implications for consideration.

How can I find out about a decision?

You can contact Democratic Services the day after the meeting to find out the decisions. The decisions will also be available on the Council's website shortly after the meeting.

For queries on reports please contact the Officer named on the front of the report.

Deadlines. To view the schedule of deadlines for meetings (including those for agenda papers and speaking at meetings) visit the agenda management timetable, part of the Committees web pages. Visit www.towerhamlets.gov.uk/committee - search for relevant Committee, then 'browse meetings and agendas' then 'agenda management timetable'.	 Scan this code to view the Committee webpages.
The Rules of Procedures for the Committee are as follows: <ul style="list-style-type: none">• Development Committee Procedural Rules – Part C of the Council's Constitution Section 35 Appendix B.• Terms of Reference for the Development Committee - Part B of the Council's Constitution Section 19 (7).	 Council's Constitution

Public Information – ‘Accessing and Participating in Remote’ Meetings

The meeting is due to be held as a ‘remote meeting’ through the Microsoft Teams app in accordance with:

- The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020, allowing for remote Committee Meetings.

The following guidance provides details about the operation of the virtual Strategic and Development Committee Meetings.

Publication of Agenda papers and meeting start time.

Electronic copies of the Committee agenda will be published on the Council’s Website on the relevant Committee pages at least five clear working days before the meeting. In the event of a technical difficulty, the meeting arrangements may need to be altered at short notice (such as a delay in the start time). Where possible any changes will be publicised on the website.

A link to the electronic planning file can be found on the top of the Committee report. Should you require any further information or assistance with accessing the files, you are advised to contact the Planning Case Officer.

How can I watch the Committee meeting?

Except when an exempt item is under discussion, the meeting will be broadcast live for public viewing via our Webcasting portal <https://towerhamlets.public-i.tv/core/portal/home>. Details of the broadcasting arrangements will be published on the agenda front sheet. The meeting will also be available for viewing after the meeting. Physical Attendance at the Town Hall is not possible at this time

How can I register to speak?

Members of the public and Councillors may address the meeting in accordance with the Development Committee Procedure Rules. (Details of the process are set out on the above guidance). Please note however, that it may not usually be possible to arrange for additional speaking rights and late requests to speak, particularly those received during or shortly before a meeting.

Should you wish to address the Committee, please contact the Democratic Services Officer to register to speak by the deadline, who will assist you to join the meeting. It is recommended that you supply the Officer with a copy of your representation in case you lose connection. You may address the Meeting via Teams. You have the option of joining through a video link or audio.

(Please note that if you participate at the meeting, you must be able to hear and be heard by the other participants attending remotely).

Where participation through video or audio tools is not possible, please contact the Democratic Services officer by the deadline to discuss the option of:

- Submitting a written statement to be read out at the meeting.

You may also wish to consider whether you could be represented by a Ward Councillor or another spokesperson.

Microsoft Teams:

This is a Microsoft Teams Event. If you are using a Laptop or PC or a mobile device, you may join via the website. Should you require assistance please contact the relevant Democratic Services Officer who will be able to assist you further.

Procedure at the Committee meeting.

Participants (contributors) in the virtual meeting are expected to log in to the meeting in advance of the start time of the meeting, as set out in the guidance that will be provided by the Democratic Services Officer, when you register to speak. This is in order to check the connection. You will be expected to confirm your identity before the meeting starts.

The Chair will formally open the meeting and will introduce themselves and every participant. The Chair will then set out the expected meeting etiquette, including the following:

- When speaking for the first time, participants should state their full name before making a comment.
- To only speak at the invitation of the Chair.
- The method for indicating how to speak.
- If referring to a specific page of the agenda pack, you should mention the page number.
- All participants microphones must be muted when not speaking.
- Where necessary, participants may switch off their cameras when not speaking to save bandwidth.
- Participants **must alert** the Chair/Democratic Services Officer if they experience technical difficulties, particularly a loss of connection, or if they need to leave the meeting, as soon as possible. Where a key participant experiences a loss of connection, the Chair may adjourn the meeting until such a time the participant can re-join the meeting. A key participant is defined as a participant whose continuing contribution to the meeting is vital to allow a decision to be made.

The Chair, following consultation with Democratic Services and the Legal Advisor, may adjourn the virtual meeting for any reason should they consider that it is not appropriate to proceed.

The format for considering each planning application shall, as far as possible, follow the usual format for Strategic and Development Committee Meetings, as detailed below.

- Officers will introduce the item with a brief description, and mention any update report that has been published.
- Officers will present the application supported by a presentation
- Any objectors that have registered to speak to address the Committee.
- The applicant or any supporters that have registered to speak to address the Committee.
- Committee and Non Committee Members that have registered to speak to address the Committee.
- The Committee may ask points of clarification of each speaker.
- The Committee will consider the item (Questions and Debate)
- Voting. At the end of the item, the Chair will ask the Committee to vote on the item. The Chair will ensure that all Members are clear on the recommendations, have heard all of the presentation and submissions. The Chair will conduct a roll call vote, asking each Committee Member to indicate their vote, (for, against, or abstain) Other voting methods may be used at the Chair's discretion
- The Democratic Services Officer will record the votes and confirm the results to the Chair.



DEVELOPMENT COMMITTEE

Report of the Corporate Director of Place

Classification: Unrestricted

Advice on Planning Applications for Decision

1. INTRODUCTION

- 1.1 In this part of the agenda are reports on planning applications for determination by the Committee. Although the reports are ordered by application number, the Chair may reorder the agenda on the night. If you wish to be present for a particular application you need to be at the meeting from the beginning.
- 1.2 The following information and advice applies to all those reports.

2. FURTHER INFORMATION

- 2.1 Members are informed that all letters of representation and petitions received in relation to the items on this part of the agenda can be made available for inspection at the meeting.
- 2.2 Members are informed that any further letters of representation, petitions or other matters received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

2.3 ADVICE OF CORPORATE DIRECTOR, GOVERNANCE

- 3.1 This is general advice to the Committee which will be supplemented by specific advice at the meeting as appropriate. The Committee is required to determine planning applications in accordance with the Development Plan and other material planning considerations. Virtually all planning decisions involve some kind of balancing exercise and the law sets out how this balancing exercise is to be undertaken. After conducting the balancing exercise, the Committee is able to make a decision within the spectrum allowed by the law. The decision as to whether to grant or refuse planning permission is governed by section 70(2) of the Town and Country Planning Act 1990 (TCPA 1990). This section requires the Committee to have regard to:

- the provisions of the Development Plan, so far as material to the application;
- any local finance considerations, so far as material to the application; and
- to any other material considerations.

- 3.2 What does it mean that Members must have regard to the Development Plan? Section 38(6) of the Planning and Compulsory Purchase Act 2004 explains that having regard to the Development Plan means deciding in accordance with the Development Plan, unless material considerations indicate otherwise. If the Development Plan is up to date and contains material policies (policies relevant to the application) and there are no other material considerations, the application should be determined in accordance with the Development Plan.

The Local Development Plan and Other Material Considerations

- 3.3 The relevant Development Plan policies against which the Committee is required to consider each planning application are to be found in:
 - The London Plan 2016;

- The Tower Hamlets Core Strategy Development Plan Document 2025 adopted in 2010; and
 - The Managing Development Document adopted in 2013.
- 3.4 The Planning Officer's report for each application directs Members to those parts of the Development Plan which are material to each planning application, and to other material considerations. National Policy as set out in the National Planning Policy Framework 2019 (**NPPF**) and the Government's online Planning Practice Guidance (PPG) are both material considerations.
- 3.5 One such consideration is emerging planning policy such as the Council's Local Plan¹ and the Mayor of London's New London Plan². The degree of weight which may be attached to emerging policies (unless material considerations indicate otherwise) depends on the stage of preparation of the emerging Development Plan, the extent to which there are unresolved objections to the relevant policies, and the degree of consistency of the relevant policies in the draft plan to the policies in the framework. As emerging planning policy progresses through formal stages prior to adoption, it accrues weight for the purposes of determining planning applications (NPPF, paragraph 48).
- 3.6 Having reached an advanced stage in the preparation process, the Local Plan now carries more weight as a material consideration in the determination of planning applications. However, the policies will not carry full weight until the Local Plan has been formally adopted. The New London Plan is at a less advanced stage of the adoption process.
- 3.7 The purpose of a Planning Officer's report is not to decide the issue for the Committee, but to inform Members of the considerations relevant to their decision making and to give advice on and recommend what decision Members may wish to take. Part of a Planning Officer's expert function in reporting to the Committee is to make an assessment of how much information to include in the report. Applicants and objectors may also want to direct Members to other provisions of the Development Plan (or other material considerations) which they believe to be material to the application.
- 3.8 The purpose of Planning Officer's report is to summarise and analyse those representations, to report them fairly and accurately and to advise Members what weight (in their professional opinion) to give those representations.
- 3.9 Ultimately it is for Members to decide whether the application is in accordance with the Development Plan and if there are any other material considerations which need to be considered.

Local Finance Considerations

- 3.10 Section 70(2) of the TCPA 1990 provides that a local planning authority shall have regard to a local finance consideration as far as it is material in dealing with the application. Section 70(4) of the TCPA 1990 defines a local finance consideration and both New Homes Bonus payments (**NHB**) and Community Infrastructure Levy (**CIL**) fall within this definition.

¹ The Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits' was submitted to the Secretary of state for Housing, Communities and Local Government to undergo an examination in public on 28 February 2018. As part of the examination process, the planning inspector held a series of hearing sessions from 6 September to 11 October 2018 to discuss the soundness of the Local Plan. The planning inspector has put forward a series of modifications as part of the examination process in order to make it sound and legally compliant. These modifications are out to consultation for a 6 week period from 25 March 2019.

² The draft New London Plan was published for public consultation in December 2017, The examination in public commenced on 15 January 2019 and is scheduled until mid to late May 2019.

- 3.11 Although NHB and CIL both qualify as “*local finance considerations*”, the key question is whether they are “material” to the specific planning application under consideration.
- 3.12 The prevailing view is that in some cases CIL and NHB can lawfully be taken into account as a material consideration where there is a direct connection between the intended use of the CIL or NHB and the proposed development. However to be a ‘material consideration’, it must relate to the planning merits of the development in question.
- 3.13 Accordingly, NHB or CIL money will be ‘material’ to the planning application, when reinvested in the local areas in which the developments generating the money are to be located, or when used for specific projects or infrastructure items which are likely to affect the operation or impact on the development. Specific legal advice will be given during the consideration of each application as required.

Listed Buildings and Conservation Areas

- 3.14 Under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant listed building consent for any works, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 3.15 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed buildings or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
- 3.16 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development in a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

Trees and Natural Environment

- 3.17 Under Section 197 of the TCPA 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
- 3.18 Under Section 40 of the Natural Environment and Rural Communities Act 2006 (Duty to conserve biodiversity), the local authority “*must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*”.

Crime and Disorder

- 3.19 Under Section 17 of the Crime and Disorder Act (1998) (Duty to consider crime and disorder implications), the local authority has a “*dutyto exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment)...*”

Transport Strategy

- 3.20 Section 144 of the Greater London Authority Act 1999, requires local planning authorities to have regard to the London Mayor’s Transport strategy.

Equalities and Human Rights

- 3.21 Section 149 of the Equality Act 2010 (Public Sector Equality Duty) (**Equality Act**) provides that in exercising its functions (which includes the functions exercised by the Council as Local Planning Authority), that the Council as a public authority shall amongst other duties have due regard to the need to-
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Equality Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 3.22 The protected characteristics set out in Section 4 of the Equality Act are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Equality Act.
- 3.23 The Human Rights Act 1998, sets out the basic rights of every person together with the limitations placed on these rights in the public interest. Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. Members need to satisfy themselves that the potential adverse amenity impacts are acceptable and that any potential interference with Article 8 rights will be legitimate and justified. Both public and private interests are to be taken into account in the exercise of the Council's planning authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. Members having regard to the Human Rights Act 1998, to take into account any interference with private property rights protected by the European Convention on Human Rights and ensure that the interference is proportionate and in the public interest.

Environmental Impact Assessment

- 3.24 The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 Regulations). Subject to certain transitional arrangements set out in regulation 76 of the 2017 Regulations, the 2017 regulations revoke the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (2011 Regulations).
- 3.25 The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process. The 2017 Regulations set out a procedure for identifying those projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects.
- 3.26 The Environmental Statement, together with any other information which is relevant to the decision, and any comments and representations made on it, must be taken into account by the local planning authority in deciding whether or not to grant consent for the development.

Third Party Representations

- 3.27 Under section 71(2)(a) of the TCPA 1990 and article 33(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Committee is required, to

take into account any representations made within specified time limits. The Planning Officer report directs Members to those representations and provides a summary. In some cases, those who have made representations will have the opportunity to address the Committee at the meeting.

Daylight, Sunlight and Overshadowing

- 3.28 Amenity impacts resulting from loss of daylight and sunlight or an increase in overshadowing are a common material planning consideration. Guidance on assessment of daylight and sunlight is provided by the 'Site Layout Planning for Daylight and Sunlight' 2011 by BRE (the BRE Guide). The BRE Guide is purely advisory and an appropriate degree of flexibility needs to be applied when using the BRE Guide. The BRE Guide does not form part of the Development Plan and compliance is not a statutory requirement.
- 3.29 There are two methods of assessment of impact on daylighting: the vertical sky component (VSC) and no sky line (NSL). The BRE Guide specifies that both the amount of daylight (VSC) and its distribution (NSL) are important. According to the BRE Guide, reductions in daylighting would be noticeable to occupiers when, as a result of development:
- a) The VSC measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value; or
 - b) The area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.
- 3.30 The BRE Guide states that sunlight availability would be adversely affected if the centre of a window receives less than 25% of annual probable sunlight hours or less than 5% of probably sunlight hours between 21 September and 21 March and receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight over the whole year of over 4%.
- 3.31 For overshadowing, the BRE Guide recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21st March with ratio of 0.8 times the former value being noticeably adverse.
- 3.32 Specific legal advice will be given in relation to each application as required.

General comments

- 3.33 Members are reminded that other areas of legislation cover aspects of building and construction and therefore do not need to be considered as part of determining a planning application. Specific legal advice will be given should any of that legislation be raised in discussion.
- 3.34 The Committee has several choices when considering each planning application:
- To grant planning permission unconditionally;
 - To grant planning permission with conditions;
 - To refuse planning permission; or
 - To defer the decision for more information (including a site visit).

4. PUBLIC SPEAKING

- 4.1 The Council's constitution allows for public speaking on these items in accordance with the rules set out in the constitution and the Committee's procedures. These are set out at the Agenda Item: Recommendations and Procedure for Hearing Objections and Meeting Guidance.

5. RECOMMENDATION

- 5.1 The Committee to take any decisions recommended in the attached reports.



DEVELOPMENT COMMITTEE

04/06/2020

Report of the Corporate Director of Place

Classification: Unrestricted

Application for Planning Permission

[click here for case file](#)

Reference	PA/19/02579
Site	Lamb Court, 69 Narrow Street, London E14
Ward	Limehouse
Proposal	The erection of a 4 storey building comprising one studio unit and two, 2 bedroomed self-contained flats, with a reception and concierge area on the ground floor.
Summary Recommendation	Grant planning permission subject to conditions
Applicant	Secure Reversions Ltd
Architect/agent	Silk Mews Architects Ltd
Case Officer	John Miller
Key dates	<ul style="list-style-type: none">- Application registered as valid on 25/11/2019- Amendments received on 17/02/2020- Public consultation finished on 23/01/2020

EXECUTIVE SUMMARY

The applicant proposes the construction of a four storey building containing 3 self-contained flats and concierge facilities.

Officers have assessed the proposal against the provisions of the Development Plan and other material considerations and recommend approval of planning permission, subject to conditions.

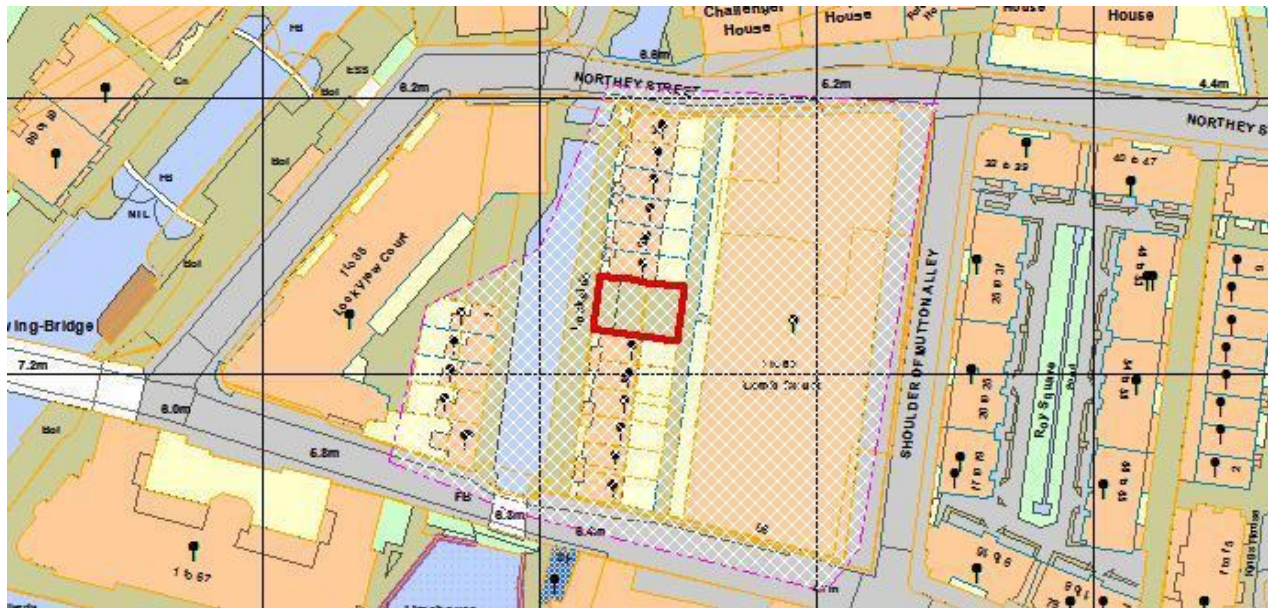
The proposal would provide additional homes in a sustainable location. The proposal would be acceptable in terms of its height, scale, design, appearance, and impact to the conservation area.

The scheme would result in no undue impacts to the residential amenities of the neighbouring occupiers and the quality of accommodation provided, along with the provision of external amenity space, would create a good standard of accommodation for the future occupiers of the site.

The proposal would result in the loss of six existing category B maple trees on the site. As mitigation, 6 new trees would be provided to the rear of the proposed building. With the

introduction of native trees, shrub planting and the addition bird and bat boxes, proposal would provoke a net gain in biodiversity.

SITE PLAN



Legend:

Site boundary: red line

Consultation boundary: pink line

1. SITE AND SURROUNDINGS

- 1.1 The site comprises a rectangular shaped piece of land, situated between numbers 12 and 14 Albert Mews. There are no buildings on the site and the land is used as an access way to Lamb Court to the east. The site is gated, allowing entry only for residents with a fob key. The site leads through to a car parking area within the Lamb Court development to the rear, with access to the Lamb Court flats themselves via an external stair case. There are 6 maple trees on site.
- 1.2 The surrounding area is predominantly residential in nature. To either side of the site lie the row of terraces on Albert Mews, which have pitched roofs and front bays at first floor with Juliette balconies.
- 1.3 The site sits within the Narrow Street Conservation Area. There are no listed or locally listed building within the immediate vicinity. The application site is located within flood zones 2 and 3 and an Archaeological Priority Area.

2. PROPOSAL

- 2.1 The applicant requests permission for the erection of a 4 storey building (with the 4th storey being within the roof space), containing one studio unit and two, 2 bedroomed flats on the upper floors and a reception and concierge area on the ground floor.
- 2.2 The ground floor would comprise a lobby and concierge room, washroom, storage cupboard and an enclosed cycle store. Occupiers of the Lamb Court flats would enter the building from Albert Mews and walk through the lobby and into the Lamb Court parking area, with staircase to the flats. In this regard, the access route to Lamb Court would remain unchanged with the development in place, with the exception of the requirement to use the entrance doors as opposed to the gates, on Albert Mews.
- 2.3 The first and second floors would contain 2, two bedroom flats with balconies on the western elevation, fronting onto Albert Mews. The third floor would contain a studio unit with a balcony on the eastern elevation, fronting onto the central courtyard and Lamb Court.
- 2.4 The 6 maple trees lost to the development will be replaced by 6 new trees on the site.

3. RELEVANT PLANNING HISTORY

- 3.1 PA/18/00074 - Erection of a 4 storey building comprising 1 x 1b unit and 2 x 2b units above the proposed Reception and Concierge Area on the ground floor. Refused 10/09/2018. Appealed under ref APP/E5900/W/19/3220899 – Dismissed 24/05/2019
- 3.2 The appeal was dismissed by reason of the unsympathetic appearance of the proposal and its subsequent impact on the special character of the Narrow Street Conservation Area

4. PUBLICITY AND ENGAGEMENT

- 4.1 Following the receipt of the application, the Council notified 143 nearby owners/occupiers by post. Site notices were also erected nearby.
- 4.2 A total of 31 letters of objection were received.
- 4.3 The issues raised in the objection letters are as follows:

Design and impact on the conservation area

- Rear roof addition not sympathetic to the conservation area

- Overall design not sympathetic to the conservation area

Fire Safety and Access

- Proposal would block a potential fire exit
- Pump appliance access and water supplies for the fire service have not been addressed
- The current site provides a right of way for residents of The Albert Mews
- The entrance arrangement would prevent those less able from entering

Biodiversity and Trees

- Loss of trees
- Impact on local wildlife
- Loss of open space

Amenity

- Impact on light to windows
- Overlooking
- Noise and disturbance from increased footfall
- Dust, noise and pollution during construction

Highways

- Increase demand on parking

Other

- Disingenuous information stating that residents support scheme
- Impacts to health and well being

5. CONSULTATION RESPONSES

Internal

Trees officer

- 5.1 No objection, given that the maple trees would be replaced and subject to a condition which secures this.

Biodiversity

- 5.2 No objection subject to conditions regarding nesting birds and biodiversity enhancements.

Highways

- 5.3 No objection subject to a permit free agreement. All cycle facilities are to be retained their permitted use only for the life of the development. Unrestricted access for residents of Lamb Court (as currently exists) must be maintained at all times

Waste

- 5.4 No objection – The proposed arrangement to use the existing waste provision for Lamb Court is considered acceptable. Concern is raised with regards to the trolleying distance.

External

London Fire and Emergency Planning Authority

- 5.5 No comment. Concern was previously raised with regards to pump appliance access and water supply. The proposal should conform with the requirements of part B5 of approved document B.

Officer note: This will be addressed in the main body of the report.

Canal and River Trust

- 5.6 No objection

Environment Agency

- 5.7 No objection subject to the proposal being carried out in accordance with the measures detailed in the submitted flood risk assessment including evacuation measures, finished floor levels and flood resilience.

Port of London Authority

- 5.8 No objection

Historic England Archaeology

- 5.9 No Objection subject to securing a written scheme of investigation by condition.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

- 6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.

- 6.2 In this case the Development Plan comprises:

- The London Plan 2016 (LP)
- Tower Hamlets Local Plan 2031 Managing Growth and Sharing the Benefits (2020)

- 6.3 The key development plan policies relevant to the proposal are:

Housing S.H1, D.H2, D.H3
(unit mix, housing quality)

Design S.DH1, S.DH2, S.G1, D.DH2
(layout, massing, materials, public realm)

Amenity S.DH1, D.DH8
(privacy, outlook, daylight and sunlight, construction impacts)

Transport D.MW3, D.TR2, D.TR3, D.TR4, S.TR1
(sustainable transport, highway safety, car and cycle parking, waste, servicing)

Environment D.ES3

(urban greening & biodiversity)

6.4 Other policy and guidance documents relevant to the proposal are:

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- LP Housing SPG (updated 2017)
- The Narrow Street Conservation Area Character Appraisal

Emerging Policy

6.5 The new London Plan is currently in draft form. The weight carried by most emerging policies is substantial. Some policies are subject to Secretary of State Directions made on 13/03/2020 and these policies have only limited or moderate weight. The statutory presumption still applies to the London Plan 2016 up until the moment that the new plan is adopted.

Relevant draft London Plan policies:

- D4 – Delivering good design
- D6 – Housing standards
- HC1 – Heritage

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Design
- iv. Heritage
- v. Neighbour Amenity
- vi. Transport
- vii. Environment

Land Use

7.2 London Plan Policy 3.3 seeks to ensure the pressing need for more homes in London is recognised by increasing the supply of housing. Policy 3.8 seeks to ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.

7.3 The proposal seeks planning permission the construction of a 4 storey building to provide 1 studio and 2, 2 bedroom flats.

- 7.4 The proposal would support and contribute to the council's strategic aims in respect of the provision of housing to meet local need.
- 7.5 Concern has been raised with regards to the current use of the land, which appears to be 'open space'. Whilst the site contains no buildings and is verdant in appearance, it is not designated within the Development Plan as any form of open space.
- 7.6 In light of this and with reference to the above policies which seek to maximise the provision of housing, it is considered that the proposal is acceptable in land use terms

Housing

Mix of unit sizes

- 7.7 Pursuant to Policy 3.8 of the London Plan, new residential development should offer genuine housing choice, in particular a range of housing size and type. LBTH Policy D.DH2 seeks to secure a mixture of small and large housing. Specific guidance is provided on particular housing types and is based on the Council's most up to date Strategic Housing Market Assessment (2017).
- 7.8 The application proposes 3 residential units – 2, 2 bedroom flats and 1 studio flat. Given the small size of the scheme which precludes the provision of an entirely policy compliant scheme and given that the proposal provides 2 bedrooomed units, for which there is the most need, the mix is supported.

Quality of Residential Accommodation

- 7.9 GLA's Housing SPG aims to ensure that housing is "*fit for purpose in the long term, comfortable, safe, accessible, environmentally sustainable and spacious enough to accommodate the changing needs of occupants throughout their lifetime*". The document provides advice on a number of aspects including the design of open space, approaches to dwellings, circulation spaces, internal space standards and layouts, the need for sufficient privacy and dual aspect units.
- 7.10 All proposed dwellings accord with required internal space standards and external amenity space standards, as set out in the tables below:

Dwelling Type	GIA (m ²) Required	GIA Provided	Built in Storage (m ²)	Built-in Storage Provided
1b Studio /2p	37	37.02	1.5	3.00
2b/3p	61	64.87	2	4.60

Table showing floorspace/internal requirements

Dwelling Type	Amenity (m ²) Required	Amenity Provided
1b/2p	5	5.63m ²
2b/3p	7	7.01m ²

Table showing amenity space requirements

- 7.11 The 2 bedrooomed units would be dual aspect accommodation with good levels of light, outlook and through ventilation. The studio flat in the roofspace would be single aspect, by reason of the design restrictions associated with the sites conservation area location. The flat would,

however, contain a large west facing window with balcony space and overall would provide a good standard of accommodation for the future occupiers.

- 7.12 The proposed development would provide a good standard of internal and external accommodation in line with policy requirements.

Design/Heritage

- 7.13 Development Plan policies requires that schemes are of high quality design that reflects local context and character and provides attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.
- 7.14 Local Plan policy S.DH3 requires that developments in conservation areas preserve the elements that contribute to their special character.
- 7.15 The proposed building would be 4 storeys high, with the top floor being within the roofspace. The ridge height of the building would match the ridge height of the host terrace and the front and rear building lines of the proposal would be consistent with the building lines of the adjoining terraces. The form of the proposed dwelling, with hipped roof and brick facades, would reflect the character of the host terrace. It is considered that the scale, height and mass of the building would be in keeping with the scale and appearance of the surrounding built form.
- 7.16 When compared to the previously refused scheme which was subsequently dismissed at appeal, the current proposal has been redesigned to take into account the comments made by both Members and the Planning Inspector. The most significant change is the removal the eastern/front dormer window. In relation to the front dormer the Inspector stated that it would 'disrupt the uncomplicated and plain roofscapes along both sides of Albert Mews. Furthermore, it would give the building an overly bulky appearance and fail to appear subservient to the terraces even though it would be set down from one of the adjacent properties."
- 7.17 Officers agree that the removal of the front facing dormer window has reduced the impact of the development on the Conservation Area to an acceptable level. The rear dormer is to be retained but this element of the proposal does not front onto a public highway. Glimpsed public views of it would be afforded from Narrow Street and Northey Street, but it is not considered that the proposal would appear harmful in these views. The proposed building would now sit comfortably within the host terrace and would appear as a continuation of the existing buildings, which is supported. The window size and arrangement aligns with the pattern of windows within the wider terrace.
- 7.18 Overall the proposal is considered to be well designed and utilises high quality robust and traditional materials which are appropriate within the existing urban fabric of the Conservation Area. The submission has undergone a number of additional design changes since the previously refused scheme, which further address concerns of bulk and design. These include:
- The reduction in size of the rear dormer
 - Front balconies have been centred within the façade
 - The front glazed doors have been reduced in width
 - Planters either side of the front entrance are now unobstructed by balconies above
 - The concierge area has been reduced in size and is now located to the right of the entrance
 - A ramp has been incorporated into the reception area to provide inclusive access to the WC

- 7.19 The proposal has also been amended since submission to remove the rooflights from the front elevation of the building, as these are not typical the host terrace nor the wider Conservation Area.
- 7.20 With the cited improvements outlined above, officers consider that the proposal would be in keeping with the appearance of the street. In addition, the proposal would preserve the special character of the Narrow Street conservation area, in compliance with Local Plan policies and section 72 of the Planning (Listed Building and Conservation Area) Act 1990. In addition, the proposal would not harm the significance of the designated asset, in compliance with the relevant paras of the NPPF.

Neighbour Amenity

- 7.21 Development Plan policies seek to protect neighbour amenity, safeguarding privacy and the peaceful enjoyment of ones dwelling and ensuring acceptable daylight and sunlight conditions.

Privacy, Outlook, Daylight & Sunlight

- 7.22 The rear elevation of the proposed building would sit approximately 22m away from the nearest facing habitable room windows at Lamb Court. The front elevation of the building would sit approximately 18m away from number 1 Albert Mews. These separation distances will ensure that there will be no undue overlooking or loss of privacy to the occupiers of either the existing properties or the proposed dwellings, with the development in place.
- 7.23 Concern has been raised regarding potential overlooking from the front balconies into neighbouring windows. This would be addressed through the incorporation of screening to the sides of the balconies, which will be obscure glazed and secured by condition.
- 7.24 The proposed building would not project significantly beyond the existing building lines of the properties adjoining the site on Albert Mews and there would as such be no undue loss of light to, or outlook from, the windows of these properties with the development in place. Given the separation distances between the proposal and the dwellings to the west and east, there would be no undue loss of light to, or outlook from, these windows, nor would there be any undue sense of enclosure, as experienced from the homes or gardens of surrounding properties.
- 7.25 The proposed development is considered to be acceptable with regards to impact on neighbouring amenity. .

Noise & Vibration

- 7.26 Concern has been raised with regards to a possible increase in noise, by reason of the intensified use of the site for residential purposes. It is noted that this is an urban residential area and it is considered that the addition of 3 new homes would not lead to any undue increase in footfall or disturbance in the area. The proposed balconies are small and would provide the future occupiers with policy compliant outdoor space. Any noise emanating from these balconies cannot be anticipated to exceed normal domestic levels.

Construction Impacts

- 7.27 Demolition and construction activities are likely to cause some noise and disturbance to nearby residents, including matters of additional traffic generation and dust. In accordance with relevant Development Plan policies and for the peaceful enjoyment of neighbouring dwellings, a number of conditions are recommended to minimise these impacts. These would control working hours and require the approval and implementation of Construction Management Plan.

Transport and Pedestrian Movement around the Site

- 7.28 Development Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.
- 7.29 In line with council policy to promote car free developments, the applicant is required to enter into a legal agreement, which would prevent future occupiers of the proposed dwellings from obtaining on-street parking permits.
- 7.30 Five new safe and secure cycle parking spaces will be provided and located at the rear of the new reception area. A condition will be imposed requiring all cycle facilities to be retained and maintained for the use of the future residents for the life of the development.
- 7.31 In relation to pedestrian access to Lamb Court via Albert Mews with the development in place, as previously noted, the travel route would remain as existing. It is proposed that a full time manager will oversee the reception area during normal working hours and will provide access to Lamb Court residents. Out of normal working hours, residents of Lamb Court will be able to enter via a security code as per the existing arrangement. The appeal Inspector confirmed that access arrangements could be secured through a suitably worded condition. Such a condition will be added to any consent of planning permission.
- 7.32 It is proposed that the new dwellings would utilise the existing communal refuse and recycling storage facilities provided for the residents of Lamb Court. The bin stores are located at undercroft level and would be accessed via the rear yard.
- 7.33 Whilst some concern was raised from the Council's waste officer surrounding the trolleying distance, the arrangements are considered acceptable given the constrained nature of the site.

Environment

Landscaping & Biodiversity

- 7.34 Six Category B trees within the proposed development site will be removed to facilitate the proposed development. The Planning Inspector determined that this loss was mitigated appropriately through the proposed biodiversity enhancements. To mitigate the loss of the field maple trees from the site, a number of replacement heavy standard maple trees will be provided on the site post-development. Further details of the replacement trees will be secured via condition. Whilst it is acknowledged that the proposed trees will not be publically visible and therefore will not hold the same level of amenity value as the existing trees, additional planting will be undertaken on the publically visible western side of the building, including shrubs and herbaceous plants which will further add to the soft landscaping of the site and contribute to the verdant character of the conservation area.
- 7.35 The following additional biodiversity enhancement measures have been proposed:
- The addition of native tree and shrub planting
 - The addition of at least three bat boxes,
 - Three bird boxes
- 7.36 Tree and biodiversity officers have raised no objections and the above measures will be secured by condition.
- 7.37 The proposed development is considered to be acceptable in terms of biodiversity.

Flood risk

- 7.38 The site is located within Flood Zone 3 and is protected to a very high standard by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year.
- 7.39 In addition, measures set out in the flood risk assessment regarding evacuation measures, finished floor levels and flood resilience measures are considered sufficient. The Environment agency has reviewed the submitted documents and raises no objection.

Other Matters

- 7.40 Whilst the London Fire department did not comment on this application, they previously requested that the location of the dry risers conform to the latest approved Building Regulations Document B. This is a building regulations issue and will be secured and assessed outside of planning.
- 7.41 In addition to this, the applicant has committed to a sprinkler system will be incorporated into the scheme during its construction in accordance with BS 9251:2014 (or BS EN 12845).
- 7.42 In terms of accessibility, the ground floor area is now served by a ramp so that wheelchair users and those less able can safely enter and exit the site.

Human Rights & Equalities

- 7.43 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.
- 7.44 The proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

- 8.1 Conditional planning permission is GRANTED subject to below conditions.

8.2 Planning Conditions

Compliance

1. 3 years deadline for commencement of development.
2. Development in accordance with approved plans.
3. Restrictions on demolition and construction activities:
 - a. All works in accordance with Tower Hamlets Code of Construction Practice;
 - b. Standard hours of construction and demolition;
 - c. Air quality standards for construction machinery;
 - d. Ground-borne vibration limits; and
 - e. Noise pollution limits.
4. Delivery and retention of waste storage facilities.
5. Delivery and retention of cycle storage facilities.
6. Noise insulation standards for new residential units.
7. Delivery and retention of obscure glazing to balconies
8. 24 Hour ground access for Lamb Court Residents

Pre-commencement

9. Construction Environmental Management Plan:
 - a. Site manager's contact details and complain procedure;
 - b. Dust and dirt control measures
 - c. Measures to maintain the site in tidy condition, disposal of waste
 - d. Recycling/disposition of waste from demolition and excavation
 - e. Safe ingress and egress for construction vehicles;
 - f. Parking of vehicles for site operatives and visitors;
 - g. Location and size of site offices, welfare and toilet facilities;
 - h. Erection and maintenance of security hoardings;
 - i. Measures to ensure that pedestrian and cycle access past the site is safe and not unduly obstructed; and
 - j. Measures to minimise risks to pedestrians and cyclists, including but not restricted to accreditation of the Fleet Operator Recognition Scheme (FORS) and use of banksmen for supervision of vehicular ingress and egress
10. Details of external facing materials and architectural detailing.
11. Archaeology Written Scheme of Investigation (in consultation with Historic England).
12. Full arboricultural and tree protection plan
13. Details of biodiversity enhancements including details of additional trees

Prior to occupation

14. 'Car Free' on-street parking permit restrictions (bar Blue Badge holders and Permit Transfer Scheme)

8.3 Informatives

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Written schemes of Investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

APPENDIX 1

Drawings

Documents and Reports

Design and Access statement; Flood Risk assessment QFRA 794; Planning and Heritage Statement; Pre-determination investigation report: Archaeological monitoring of geotechnical trial pits; Historic environment assessment

Plans and Drawings

1209.00; 1209.01; 1209.02; 1209.03 1209.04; 1209.05; 1209.06; 1209.07; 1209.11B; 1209.12F; 1209.13E; 1209.14C; 1209.15C; 1209.16C; 1209.19A 1209.20; 1209.23; 1209.25C; 1209.27E; P-001 Rev P1; P-101 Rev P1

Figure 1 – Proposed floor plans



Figure 5 – Proposed front elevation

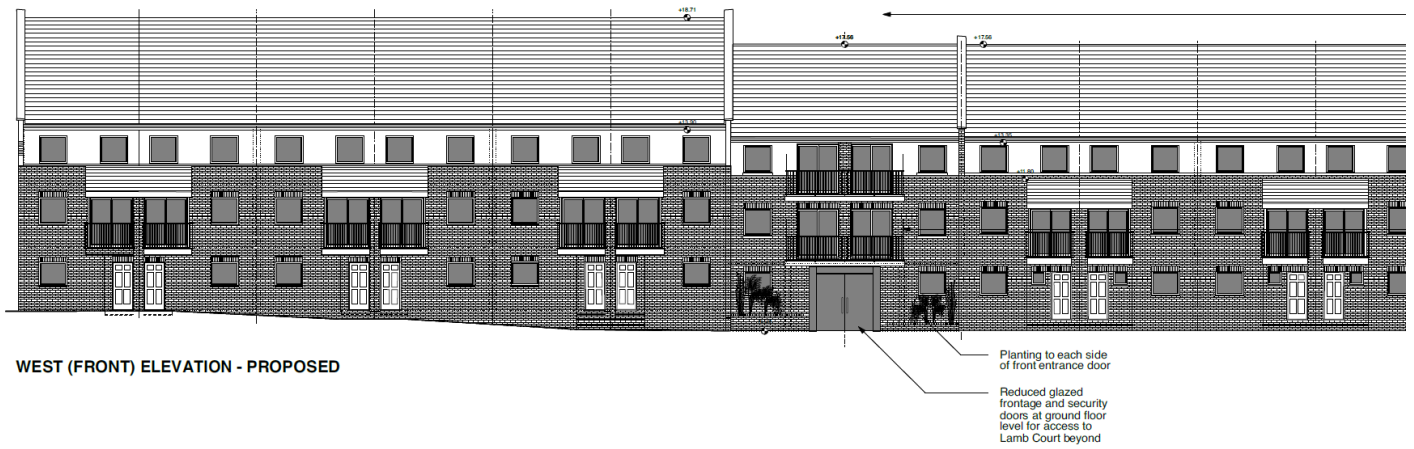


Figure 6 – Proposed rear elevation

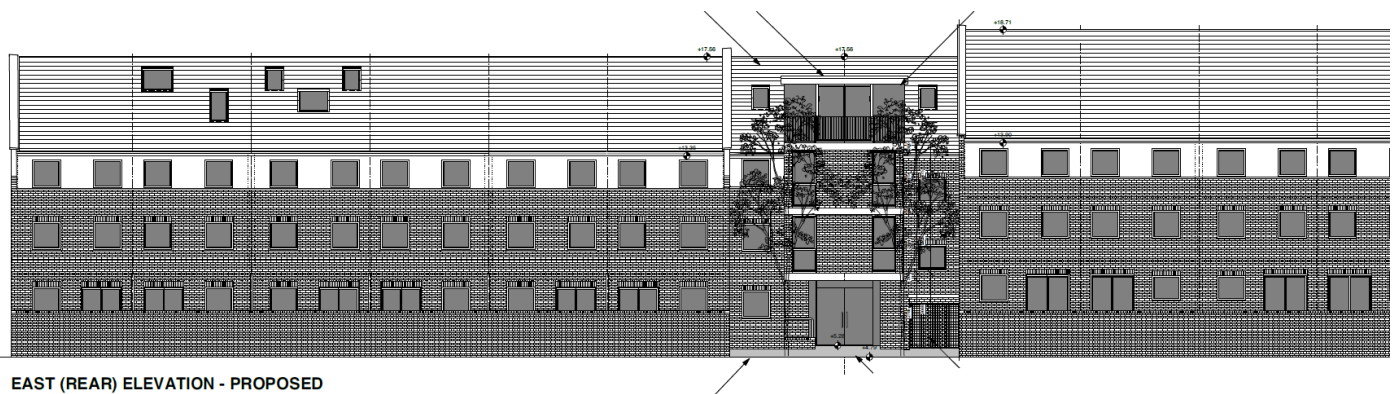


Figure 7 – CGI s



LOOKING SOUTH ALONG ALBERT MEWS



LOOKING NORTH ALONG ALBERT MEWS



LOOKING EAST ACROSS LOCK TO FRONT ELEVATION



LOOKING NORTH WEST FROM PODIUM OF LAMB COURT

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Application for Planning Permission

[click here for case file](#)

Reference	PA/19/02281
Site	Bow Exchange, 5 Yeo Street, London E3 3QP
Ward	Bromley South
Proposal	Demolition of the existing building and redevelopment of the site comprising the erection of 4 to 9 storey building to provide 2,471sqm of flexible B1c workspace at ground and mezzanine level and 92 residential units (Use Class C3) on the upper floors, together with landscaped public open space, communal amenity space, on-site child play space, waste storage, cycle parking and disabled car parking.
Summary Recommendation	Approve planning permission subject to conditions and a legal agreement.
Applicant	City and Suburban Homes Ltd
Architect	pH+ Architects & CMA Planning Ltd.
Case Officer	Matthew Wong
Key dates	<ul style="list-style-type: none">- Application registered as valid on 02/12/2019- Letters sent to neighbours on 06/12/2019

EXECUTIVE SUMMARY

The application site contains a 3 storey warehouse style building which was last used as mixed office, light industrial and storage space. The site adjoins the Limehouse Cut Conservation area, which includes the canal itself.

The proposed development comprises the erection of a 9 storey (plus mezzanine) building which would provide 92 residential units and 2,383 square metres of B1(c) creative workspace at ground and mezzanine levels.

In land use terms, the loss of an element of business floorspace is considered to be outweighed by the provision of a high quality, mixed use scheme which would contribute to the broader regeneration of the area and which provides a significant opportunity to enhance an underused site by providing public access to a new section of canal side walk.

The scheme would provide 10% affordable workspace and 35% affordable housing by habitable room, including a variety of unit typologies across both tenures. Residential dwellings would provide a good standard of internal accommodation and generous private and communal amenity space and child play space.

The height, massing and design of the proposed development would appropriately respond to the local context. The detailed architecture is considered to be of high quality and the development would preserve the special character of the Limehouse Cut conservation area.

The proposal would impact upon the daylight and sunlight to some habitable rooms on the north side of Yeo Street and at Caspian Wharf adjoining the site. The impacts have been quantified and carefully assessed. It is considered that the impacts are acceptable in this urban context.

Parking access and servicing are considered to be acceptable subject to conditions and the submission of a Travel Plan.

A strategy for minimising carbon dioxide emissions from the development is in compliance with policy requirements. Biodiversity enhancements are also proposed which are considered sufficient to meet policy requirements.

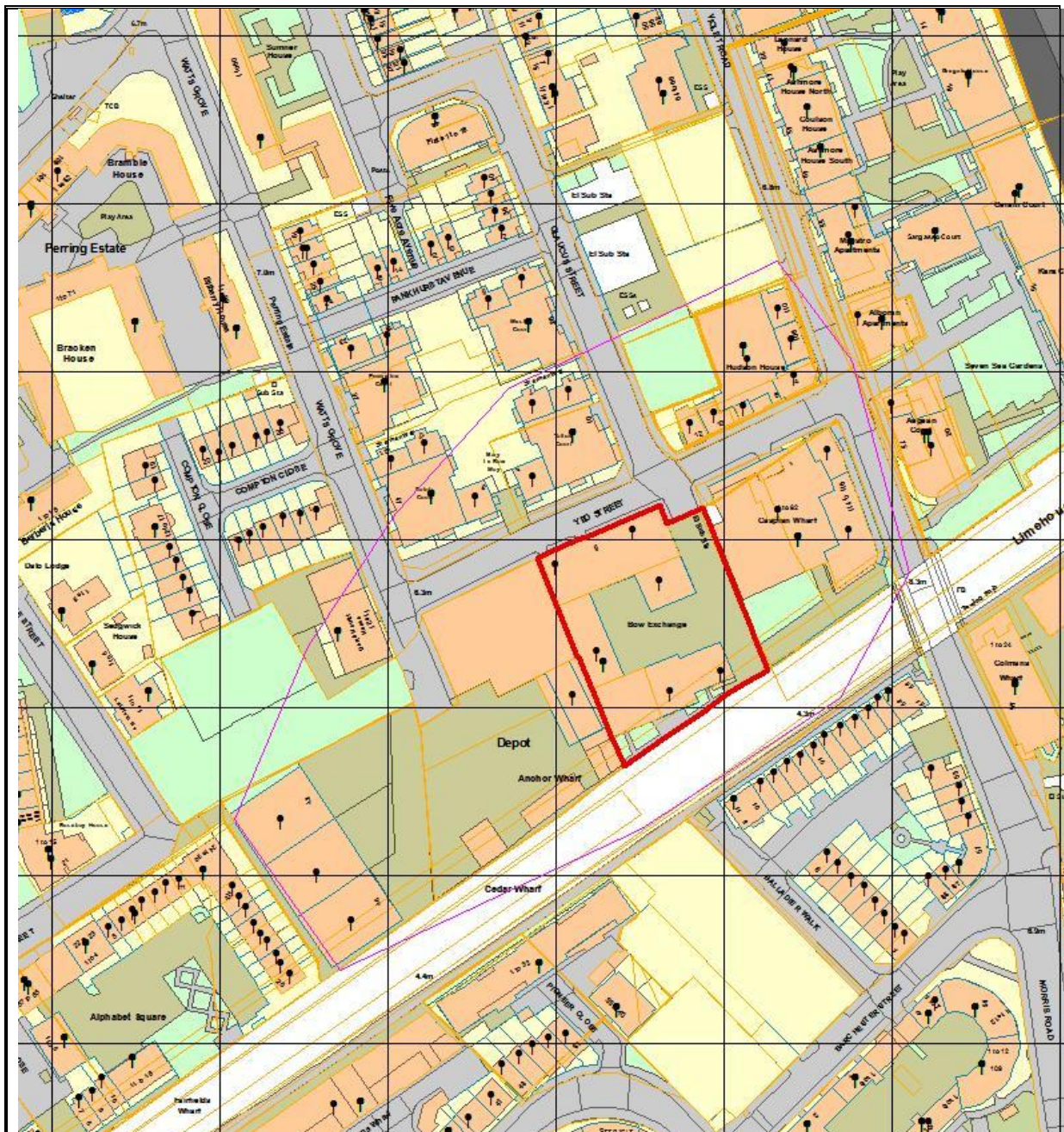
The scheme would be liable for both the Mayor of London's and the Borough's Community Infrastructure Levy. In addition, the development would provide a necessary and reasonable planning obligation to local employment and training.

Heads of Terms have been agreed and officers recommendation is subject to a Section 106 Agreement containing a number of financial and non-financial contributions that would provide further benefit to the community.


This application has been considered against the Council's approved planning policies contained in the London Borough of the Tower Hamlets Local Plan 2031 (January 2020) as well as the London Plan (2016), the National Planning Policy Framework and all other material considerations. Officers have also considered the application against the Draft London Plan (2019) as this carries substantial weight.

Officers recommend the proposed development be granted planning permission.

SITE PLAN:



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<ul style="list-style-type: none"> Planning Application Site Boundary Other Planning Applications Consultation Area Land Parcel Address Point Locally Listed Buildings Statutory Listed Buildings 	<p>Planning Applications Site Map PA/19/02281</p> <p>This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process.</p> <p>Scale : 50m grid squares</p>	 <p>TOWER HAMLETS</p> <p>London Borough of Tower Hamlets</p> <p>Date: 27</p>
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1. SITE AND SURROUNDINGS

- 1.1 The application site covers a land area of approximately 3000sqm and contains a 3 storey building with office and warehouse uses. The building is faced in brick and metal cladding. The remainder of the site comprises of hardstand areas for servicing and vehicular access/parking. Access to the site is gained through a single gated vehicular access off Yeo Street.
- 1.2 The site is bound to the north by Yeo Street and the recently constructed flats known as Saints Court and Tallow Court. To the south lies the Limehouse Cut Canal. To the west lie the warehouse buildings at Anchor Wharf and to the East, the recently constructed 'Caspian Wharf'. The heavily trafficked Violet Road is located further east.



Aerial view of the site and surroundings



View of the building from west of the site on Yeo Street

- 1.3 The existing building contains 13 vacant office (B1a), light industrial (B1c) and storage (B8) units, with a total floorspace of 3,445 sqm.
- 1.4 The site is not located within a conservation area, nor are there any locally or statutorily listed buildings within the vicinity. The site does however adjoin the Limehouse Cut Canal Conservation Area to the south, which includes the canal itself.
- 1.5 The site has no particular policy designations, although the Caspian Wharf Neighbourhood Shopping Parade on Violet Road lies some 50m to the west. Devons Road DLR Station and Langdon Park DLR Station are approx. 500m away from the site. Approximately 1km to the north-east of the site is the Bromley by Bow Underground Station which connects the site to the wider London public transport network. The site has a public Transport Accessibility (PTAL) rating of 3 which indicates a moderate level of accessibility.
- 1.6 The area around the Limehouse Cut historically contained to a number of active warehouse and industrial type uses. The area has seen substantial change in recent years, with many warehouse sites redeveloped to provide mixed use developments, with the predominant use being residential. The Caspian Wharf development immediately to the east of the site created a section of 'canal walkway', accessed from Violet Street.
- 1.7 In terms of building heights in the vicinity, the Caspian Wharf development is predominantly 5-6 storeys high with a tower element of 7 storeys. The flats opposite the site on Yeo Street are 7 storeys high.

2. PROPOSAL

- 2.1 The applicant proposes the demolition of the existing buildings and the construction of a new mixed-use building, providing 2471sqm of B1c workshop space at ground and mezzanine floors and 92 self-contained flats above. Public space would be provided in the form of a canal side walkway which would link with and continue the walkway at Caspian Walk. Traffic free public access would also be provided from Yeo Street to the canal side, in the form of a 'promenade' walkway to the west of the site.
- 2.2 A total of 10% of the proposed B1c workspace would be 'affordable workspace' and a total of 35% of the proposed flats would be affordable, with a tenure split of 71% affordable rented and 29% intermediate housing.
- 2.3 In terms of size and design, the building would have 3 stories above mezzanine level fronting the canal, stepping up a maximum height of 8 stories above mezzanine level on the north western corner of the site. The elevations of the building are stepped and angled with balconies which sit entirely within the footprint of the buildings. Materials would be predominantly brick with a dark metal cladding.
- 2.4 The B1c units would provide activated 'shopfront' facades onto Yeo Street, the promenade and the canal. The residential unit would be accessed via entrances on the promenade. Cycle parking and waste storage for the residential units would be provided at ground floor level, accessed from the communal lobbies.
- 2.5 Deliveries and Servicing for the commercial element of the scheme would take place on site, in a dedicated servicing area accessed, as existing, from Yeo Street. The development would be 'car-free' with the exception of 4 accessible parking bays.
- 2.6 The building would provide private amenity space in the form of balconies for all residential units. It would also provide 686sqm of communal amenity space and 484sqm of child play space on site.

3. RELEVANT PLANNING HISTORY

Application Site:

- 3.1 PF/18/00196 – Case closed Dec '19. Pre application for the demolition of the existing building and the erection of a new building to provide a mixed use residential and commercial development.
- 3.2 PA/11/00432 – Application refused on 27/04/2011 in relation to a lawful development certificate for existing use as education/training office and College premises (Unit 6).
- 3.3 PA/10/01369 – Planning Permission refused on 04/05/2011 for - Change of use of first floor from Class B1 offices to Class D1 educational facility (Unit 6).
- 3.4 PA/05/01226 – Planning Permission refused on 25/07/2006 for - Change of use from office (B1) to banqueting hall (D1) at first floor level (Units 2 and 3).
- 3.5 PA/05/00913 – Planning Permission granted on 23/05/2005 for - Construction of three storey building comprising new offices (B1 Use) with four car parking spaces at ground floor level.
- 3.6 PA/05/00910 – Planning Permission granted on 24/08/2005 for - Construction of single storey roof extension at 2nd floor level to accommodate new offices (B1 Use) (Units 2 and 3).

Neighbouring Sites:

- 3.7 Caspian Wharf: PA/05/01647 – Planning Permission granted on 03/05/2007 for - Redevelopment of site to provide buildings of between 4 & 9 storeys and of 13 storeys for mixed use purposes including 390 residential units, Class A1, A2, A3, B1 and D2 uses with associated car and cycle parking, roof terraces, landscaping, canalside walkway and servicing.
- 3.8 Watts Grove Depot: PA/14/02585 – Planning Permission granted on 24/12/2014 for - Complete redevelopment consisting of the demolition of all buildings and structures on the depot site and associated areas of hardstanding to provide 148 new homes (flats and houses) in buildings of varied heights ranging from three storeys to seven storeys (Use Class C3) together with new and upgraded vehicular access, new pedestrian accesses, open space, landscaping and associated works including relocation of existing telecommunications mast.

4. PUBLICITY AND ENGAGEMENT

- 4.1 Upon validation of the application, the Council sent consultation letters to 275 nearby owners and occupiers on 6th December 2019. A total of four letters were received.
- 4.2 One letter of support was received.
- 4.3 Three letters objecting to the proposal were received. The comments raised in the objections can be summarised as follows:
- Daylight/Sunlight and Overshadowing Impacts;
 - Lack of consultation and community engagement;
 - Visual Impacts caused by the proposed height of the development;
 - Amenity concerns including impacts on privacy, overlooking, sense of enclosure, noise
 - Possible anti-social behaviour towards the Limehouse Cut Canal;
 - The proposal presents an overdevelopment of the site;
 - Impacts during the construction phase of the development including heavy traffic and increased pollution.
 - The development would have an impact on the local amenities in the area.
- 4.4 As detailed within the submitted Statement of Community Involvement (SCI), the applicant engaged with local residents with regards to the scheme by way of letter, to properties within a pre-defined area and by way of a public 'consultation session' for local residents on 7th October 2019. This consultation is satisfactory and complements the obligatory statutory notification undertaken by the Council.
- 4.5 The scheme has been developed in light of extensive pre-application discussions held with officers at LBTH since early 2018.

5. CONSULTATION RESPONSES

Internal consultees

LBTH Transportation and Highways:

- 5.1 No objection to the proposal subject to conditions to secure the provision of a car free agreement, a Parking Management Plan, cycle facilities, a Travel Plan, a S278 Agreement for highways improvements works and a Demolition and Construction Management Plan.

LBTH Affordable Housing:

- 5.2 The proposal meets Council's policy to provide 35% affordable housing with a tenure split of 71% affordable rented and 29% intermediate units. The Council's unit mix policy is broadly met and is supported.

LBTH Occupational Therapy:

- 5.3 No objections to the proposal.

LBTH Waste Policy and Development:

- 5.4 No objection in principle to the proposed waste storage and servicing strategy, subject to the submission of details.

LBTH Environmental Health (Odour/Pollution):

- 5.5 No objection subject to the submission of a Construction Environmental Management Plan (CEMP).

LBTH Environmental Health (Air Quality):

- 5.6 No objection, subject to the submission of details including an assessment of dust impacts during the construction phase.

LBTH Environmental Health (Noise/Vibration):

- 5.7 The submitted noise impact assessment highlights that the impact of the atmospheric plant noise emissions to neighbouring residential premises may give rise to adverse effects. No objection subject to the submission of details regarding mitigation and the submission of an additional pre-occupation noise assessment.

LBTH Environmental Health (Contaminated Land):

- 5.8 No objections to the proposal subject to conditions relating to the submission of investigation and risk assessments for the site.

LBTH Biodiversity:

- 5.9 No objections to the proposal. Conditions required in relation to the provision of a minimum 3 bat boxes, the submission of a bat roost survey, vegetation clearance, biodiversity mitigation and enhancement.

LBTH Energy Efficiency:

- 5.10 Energy officers advise that a carbon off-setting contribution of £325,080 will be required to be tied to the legal agreement to offset against the Council's 0% carbon policy. An updated energy statement, post construction energy note including 'as built' calculations and the submission of a final BREEAM Certificate shall be submitted.

LBTH Enterprise & Employment:

- 5.11 Section 106 Agreement to include obligations relating to construction and end-use phase provisions and financial contributions.

External Consultees:

Environment Agency:

- 5.12 No objection to the proposal subject to conditions requiring the submission and implementation of a flood defence strategy.

Canal and River Trust:

- 5.13 No objection to the proposal subject to conditions in relation to landscaping detail, drainage strategy, lighting and a Construction Environmental Management Plan (CEMP).

Thames Water:

- 5.14 No objections to the proposal subject to conditions requiring the submission of a Piling Method Statement and informatives.

TFL – Land Use Planning:

- 5.15 The proposed cycle parking provision meets minimum standards contained within the Draft London Plan. However the proposed provision of one cycle store area within over 150 bicycles should be split to maximise security and convenience. The development should be car-free and the proposed creation of a canal side walk is welcomed and should be secured by the Council.
- 5.16 Conditions should be included on permission requiring the submission of a Parking Management Plan, Delivery & Servicing Plan (DSP), Construction Management and Logistics Plan and the securing of a Work Place and Residential Travel Plan by Section 106 Agreement.

Metropolitan Police (Designing Out Crime):

- 5.17 No objections to the proposal. Conditions required in relation to the Secure by Design compliance and standards.

Historic England (GLAAS):

- 5.18 No objections to the proposal subject to conditions relating to the submission of a Written Scheme of Investigation to identify any potential heritage assets of archaeological interest.

Port of London Authority:

- 5.19 No objections to the proposal.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

Development Plan

- 6.1 Planning decisions must be taken in accordance with relevant policies in the Development Plan, unless there are material considerations which indicate otherwise.

The Development Plan comprises:

- The London Plan (March 2016)
- Tower Hamlets Local Plan 2031 (January 2020)

- 6.2 The key Development Plan policies relevant to the proposal are:

Land Use – LP3.3, LP3.8, LP3.9; TH S.H1, TH D.H7
(housing)

Design – LP7.1, LP7.2, LP7.3, LP7.4, LP7.5, LP7.6; TH S.DH1, TH D.DH2
(layout, townscape, appearance, public realm, safety)

Heritage – LP7.8; TH S.DH3, TH D.DH4
(historic environment)

Housing – LP3.5; TH S.H1, TH D.H2, TH D.H3, TH D.H7
(housing quality)

Amenity – LP7.6; TH D.DH8
(privacy, outlook, daylight and sunlight, noise, construction impacts)

Transport – LP6.9, LP6.10, LP6.13; TH S.TR1, TH D.TR2, TH D.TR3, TH D.TR4
(sustainable transport, highway safety and capacity, car and cycle parking, servicing)

Waste – LP5.17; TH D.MW3
(waste capacity and collection)

Environment – LP5.2, LP5.3, LP5.18, LP7.14, LP7.15, LP7.19; TH S.ES1, TH D.ES2, TH D.ES3, TH D.ES5, TH D.ES7, TH D.ES8, TH D.ES9
(air quality, biodiversity, contaminated land, energy efficiency and sustainability, sustainable drainage)

6.3 The new London Plan is currently in draft form. The weight carried by most emerging policies is substantial. Some policies are subject to Secretary of State Directions made on 13/03/2020 and these policies have only limited or moderate weight. The statutory presumption still applies to the London Plan 2016 up until the moment that the new plan is adopted.

6.4 The key emerging London Plan policies relevant to the determination of this application are:

Land Use – H1, H4, H16 (previously H18), E3
(housing, affordable workspace)

Design – D3, D4, D5, D8, D11
(layout, scale, public realm, safety)

Heritage – HC1
(historic environment)

Housing – H6, D6
(housing quality)

Transport – T5, T6, T6.1, T7
(car and cycle parking, servicing)

Environment
(air quality, biodiversity, energy efficiency and sustainability, sustainable drainage)

Other policies and Guidance

6.5 Other policy and guidance documents relevant to the proposal are:

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- LP Affordable Housing and Viability SPG (2017)
- LP Draft New London Plan (2020)
- LBTH Planning Obligations SPD (2016)
- Limehouse Cut Canal Conservation Area Character Appraisal and Management Guidelines (2007)
- Building Research Establishment (BRE) “Site layout planning for daylight and sunlight: a guide to good practice” (2011)
- GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)

7. PLANNING ASSESSMENT

The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Quality & Standard of Accommodation
- iv. Design
- v. Heritage
- vi. Neighbouring Amenity
- vii. Transport and Servicing
- viii. Environment
- ix. Infrastructure Impact
- x. Planning Benefits
- xi. Equalities and Human Rights

Land Use

- 7.1 London Plan Policy 4.1 promotes the continued development of a strong, sustainable and diverse economy across London.
- 7.2 Policy D.EMP3 states that proposals involving the loss of employment land outside of designated employment areas – such as this site - will be considered on a site by site basis. Specifically, the acceptability of such a proposal will be subject to the submission of either 2 years of marketing evidence, or the submission of information which indicates that the site is unsuitable for its continued employment use due to its condition, or that the benefits of alternative use would outweigh the benefits of employment use.
- 7.3 Policy D.EMP2 states that, for major commercial and mixed-use development schemes, a minimum 10% of new employment floorspace should be provided as affordable workspace.
- 7.4 London Plan Policy 3.3 seeks to ensure the pressing need for more homes in London is recognised by increasing the supply of housing. Policy 3.8 seeks to ensure that new

developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.

- 7.5 Draft London Plan Policy H1 sets out objectives to increase the supply of housing and sets out ten year targets to be achieved and in particular sets out a target of 66,000 new homes for London each year for at least 20 years.
- 7.6 Local Plan policy S.H1 seeks to achieve the housing target of 3,931 new homes per year across the borough. This is proposed to be achieved by ensuring that development does not undermine the supply of self- contained housing – in particularly family homes. Development is expected to contribute towards the creation of mixed and balanced communities.
- 7.7 Turning first to the matter of the business use of the site - the existing building contains 13 separate units which equates to 3,445sqm of business floorspace. The building has been vacant for some time. The following is a breakdown of the last uses on the site :

<u>Use:</u>	<u>Floor Area:</u>
B1(A) Office	987 square metres
B1(C) Light Industrial	985 square metres
B8 Storage	1,473 square metres
<u>Total:</u>	<u>3,445 square metres</u>

- 7.8 The proposed development would contain 2471sqm of B1c (light industrial) floorspace. There would, as such, be a net loss of 974 sqm of business floor space on the site.
- 7.9 The net loss of business floor space must be carefully considered against the suite of policies discussed above. The LPA must have sufficient cause to accept such a loss, both through an examination of the submitted documents and an assessment of the other planning benefits of the scheme.
- 7.10 The application was accompanied by a commercial viability assessment report prepared by Strettons. The report advises that the demand for B1a office uses in this location is very limited – the focus of such demand being in traditional and established office areas.
- 7.11 In addition, the report states that the building on the site is tired, suffers with a lack of inclusive access and provides a poor standard of accommodation which does not meet the needs of contemporary commercial clients.
- 7.12 The report concludes that to reprovide the full quantum of accommodation currently on the site would not be effective, nor viable.
- 7.13 The proposed B1c units, on the contrary, would provide spacious floorplates with flexible accommodation to adapt to, and be suitable for, small and medium sized enterprises. The units would provide inclusive access for users, with an on site wheelchair parking space. Deliveries and servicing would be take place on site. The arrangement of the space would also provide activated street frontages, to the great benefit of the appearance of the building and the provision of passive surveillance.
- 7.14 In addition, the scheme would secure 10% of the floorspace as affordable B1c floorspace, to encourage and meet the needs of local businesses and start- ups. This accommodation

would be secured at an affordable tenancy rate for at least 10 years. This is a key benefit of the scheme that would otherwise not be delivered to the local area if not for the proposed development.

- 7.15 In terms of the alternative, mixed use, there is strong policy support for the proposed residential led nature of the scheme. The development would contribute to the Council's extensive housing objectives which are given great weight, given the targets set by the Mayor of London in the Housing SPG (2016). It should be noted here the whilst historically the land around the Limehouse Cut was industrially important, the area has evolved over time with the changing economic landscape and now comprises mainly of mixed use developments, which make optimal use of the available land.
- 7.16 The application proposes to deliver a scheme that is policy compliant in relation to the provision 35% affordable housing and would provide attractive, newly created public areas. The proposed provision of 92 residential units is well supported by policy at a London and Local level.
- 7.17 Overall, the quality of the new business accommodation and the benefits of the alternative, mixed use, are considered to outweigh the reduction in quantum of business space on the site. The proposal is acceptable in land use terms.

Housing Mix

- 7.18 Pursuant to Policy 3.8 of the London Plan, new residential development should offer genuine housing choice, in particular a range of housing size and type. LBTH Policy D.DH2 seeks to secure a mixture of small and large housing. Specific guidance is provided on particular housing types and is based on the Council's most up to date Strategic Housing Market Assessment (2017).
- 7.19 The table below details the mix of unit sizes proposed, as they apply to the market, affordable and intermediate tenured residential units:

<u>Unit Type</u>	<u>Desired Market Mix</u>	<u>Proposed Market Mix</u>	<u>Desired Affordable Rent</u>	<u>Proposed Affordable Rent</u>	<u>Desired Intermediate Mix</u>	<u>Proposed Intermediate Mix</u>
1 bed	30%	21 (33%)	25%	5 (25%)	15%	2 (25%)
2 bed	50%	31 (48%)	30%	2 (10%)	40%	3 (37.5%)
3 bed	20%	12 (19%)	30%	8 (40%)	45%	3 (37.5%)
4 bed			15%	5 (25%)		

- 7.20 As per the above table, there is broad compliance with the policy desired unit mix for market tenured units, however there are inconsistencies within the proposed affordable rent and intermediate tenured units when referenced against policy guidance.
- 7.21 For proposed affordable rented units, there would be an under provision of 2 bed units with an overprovision of 3 and 4 bed units. For intermediate units, there would be an overprovision of 1 bed units with slight under provision for 2 and 3 bed+ units.
- 7.22 Whilst the proposed unit mix for affordable rent and intermediate residential units would not strictly meet policy guidance, there would be an overall above standard provision of larger, family sized units (3 bed+), particularly within the affordable rented offer. Family sized units are in high demand and there is an identified need within the Borough. The non-compliances

reflected in the overall unit mix offer would therefore be acceptable. Council's Housing Team have reviewed the proposal and confirmed that the proposed unit mix across each tenure would be appropriate and have supported the development.

Affordable Housing

- 7.23 The Mayors strategic target is for 50% of all new homes to be genuinely affordable. To contribute towards this aim, policy H4 requires that major housing developments provide affordable housing, using the 'threshold' approach.
- 7.24 The threshold approach sets a benchmark level of affordable housing to be provided on residential development – at 35% of the total housing provision. Where developments meet this threshold and where additionally the offer is consistent with a 70% affordable rented / 30% intermediate tenure split, the application can follow the 'fast track' route and a Viability Assessment need not be submitted. If the above criteria are not met, the application must follow the 'viability tested' route, and submit a Viability Assessment for scrutiny.
- 7.25 It should be noted that, in addition to the 35% target set for the majority of housing schemes, in recognition of the potentially significant difference in residential land values compared to industrial land values, the Mayor expects that residential proposals on industrial land deliver 50% affordable housing, where there would be a net loss of industrial capacity. The proposal under consideration here would not result in a net loss of industrial floorspace or floorspace capacity.
- 7.26 The application would provide 35% affordable housing, with a 71% affordable rented/ 29% intermediate, split. The 1% divergence in relation to the tenure split is not considered material in this instance and the scheme is eligible for the 'fast track' route. To ensure the applicant intends to fully build out the permission, the requirement for an early stage review will be triggered if an agreed level of progress on implementation is not made within 2 years of the permission being issued.
- 7.27 In regards to affordable rented units, a 50/50 product split would be provided between the London Affordable Rent and the Tower Hamlets Living Rent products, in line with the Council's Local Plan. This would ensure an appropriate provision is made to support the need for housing amongst local residents with various options made available as part of the development.

Standard of Residential Accommodation

- 7.28 GLA's Housing SPG aims to ensure that housing is "*fit for purpose in the long term, comfortable, safe, accessible, environmentally sustainable and spacious enough to accommodate the changing needs of occupants throughout their lifetime*". The document provides advice on a number of aspects including the design of open space, approaches to dwellings, circulation spaces, internal space standards and layouts, the need for sufficient privacy and dual aspect units.
- 7.29 Policy D.H3 of the Tower Hamlets Local Plan requires that new dwellings meet the minimum standards prescribed within the London Plan, with particular regard for 2.5m minimum floor to ceiling heights and the provision of 10% wheelchair housing. The policy also highlights the requirement that affordable housing not be of a distinguishable difference in quality.
- 7.30 The 92 residential units would be located at first floor and above. Each unit would meet or exceed minimum space standards and all units would have outdoor private amenity areas in compliance with relevant standards.
- 7.31 10 units (10.8%) would be wheelchair adaptable, in accordance with Part M 4(3) of the Building Regulations. Eight of these units would be made available for residents of the 3 bed,

5 person affordable rented units, which addresses demand and need. The remaining 82 units (89%) would be accessible and adaptable units in accordance with Part M 4(2) of the Building Regulations.

- 7.32 The Market core and Affordable cores would be accessed from the western 'promenade', via separate entrances. The cores would provide separate access to bin and cycle stores on the ground floor of the building. Each core would be provided with two lifts, ensuring adequate ability to access units located above.
- 7.33 Most floors contain both market and affordable units. Gates would be provided at relevant points on each floor to restrict access between cores. The gates would still allow emergency access and an escape route to the nearest stair core.
- 7.34 Whilst it is acknowledged that policy guides developments to provide mixed and balanced communities, the split arrangement would ensure that the management of the affordable rented units is effective. It would ensure that service charge remains at an affordable rate. This advice has been provided by numerous registered providers and is the predominant approach for major residential schemes within the Borough.
- 7.35 The 'Standards for new Homes' document (2017) was produced jointly by the Housing Forum and Tower Hamlets council. It sets standards for the design and finish of affordable new homes – in relation to internal and external communal areas, the internals of the flats themselves and the appearance of the exterior of the building. The developer will commit to implement the development in accordance with the guidance in that document, to ensure a consistency of quality and durability of finish to affordable and market elements of the scheme alike, to ensure the development is 'tenure blind'.
- 7.36 Units would be dual aspect as a minimum, with secondary windows facing inwards, towards the centre of the building. This would allow passive surveillance inwards towards the communal amenity spaces and decked areas.
- 7.37 Separate kitchen and living areas would be provided for all 3 bed and 4 bed affordable rented units. This has been provided on the advice from Council's Housing and Occupational Therapy Teams. This is based on feedback from existing tenants where the separately provided rooms would provide greater levels of liveability and usability.

Communal Amenity Areas & Child Play Space

- 7.38 In a built up area like London, safe communal areas and stimulating play facilities are essential for a person's well-being.
- 7.39 In relation to communal amenity space, Local Plan Policy D.H3 requires the provision of a minimum 50sqm for the first 10 units of a development and a further 1sqm for every additional unit. With the proposed 92 residential units, this equates to a minimum provision requirement of 132 square metres across the development.
- 7.40 The proposal would provide 3 communal amenity spaces, with a total combined area of 686sqm. These areas would be in the following locations :
 - 4th floor – 216sqm 'explorers play'
 - 6th floor – 242sqm 'dwell and belvedere'
 - 8th floor – 234sqm 'exercise area'
- 7.41 As per the above table, the overall provision of 686sqm of communal amenity space would significantly exceed minimum policy requirements. The design of the building has allowed for the overprovision of communal amenity areas and the approach is welcomed.

- 7.42 Local Plan Policy D.H3 requires major developments to provide a minimum of 10sqm of high quality play space for each child, calculated using the anticipated 'child yield' calculator.
- 7.43 The market tenured units would generate a child yield of 11 total children, which requires a minimum 110sqm of play space. The affordable and intermediate tenured units would generate a child yield of 35, which requires a minimum 350sqm of play space, split across the different age groups, as set out in the GLA's Play and Informal Recreation SPG (2012).
- 7.44 The proposal would provide play space in the following 2 locations:
- 1st floor – 456sqm
 - 7th floor – 120sqm
- 7.45 Residents from both the market and affordable/intermediate tenured units would have shared access to all play and amenity spaces within the development. A condition would be applied to the development to allow this to occur.
- 7.46 Indicative landscape drawings have been provided which provides preliminary detail on the layout of communal and child play space areas. The spaces would be well overlooked with a good level of passive surveillance. Whilst the quantum of space provided is welcomed, few details have been submitted with regards to the play equipment specifications, boundary treatment and demonstration that the design of the space meets Play England's design principles. These elements will be secured by condition on consent.
- 7.47 It is noted that some off-site play facilities would provide additional facilities for future residents. Furze Green and Langdon park, within 400m of the development, would provide informal recreation areas, sufficiently extensive green spaces and more formal play.

Daylight and Sunlight for the new residential dwelling

- 7.48 Policy D.DH8 requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments. Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011). The primary method of assessment of new build accommodation is through calculating the average daylight factor (ADF). BRE guidance specifies the target levels of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.
- 7.49 Further guidance is provided with regard to sunlight, with the BRE guidance stating that in general, a dwelling which has a particular requirement for sunlight will appear reasonable sunlight if at least one main window faces within 90 degrees due south and the centre of one window to a main living room can receive 25% annual probably sunlight hours (APSH), including at least 5% annual probably sunlight hours in the winter months (WPSH) between 21 Sept and 21 March
- 7.50 The applicant has provided a Daylight / Sunlight assessment, undertaken by Robinsons surveyors.
- 7.51 In relation to daylight, the ADF was used, which is a measure of the amount of daylight in an interior and is dependent on the room and window dimensions, the reflectance of the interior surfaces and the type of glass, together with any obstructions outside.
- 7.52 The submitted results indicate that 98% of habitable rooms would meet or exceed the relevant ADF value. Each of the 7 shortfalls would occur to bedrooms which the BRE guidance

advises have lesser requirement for daylight than main living spaces. Overall, the proposed accommodation would provide good access to daylight for the future residents.

- 7.53 In relation to sunlight, the BRE guidance uses the Annual Probable Sunlight hours (APSH) that windows facing within 90 degrees of due south should receive. Windows that aren't within the aforementioned parameters are not assessed in relation to sunlight. The guidance recommends that relevant windows should receive at least 25% of the total available sunlight, including at least 5% during winter periods.
- 7.54 The submitted results demonstrate that 71% of rooms would meet or exceed the annual and winter sunlight hours target. Given the developments urban setting, this level of compliance would, overall, provide residents with good access to sunlight.
- 7.55 It is noted that at the time of writing this report, the Anchor Wharf site has yet to apply for planning permission and has not been included in the testing. It is considered that the impacts of any forthcoming Anchor Wharf development will be addressed within that application and as it does not presently have consented or a fixed building envelope, it would not be necessary for the submitted report to consider it.

Design

Planning Policy

- 7.56 The Development Plan policies requires that schemes of high quality design that reflects local context and character and provides attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.
- 7.57 Chapter 7 of the London Plan sets out a range of policies seeking to ensure high quality living spaces. More specifically, policy 7.6 of the London Plan sets out that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. The highest quality materials and design should be incorporated.
- 7.58 Chapter 3 of the Draft London Plan similarly sets out policies and guidance on delivering London's growth through the designing of buildings.
- 7.59 Policy S.DH1 of the Local Plan (2020) requires developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. Developments should be of an appropriate scale, height, mass, bulk and form in its site and context.
- 7.60 Policy D.DH2 of the Local Plan (2020) requires development to contribute to improving and enhancing connectivity, permeability and legibility across the borough. Developments should optimise active frontages towards public streets and spaces, provide clear definition of building frontage and massing and allow connection and continuity of pedestrian desire lines at a human scale.
- 7.61 Policy S.DH3 requires that the significance of heritage assets are preserved in any development scheme.

Height, Scale and Massing

- 7.62 The application proposes the construction of a building comprising of a ground and mezzanine floor and between 3 and 8 stories above. The proposal would include landscaped public open space areas, the provision of a public passage to the west of the development, communal amenity space and on-site child play space.
- 7.63 The massing of the proposed development would follow a 'C' shaped form to match and would provide reference to the existing building on site. The shaped massing would also assist in

allowing a terraced, stepped design whereby the mass is brought away from the western, northern and southern ends progressively as the building height increases.

- 7.64 Areas of communal amenity space and child play space would be conveniently placed on the terraced setbacks, allowing the visual form to be broken up and would provide visual relief.



Figure 4 – CGI Visual of Proposed Development from the South-East of the Site.

- 7.65 The Caspian Wharf development immediately to the east rises from 5 stories adjacent to the subject site, to a maximum of 9 storeys on the northern side of Yeo Street, at its intersection with Violet Road. Saints Court and Tallow Court opposite the site, reach a maximum height of 7 storeys. Buildings to the east of Violet Road rise to 14 stories.
- 7.66 Whilst the maximum 9 storey plus mezzanine form would reach a height taller than immediately surrounding buildings, building heights on this section of Yeo Road do vary and there is no strict consistency to building height in the vicinity. In addition, the maximum height of the proposed building is reached only at the sites north western end. The stepped approach to the facades and the angled form of the balconies provide interest and variation in height along the Yeo Road frontage. The building would be 6 stories high above mezzanine level adjoining Caspian Wharf, to more readily reflect the height of this adjoining building. Given the surrounding context and the stepped design approach, it is considered that the size and height of the building is in keeping with the form, rhythm and character of the Yeo Road street scene.
- 7.67 The massing and scale of the development is considered to be proportionate to the context of the surrounding area and would not be out of place in its setting.

Appearance and Layout

- 7.68 In regards to the ground floor layout and visual treatments, the development would contain active frontages to the north towards Yeo Street, to the west towards the newly created public passage and to the south towards the Limehouse Cut.
- 7.69 The building would be setback from Yeo Street to match the existing building line of the eastern adjoining Caspian Wharf development. This would ensure a consistent built form across Yeo Street and would ensure the building would not be visually oppressive to the streetscape.
- 7.70 The opening up of a new north-south link between Yeo Street and the Canal would be a positive addition to the local area and would respond appropriately to the significance of the Canal. This would be further enhanced with a 7 metre building setback from the Canal which would provide an additional public realm area. Both proposed public realm areas would be secured through a Section 106 Agreement.



Figure 5 – North-South Pedestrian/Cycle Link

Materials

- 7.71 The suite of materials used throughout the building include dark tone face brickwork which would be used as the predominant base material along each elevation. From the third storey and above, the building would comprise angled balconies with dark tone steel balustrades and red zinc cladding.

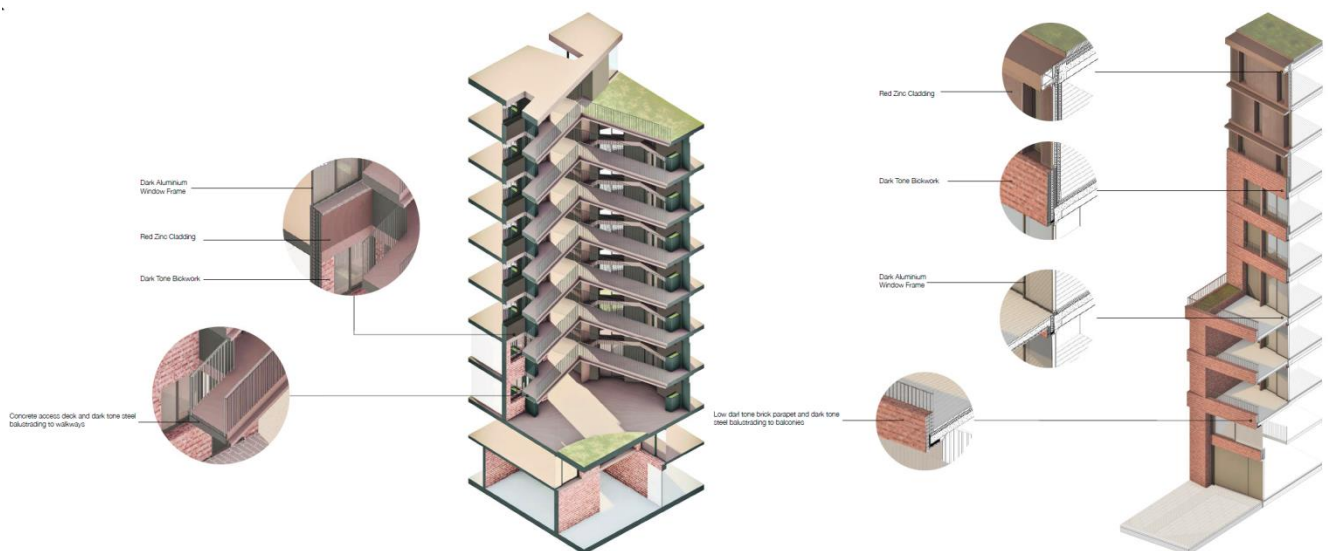


Figure 6 – Proposed Materials and Finishes

- 7.72 Towards the west and south (Limehouse Cut), recessed and angled balconies would be utilised behind the brick base. Upper levels of the building would include both red zinc cladding and anodized aluminium panels. Unit windows would be framed with a dark aluminium material whilst balcony treatments would comprise dark tone brick parapets with dark tone steel balustrades.
- 7.73 The suite of proposed materials would appropriately provide reference to the past industrial use of the site and surrounding area whilst still being of high quality. The materials and overall appearance of the building would be consistent with guidance within the Development Plan.

Landscaping

- 7.74 Preliminary landscape drawings have been submitted to support the application and feature elements within the development as well as within the proposed public realm areas.
- 7.75 Hard landscaping features include sporting/gym equipment, lounge and bench structures, planters, play equipment, bbqs, decked and turfed areas spread across the building's shared amenity areas and roof. Hard landscaping within the public realm areas to the west and south of the site include high quality paving materials and seating.
- 7.76 Large areas of plantings with a mix of native trees and plants are proposed across the development. The soft landscaping strategy would be in keeping with the Council's Biodiversity Strategy.
- 7.77 The submitted approach is supported and would ensure a high quality design response that would create attractive areas of public open space. The further development of the finalised landscaped design will be required as part of further planning conditions.

Conclusion

- 7.78 In terms of overall design, the development is well considered, appropriately detailed and would allow a building of suitable mass and scale for the site's location.
- 7.79 Whilst being higher than immediately surrounding developments, the additional height would be concentrated to the western side of the site and would step down to the south and east. The overall design of the building with communal amenity and child play space terraces and permeable design would provide sufficient visual relief.

- 7.80 The provision of three active frontages is consistent with policy guidance to make use of areas open and visible to the public and would add visual interest from Yeo Street and from the Limehouse Cut.
- 7.81 The suite of materials and the contemporary design ensure there is suitable reference to the past history of the surrounding area, whilst also ensuring a high quality, modern design approach. The design of the building effectively meets Development Plan policy considerations and would make a positive contribution in the surrounds.

Heritage

- 7.82 Development Plan policies require development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Local Plan Policy S.DH3 requires development to protect and enhance the borough's conservation areas including their setting.
- 7.83 Whilst the site is not located within a conservation area nor does it include any locally or statutorily listed building within its curtilage, the site is bounded by the Limehouse Cut Conservation Area to its immediate south.

Surrounding Conservation Areas

- 7.84 As previously raised, the Limehouse Cut Conservation Area's location to the immediate south of the subject site requires the development to protect and enhance the setting if this area.



Figure 7 – Limehouse Cut Conservation Area

- 7.85 The Conservation area covers the length of the Canal with development policies and guidance contained within the Limehouse Cut Conservation Area Character Appraisal and Management Guidelines. This document seeks to ensure a positive relationship between the buildings adjacent to the canal. The guidelines also seek to ensure the height and location of new buildings are carefully considered and highlights the importance of increased access to and from the canal.

- 7.86 The appearance of the building on its southern, canal side is an important consideration. The building will be highly visible from the canal itself and from the south bank and tow path, which form part of the conservation area. The building would step down to 3 stories above mezzanine level on its southern elevation, with generous set backs from the canal edge. The building would confirm to the building line on this elevation and views of it would be enhanced with the development in place, through the introduction of public landscaped space. Views of the building from both the east and west of the site from the canal and its south bank would preserve the special character of the conservation area.
- 7.87 The proposed development would be setback approximately 7 metres from the Canal and seeks to create a pedestrian and cycle link from Yeo Street through to the Canal to the west of the site.
- 7.88 To open up canal-side opportunities and ensure a positive visual relationship with the canal, the southern façade of the building at ground level would be occupied with a commercial unit with an active frontage. Preliminary landscaping detail has been submitted which shows a combination of both hard and soft landscaping treatments which would further enhance this setting. The development's numerous interactive relationships with the Canal will ensure active use of this area.
- 7.89 The mass of the 6th, 7th and 8th storey above mezzanine level is also minimal with generous recesses and setbacks from the lower levels of the building. The tapering and recessed building form would ensure than acceptable visual impact on the Canal and its setting.
- 7.90 The site does not accommodate any statutory listed buildings, but there are a number situated within the local area; however the application is not considered to affect their setting given the context of the surrounding development area and the overall height and scale of the proposed building being general in line with surrounding structures.

Conclusion

- 7.91 The proposed development would not harm the character or appearance of the Limehouse Cut Canal Conservation area and would enhance the overall setting of the area. One of the key features of the proposed development is it's physical and visual connection with the Limehouse Cut. The design approach pursued as part of the development is well considered and effectively responds to the significance of the conservation area. The proposal would increase waterfront activity and would ensure a positive relationship.

Neighbouring Residential Amenity

- 7.91 Development Plan policies seek to protect neighbour amenity safeguarding privacy, not creating or allowing unacceptable levels of noise and ensuring acceptable daylight and sunlight conditions.

Daylight and Sunlight

- 7.92 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).
- 7.93 A number of residential properties surround the site. These properties have been tested in relation to Daylight, Sunlight and overshadowing impacts and the results recorded in the submitted Daylight Sunlight Report conducted by Robinsons. This report has been independently reviewed on behalf of the Council by Delva Patman Radler.
- 7.94 For calculating daylight to neighbouring residential properties affected by the proposed development, the primary assessment is the vertical sky component (VSC) together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be

assumed. These tests measure whether buildings maintain most of the daylight they currently receive.

- 7.95 BRE guidance in relation to VSC requires an assessment of the amount of daylight striking the face of a window. The VSC should be at least 27%, or should not be reduced by more than 20% of the former value, to ensure sufficient light is still reaching windows. VSC is a metric that determines the amount of light falling on a particular point, in this case, on the centre point of the window. The calculations for VSC do not take into account window size, room dimensions or the properties of the window itself.
- 7.96 The NSL calculation takes into account the distribution of daylight within the room, and again, figures should not exhibit a reduction beyond 20% of the former value. NSL assesses where daylight falls within the room at the working plane (850mm above floor level in houses), Daylight distribution assessment is only recommended by the BRE Report where room layouts are known.
- 7.97 The technical analysis within the applicant's report demonstrates that 15 residential properties were assessed. These properties include David Hewitt House, Saints Court, Tallow Court, 1-82 Caspian Wharf, 10-17 Ballardier Walk, 83 Barchester Street, Watts Grove. A summary of results for each assessed property will be contained below in this report.

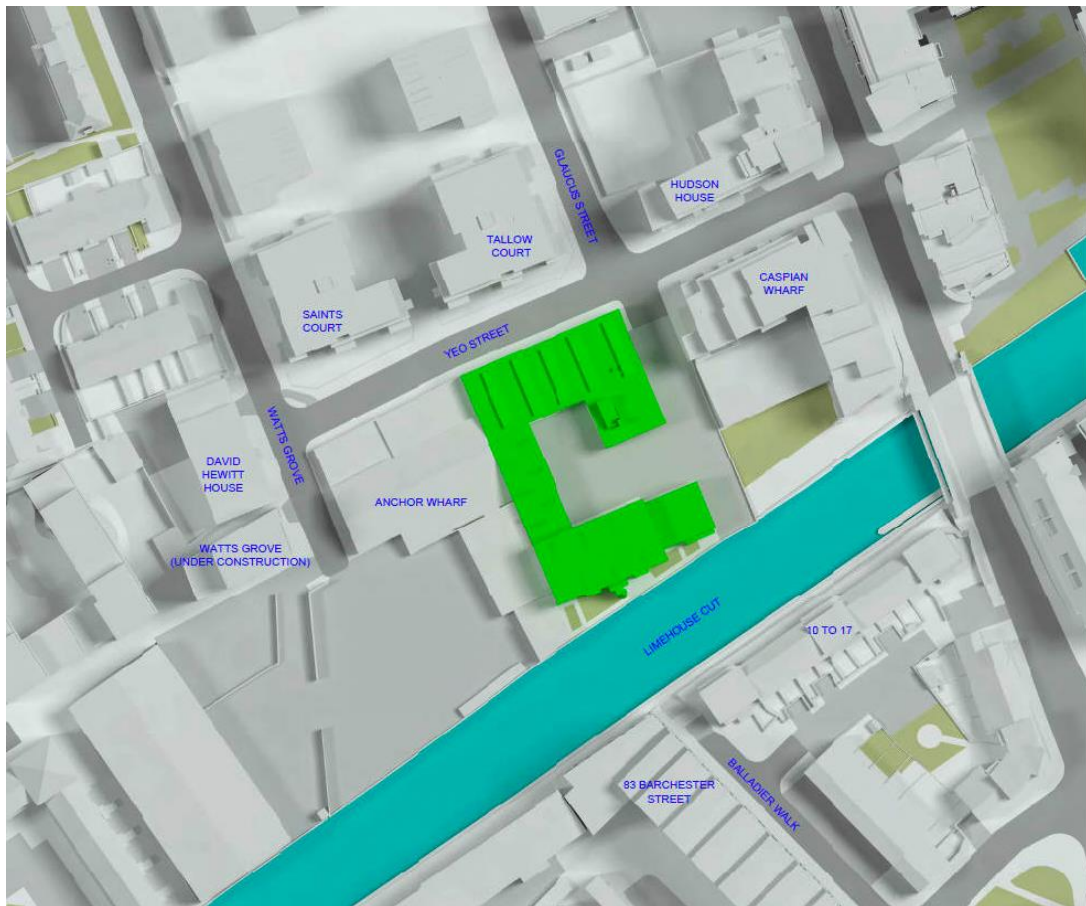


Figure 8 – Subject Site and Surrounding Developments

- 7.98 There is no definitive categorisation for impacts that exceed BRE guidelines, however the following significance criteria banding was used when summarising the overall daylight and sunlight effects to the surrounding buildings;
- Negligible; 0-20% loss against existing
 - Minor adverse; 20-30% loss against existing

- Moderate adverse; 30-40% loss against existing
- Major adverse; >40% loss against existing

David Hewitt House

- 7.99 The David Hewitt House Development is located on the western side of Watts Grove, to the west of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.100 The submitted assessment demonstrates that the proposed development would not negatively impact the daylighting and sunlighting conditions within this building and would be BRE complaint in relation to relevant tests.

Saints Court

- 7.101 The Saints Court Development is a seven storey block of units located on the northern side of Yeo Street, to the north-west of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.102 The submitted results show that 90 out of 106 (84.9%) windows would be compliant with VSC targets. Of the 16 windows where there would be a VSC reduction of greater than 20%, 13 would be within the 20-30% range in regards to VSC loss against existing conditions meaning a minor adverse impact on these windows. 1 window would suffer a loss between 30-40% meaning a moderate adverse impact on this window. 2 windows would suffer a loss greater than 40%, meaning a major adverse impact on these windows.
- 7.103 All relevant rooms within the Saints Court Development would be compliant with NSL and APSH targets.

Tallow Court

- 7.104 The Tallow Court Development 7 storey block of flats and is located on the northern side of Yeo Street, to the north of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.105 Of the 71 rooms assessed for VSC, 45 (63%) would not meet the BRE guidelines. Of those that fall below, 6 would experience a minor adverse impact, 14 would experience a moderate adverse impact and 25 would experience a major adverse impact. There would be 36 shortfalls in regards to the daylight distribution (NSL) to 71 existing rooms. 4 of the shortfalls would be minor adverse, 5 would be moderate adverse, whilst 25 would be major adverse. The additional 'without balconies' assessment however does show an overall improvement in results. The BRE guide notes that in such cases, the presence the balcony rather than the size of the obstruction may be the main factor in the relative loss of light.
- 7.106 The submitted APSH results demonstrate that 13 rooms would fall below the guidelines. There would be 6 transgressions in annual sunlight and 9 transgressions in winter sunlight. 2 bedrooms would experience transgressions in both annual and winter sunlight. Where the sunlight criteria is not met the rooms are served by either balconies or are located on the recessed façade hinders the access of sunlight.
- 7.107 The impacts of the proposed development on daylight conditions to Tallow Court are considered to be major adverse, whilst impact on sunlight conditions would be minor adverse.

Hudson House

- 7.108 The Hudson House Development is located on the northern side of Yeo Street, to the north-east of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.109 Of the 61 rooms assessed for VSC, 11 (18%) would not meet the BRE guidelines. Of those that fall below, 5 would experience a minor adverse impact, 5 would experience a moderate adverse impact and 1 would experience a major adverse impact. The additional 'without balconies' assessment shows an overall improvement to the results and a reduction to 5 rooms not meeting the BRE guidelines for VSC. This demonstrates that the existence of balconies to the Hudson House development is a contributing factor to the loss of daylight and would exacerbate the proposed development's impacts.
- 7.110 In regards to NSL results, 59 out of 61 rooms (96%) tested would receive adequate daylight distribution in line with BRE guidance. 1 room would have a minor adverse reduction whilst 1 room would have a moderate adverse reduction in daylight distribution.
- 7.111 The submitted APSH results demonstrate that 8 rooms would fall below the BRE guidance. There would be 3 transgressions in annual sunlight and 8 transgressions in winter sunlight. 3 rooms would experience transgressions in both annual and winter sunlight. Of the 8 rooms, 7 are located on the first floor and 1 on the second floor.
- 7.112 The overall impact of the proposed development on daylight and sunlight conditions to Hudson House is considered to be minor to moderate adverse.

Caspian Wharf

- 7.113 The Caspian Wharf Development is located on the northern side of Yeo Street, to the east of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.114 Of the 76 rooms assessed for VSC, 17 (22%) would not meet the BRE guidelines. Of those that fall below, 15 would experience a minor adverse impact, 1 would experience a moderate adverse impact and 1 would experience a major adverse impact. The additional 'without balconies' assessment shows an overall improvement to the results and a reduction to 4 rooms that would not meet the BRE guidelines for VSC. This demonstrates that the existing balconies are a contributing factor to the loss of daylight.
- 7.115 In regards to NSL results, 9 rooms (12%) would not meet the BRE guidelines. Of those that fall below, 2 would experience a minor adverse impact, 4 would experience a moderate adverse impact and 3 would experience a major adverse impact.
- 7.116 The submitted APSH results demonstrate that all relevant rooms would meet the BRE recommended annual APSH whilst just one bedroom would experience a transgression in winter sunlight.
- 7.117 The overall impact of the proposed development on daylight and sunlight conditions to Caspian Wharf is considered to be minor adverse.

10 11 Balladier Walk

- 7.118 The residential properties at 10 & 11 Balladier Walk are located on the south side of the Limehouse Cut, to the south of the Proposed Development. The applicant's Daylight and Sunlight report states that the internal arrangements have been based on reasonable assumptions as the applicant has not been able to source precise layout information. The

assumed layouts have been reviewed by the Council's consultant who is satisfied that the layouts are reasonable.

- 7.119 The submitted results demonstrate that both properties would fully comply with the BRE guidelines in relation to BSC and APSH.
- 7.120 There would however be 9 shortfalls in regards to the daylight distribution (NSL) to existing rooms. 3 of the shortfalls would be minor adverse, 4 would be moderate adverse whilst 2 would be major adverse.

12-17 Ballardier Walk

- 7.121 The residential properties at 12-17 Ballardier Walk are located adjacent to 10 & 11 Ballardier Walk to the south side of the Limehouse Cut. The applicant's Daylight and Sunlight report states that the internal arrangements have been based on reasonable assumptions as the applicant has not been able to source precise layout information. The assumed layouts have been reviewed by the Council's consultant who is satisfied that the layouts are reasonable.
- 7.122 The submitted assessment demonstrates that the proposed development would have only a minor impact the daylighting and sunlighting conditions within this building and would be predominantly BRE compliant in relation to relevant tests.

83 Barchester Street

- 7.123 The 83 Barchester Street Development is currently under construction and is a residential development located to the south of the Proposed Development, facing north over the Limehouse Cut. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.124 47 out of 51 (92%) windows tested would comply with VSC targets whilst there would be 2 windows which would not comply. 3 of the windows would be of minor adverse impact whilst 1 of the windows would incur a moderate adverse impact.
- 7.125 All relevant rooms within the 83 Barchester Street Development would be compliant with NSL and only minor discrepancies with APSH targets.

Watts Grove

- 7.126 The Watts Grove Development is located on the southern side of Yeo Street, to the west of the Proposed Development. Layout plans for the approved scheme obtained from the Council's Public Planning Register have been used and incorporated into the submitted model.
- 7.127 32 out of 36 (88%) windows tested would comply with VSC targets whilst there would be 4 windows which would not comply. 3 of the windows would be of minor adverse impact whilst 1 of the windows would incur a moderate adverse impact.
- 7.128 All relevant rooms within the Watts Grove Development would be compliant with NSL targets. There would be only minor discrepancies with APSH Targets.

Overshadowing

- 7.129 In relation to the potential overshadowing of gardens and open spaces, BRE guidance sets out that the centre of an existing area should receive at least two hours of sunlight on the 21st. The proposed development would not have significant overshadowing impacts on neighbouring amenity areas.

- 7.130 A transient shadow study has been undertaken to assess the impact to neighbouring amenity spaces. With the exception of amenity spaces at Hudson House, the results demonstrate that amenity spaces on neighbouring developments would be adequately sunlit for at least 2 hours a day on the 21st of March and would meet BRE Guidance.
- 7.131 The results demonstrate however that the amenity spaces located at Hudson House would not retain a minimum of two hours sunlight and there would be a reduction specifically between 11am to 3pm. This impact would be moderate adverse.

Conclusions on Daylight, Sunlight and Overshadowing

- 7.132 In summary, the results in relation to daylight, sunlight and overshadowing demonstrate that the majority of the surrounding properties will not be adversely affected by the proposed development. There are however a number of habitable rooms within residential dwellings, particularly at Tallow Court that will experience noticeable reductions in the daylight and sunlight levels as specified in detail above. Additionally, there would be moderate adverse impact to the existing amenity spaces located at Hudson House.
- 7.133 Having regard to this, it is noted that Part 1(d) of Policy D.DH8 of The Tower Hamlets Local Plan 2031 (Managing Growth and Sharing the Benefits) requires that new developments should not result in an unacceptable material deterioration of the daylighting conditions of surrounding development including habitable rooms of residential dwellings.
- 7.134 In assessing the proposals against the above policy context, the existing site conditions and location of the proposals are also of relevance. In this regard it should be noted that the application site is developed with a low scaled building and neighbouring sites are developed up to, or in close proximity to the site boundary, with a number of windows orientated towards or receiving daylight from the application site. It is therefore considered that any substantial above ground development on the application site would result in daylight and sunlight implications to surrounding properties.
- 7.135 It is also noted from the submitted assessment that contributing factors including existing balconies and the proximity of windows located on site boundaries plays a significant role in the impacts of the proposed development on surrounding properties. It is also acknowledged that daylight and sunlight levels for buildings within an urban context are more likely to incur shortfalls.
- 7.136 Further to the above, it is noted that planning policies promote optimisation of underutilised sites and a variety of land uses. When taken in the context of the transgressions from BRE guidance, the wider benefits of the proposed development and the existing site conditions, it is considered that the proposed development would not result in an unacceptable impact on daylighting or sunlighting conditions to surrounding properties.

Overlooking

- 7.137 Local Plan policy D.DH8 promotes a distance of 18 metres between windows of habitable rooms to ensure sufficient privacy and no unreasonable loss of amenity from overlooking between habitable rooms of adjacent residential properties and private amenity areas.
- 7.138 Habitable room windows within the development have been designed to ensure compliance with this policy. To the south, residential units would overlook the Canal and beyond the canal, there would be sufficient separation distances to ensure minimal overlooking impacts.
- 7.139 To the north, there would be sufficient distances provided between the buildings windows and those across Yeo street.

- 7.140 For units to be located along the eastern boundary of the site, there would be no habitable room windows facing east with the exception of the Units R28 and R42 to be located in the south-eastern corner of the second and third floors of the building. These windows however would be translucent, ensuring only obscured views facing this direction.
- 7.141 To the west towards the neighbouring Anchor Wharf development, there is the potential for overlooking impacts if a future development proposal were to be submitted and developed. To safeguard against this, habitable room windows facing west would be setback a minimum of 9 metres from the western boundary. This setback would ensure any future development opportunity on the Anchor Wharf would not be impacted by the proposal and sufficient distances can be provided.
- 7.142 Internal overlooking would be effectively managed. Internal north and south facing residential units would contain windows facing inwards towards the courtyard. There would however be a minimum 19 metre distance between the windows which would ensure minimum standards would be met.
- 7.143 The separation distances internally and with adjacent buildings are considered sufficient to limit the potential for unacceptable levels of overlooking and would not unacceptably impact on neighbouring privacy.

Noise and Vibration

- 7.144 The application is supported by a Noise Assessment. The report demonstrates that the scheme has been designed so that it appropriately responds to the immediate application site context. Subject to conditions requiring plant noise emissions to be below the Council's noise criterion, the completed proposed development would not give rise to significant effects in respect of operational noise and vibration.

Construction Impacts

- 7.145 Demolition and construction activities are likely to cause some additional noise and disturbance, additional traffic generation and dust. In accordance with relevant Development Plan policies, a number of conditions are recommended to minimise these impacts. These will control working hours and require the approval and implementation of Construction Environmental Management and Logistics Plan.

Summary

- 7.146 Overall, the proposed development would not have an unacceptable adverse impact on the surrounding area in terms of daylight or sunlight conditions. The potential for overlooking has been addressed and sufficient distances and measures have been incorporated into the development. Overall there would be compliance with policy D.DH8 which seeks to protect the amenity of existing buildings and their occupants.

Transport

- 7.147 Development Plan policies promote sustainable modes of travel and seek to limit car parking and car use to essential user needs. These policies also seek to secure safe and appropriate servicing arrangements to ensure developments are managed effectively and efficiently.

Car Parking

- 7.148 The applicant has committed to a 'car free' development with the exception of four blue badge bays. The 'car free' nature of the proposal is considered acceptable given the site's access to

surrounding public transport networks and is supported. The provision of the development as 'car free' would need to be secured through a legal agreement. No visitor parking bays have been provided.

- 7.149 A total of 4 accessible 'blue badge' bays are proposed to be provided as part of the development and would be located to the north-east of the site, adjacent to the vehicular access.
- 7.150 3 of the accessible bays would be allocated to the residential units whilst 1 accessible bay would be allocated to the commercial units. The provision of 3 accessible bays is compliant with London Policy which seeks to ensure the on-site provision of at least one designated accessible bay per dwelling for 3% of the dwellings. These bays must be made available at the outset of the development and the proposed scheme is acceptable in this regard.
- 7.151 Notwithstanding the provision of 3 accessible bays for the residential units, there is a requirement to demonstrate that there is future capacity for additional accessible bays either on the site or within the immediate surrounds. This is necessary to ensure that future occupants of the development who may have the need for such bays will be provided with one.
- 7.152 The provision of further accessible bays within the site has been shown to not be possible, however there are opportunities for on-street accessible bays. A drawing has been submitted which demonstrates 6 accessible bays along Yeo Street that could be made available if the demand or need arose.
- 7.153 To further safeguard the ongoing use and further provision of accessible bays, a Parking Management Plan will need to be submitted and will be included as a condition requirement. Heads of Terms have also been agreed which will require the financial contribution of £5000 per accessible bay, which would be returned after three years if no future occupant within the residential units has a requirement for use of an on-street accessible bay. These terms will be included within a Section 106 Agreement.
- 7.154 In relation to the provision of 3 accessible bays for the residential units, rather than being allocated to specific units, these would be managed on a 'right to park' basis whereby bays would be allocated to occupants with the relevant. This arrangement would be managed by the building/on-site management team.

Servicing and Deliveries

- 7.155 The proposed servicing and delivery arrangements would be accessed from Yeo Street, to the north-east of the site. The service area would be located on the ground floor of the building and would cater for both the commercial and residential elements of the scheme. Submitted drawings and details demonstrate that relevant delivery, refuse and service vehicles would adequately manoeuvre in and out of the site.
- 7.156 There is no objection to the proposed arrangements subject to a condition requiring the submission of a Delivery, Servicing and Waste Management Plan

Cycle Parking

- 7.157 The proposed development would generate the following need for cycle parking to be provided in line with the up to date requirements of the Draft London Plan:
- Residential Use: 170 long stay spaces and 3 short stay spaces
 - Commercial Use: 10 long stay spaces and 3 short stay spaces

- 7.158 The proposed Cycle parking spaces for both the residential and commercial units would be located on the ground floor of the building.
- 7.159 Cycle parking spaces for the purpose of residential long stay purposes would be split into three storage areas and would be located adjacent to the two residential cores. Residential short-stay spaces would be located externally towards the western boundary of the building within the proposed new pedestrian and cycle link.
- 7.160 Commercial long stay and short stay spaces to service staff and visitors would be located adjacent to the plant room and would be accessible from Yeo Street.

Trip generation

- 7.161 The submitted Transport Assessment has considered the total trip generation for both the residential and commercial portion of the development.
- 7.162 The assessment concluded that the proposed development has the potential to generate approximately 51 two-way trips during a typical weekday (AM Peak times between 08:00 and 19:00). The majority of these trips would be made via the DLR/Underground/Train services (81%) whilst pedestrian/cycle transport would make up 17%.
- 7.163 For commercial units, the development has the potential to generate approximately 80 two-way trips during a typical weekday AM peak time (between 0800-0900) and approximately 74 during a typical weekday PM peak time (between 1700-1800). Similar to the residential trip generation, the large majority of trips would be made either via public transport options or by cycling/walking.
- 7.164 The submitted servicing trip generation results highlight that for both the residential and commercial elements of the development, a total of 4 servicing trips would be undertaken on a typical day during the AM Peak (0800-0900) and two trips during a typical day's PM peak (1700-1800).
- 7.165 There is no objection to the trip generation details submitted as part of the development and the site and surrounding infrastructure network would sustain the net increase in trips.

Travel Planning

- 7.166 The applicant has submitted a preliminary Travel Plan. No objections were raised to this element by the Council's highways officer. A full travel plan would need to be secured to enforce this.

Demolition and Construction Traffic

- 7.167 Should the application be approved, the impact on the road network from demolition and construction traffic would be controlled by way of conditions requiring the submission and approval of Demolition and Construction Management Plans. The Demolition and Construction Management Plan will need to consider the impact on pedestrians, cyclists and vehicles as well as fully considering the impact on other developments in close proximity.

Environment

Energy Efficiency

- 7.168 At a national level, the National Planning Policy Framework sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and

providing resilience to climate change. The NPPF also notes that planning supports the delivery of renewable and low carbon energy and associated infrastructure. At a strategic level, the climate change policies as set out in Chapter 5 of the London Plan 2015 and the Tower Hamlets Local Plan (D.ES7) collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.

7.169 Policy SI2 of the emerging London Plan requires major development to be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- Use Less Energy (Be Lean);
- Supply Energy Efficiently (Be Clean);
- Use Renewable Energy (Be Green); and
- Monitor and report (Be Seen).

7.170 Policy D.ES7 includes the requirement for non-residential developments to be zero carbon with a minimum of 45% reduction in regulated carbon dioxide on-site with the remaining regulated carbon dioxide emissions to 100% to be offset with cash payment in lieu.

7.171 The submitted Energy Statement (XCO2 – October 2019) sets out the applicant has sought to meet the CO2 emission reduction policy requirements through energy efficiency measures, passive design and use of efficient services (including Air Source Heat Pumps) and on-site renewable energy generating technology (36.1kWp - 190m2 PV array). The report notes that the following CO2 emissions using SAP 2012 carbon factors:

- Baseline – 234.8 tonnes CO2 per annum
- Proposed Scheme – 180.6 tonnes CO2 per annum

7.172 The total on-site site wide CO2 emission reduction is anticipated to be 23.1% against the building regulation (equivalent to 44.4% using SAP10). The SAP10 baseline and proposed scheme have not been provided so the carbon offsetting contribution is calculated on the available SAP 2012 data. This shows the proposals are for a 54.2 tonnes/CO2 reduction in on-site emissions and would result in a carbon offsetting contribution of £325,080 to offset the remaining 180.6 tonnes CO2 and achieve net zero carbon.

7.173 The financial contribution will be included as a planning obligation in the related Section 106 Agreement.

Sustainability

7.174 Policy D.ES7 requires sustainable design assessment tools to be used to ensure the development has maximised use of climate change mitigation measures. This policy requires all non-residential uses which form part of a development to achieve a BREEAM Excellent rating of 70%. The applicant has submitted a BREEAM Pre-Assessment which shows the scheme is designed to achieve a BREEAM Excellent Rating with a score of 73.07%.

7.175 The proposal for the scheme to achieve this BREEAM Excellent rating will be secured via condition.

Summary and Securing the Proposals

7.176 It is considered that the proposals are in accordance with adopted policies for sustainability and Carbon (CO₂) emission reductions and it is recommended they are secured through appropriate conditions to deliver:

- Energy Statement Update to include how energy demand and carbon dioxide emissions post-construction will be monitored annually (for at least five years), proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions by 2050 and an analysis of the expected cost to occupants associated with the proposed energy strategy.
- Submission of a post completion verification report including the as built calculations (SBEM) to demonstrate the reduction in CO₂ emissions have been delivered on-site.
- Submission of a Final BREEM Certificate to demonstrate an 'Excellent' rating has been delivered.

Air Quality

7.177 Development Plan policies require major developments to be accompanied by assessments which demonstrates that the proposed uses are acceptable and show how development would prevent or reduce air pollution.

7.178 The application is accompanied by an Air Quality Assessment. The assessment concludes that the air quality impact from the development will be below the national air quality objective levels. This has been reviewed by Council's Air Quality team and confirmed to be accurate. Conditions would be necessary to limit the impact on local air quality as a result of the construction phase of the development. This would be secured and monitored through a required Construction Management Plan.

Waste

7.179 Development Plan policies require adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements.

7.180 The LBTH Waste Team have reviewed the proposal and are satisfied that subject to securing the details of bin storage size and servicing arrangements by condition, the proposal would be acceptable.

Biodiversity

7.181 Development Plan policies seek to safeguard and provide for net gains for biodiversity. The application site is immediately adjacent to the Limehouse Cut, part of a Site of Metropolitan Importance for Nature Conservation. The application site itself includes small areas of scrub and grassland, which provide some wildlife habitat.

7.182 The submitted Preliminary Ecological Assessment has identified a number of key findings, opportunities and improvements possible for the site. The site itself has not been identified as having existing significant biodiversity value, however its importance given its proximity to the Limehouse Cut is noted. Council's Biodiversity Officer has reviewed the proposal and is satisfied that subject to conditions, the proposal would be acceptable from a biodiversity standpoint.

- 7.183 Biodiversity landscape measures included within the proposal comprise a biodiverse green roof, native trees, dense climbers and nectar rich flowers which are welcomed and would contribute well to the Council's Biodiversity Action Plan objectives.
- 7.184 Further enhancements and net gains on the site would be possible through conditions which would require the provision of a bat roost survey, vegetation clearance, biodiversity mitigation and enhancement would be assessed at condition stage.

Flood Risk & Drainage

- 7.185 Development Plan policies seek to manage flood risk and encourage the use of Sustainable Urban Drainage. The application site is located within Flood Zone 1. The application is supported by a Flood Risk Assessment and a Sustainable Urban Drainage Strategy.
- 7.186 The Environment Agency have reviewed the proposal and are satisfied with the associated flooding risk associated with the development subject to a condition requiring the further submission of survey and detailed design/results. Flooding risk is therefore considered to be acceptable and would be further assessed at condition stage.
- 7.187 The submitted documents demonstrate that there would be no increase in surface water runoff from the development with below ground attenuation storage to significantly reduce outflow against adopted rates and reduce the flood risk and burden on infrastructure. The site adjoins the Limehouse Cut Canal to the south where this would be the ideal location for overflow discharge. Further consultation with Canal and River Trust would be necessary at the detailed design stage. Flooding risk and the urban drainage impacts of the development are acceptable and would be secured via condition.

Land Contamination

- 7.188 The application has been reviewed by the Council's Environmental Health Land Contamination officer and subject to standard conditions, the proposals are acceptable from a land contamination perspective and any contamination that is identified can be satisfactorily dealt with.

Infrastructure Impact

- 7.189 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £150,030.52 and Mayor of London CIL of approximately £273,094.92. It is important to note that these figures are approximate. The final figures will be determined if approval for the application is granted.
- 7.190 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.
- 7.191 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:
- £38,080.00 towards construction phase employment skills training
 - £121,663.89 towards end-user phase employment skills training

Planning Benefits

7.192 The scheme would provide significant public benefits including the provision of 92 residential units and 3 high quality B1(C) commercial units. Other notable benefits anticipated by the applicant include:

- An Employment and Skills Training programme during construction;
- A new north-south pedestrian and cycle link between Yeo Street and the Limehouse Cut;
- A new public realm area along the canalside;
- CIL contributions;
- Significant construction spend in the economy;
- Significant additional visitor spend into the local economy each year;
- Business rate receipts each year for the 3 commercial units;
- A carbon offsetting scheme which exceeds local targets to comply with the emerging 45% carbon emission reduction target in the new development plan.

8. Human Rights & Equalities

- 8.1 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.
- 8.2 The proposed provision of residential units meets inclusive design standards and over 10% of the new rooms would be wheelchair accessible and a total of 4 disabled car parking spaces provided. These standards would benefit future occupants, employees and visitors, including disabled people, elderly people and parents/carers with children.
- 8.3 The proposed development would not result in adverse impacts upon equality or social cohesion.

9 RECOMMENDATION

9.1 That **conditional planning permission is GRANTED** subject to the prior completion of a legal agreement to secure the following planning obligations:

9.2 Financial Obligations

- a. £38,080 towards construction phase employment skills training
- b. £121,683.89 towards end-user phase employment skills training
- c. £325,080 Carbon offsetting obligation

9.3 Non-Financial Obligations

- a. Access to employment
 - 20% local procurement
 - 20% local labour in construction
 - 2 end-user phase apprenticeships
 - 3 construction phase apprenticeships
- b. Transport
 - Approval and implementation of Residential and Workplace Travel Plans
 - Provision of 4 accessible bays
 - Car Free Agreement
- c. Housing
 - 35% affordable housing provision

- d. Workspace
 - 10% affordable workspace
- e. Securing of the two public access areas

10. **PLANNING CONDITIONS**

Compliance

1. 3 years deadline for commencement of development
2. Development in accordance with approved plans
3. Restrictions on demolition and construction activities:
 - a. All works in accordance with Tower Hamlets Code of Construction Practice
 - b. Standard hours of construction and demolition
 - c. Air quality standards for construction machinery
 - d. Ground-borne vibration limits
 - e. Noise pollution limits.
4. Tree Removal Time Periods (Biodiversity)
5. External Lighting

Pre-commencement

6. Piling
7. Energy and efficiency standards
8. Air quality emission standards for boilers & CHP
9. Contaminated Land
10. Archaeological Written Scheme of Investigation
11. Bat Emergence Survey (Biodiversity)
12. Food Defence Strategy
13. Construction Environmental Management Plan and Construction Logistics Plan

Pre- Superstructure Works

14. Details of hard and soft landscaping of all public realm and open spaces including details relating to play equipment, street furniture and lighting, wind mitigation measures, biodiversity mitigation and enhancements
15. Play space details
16. Shopfront and Residential Entrance Details
17. Highway Improvement Works
18. SUDS
19. Secure By Design Standards
20. Details of external facing materials and architectural detailing
21. Biodiversity Mitigation and Enhancements
22. Details of cycle parking

Pre-occupation

- 23. Disabled Car Parking and Parking Management Plan
- 24. Delivery, Servicing and Waste Management Plan
- 25. Details of 10% Accessible Rooms
- 26. Secure by Design Accreditation
- 27. BREEAM Certificate
- 28. Noise Mitigation

Appendix 1 – List of drawings and documents

Drawings:

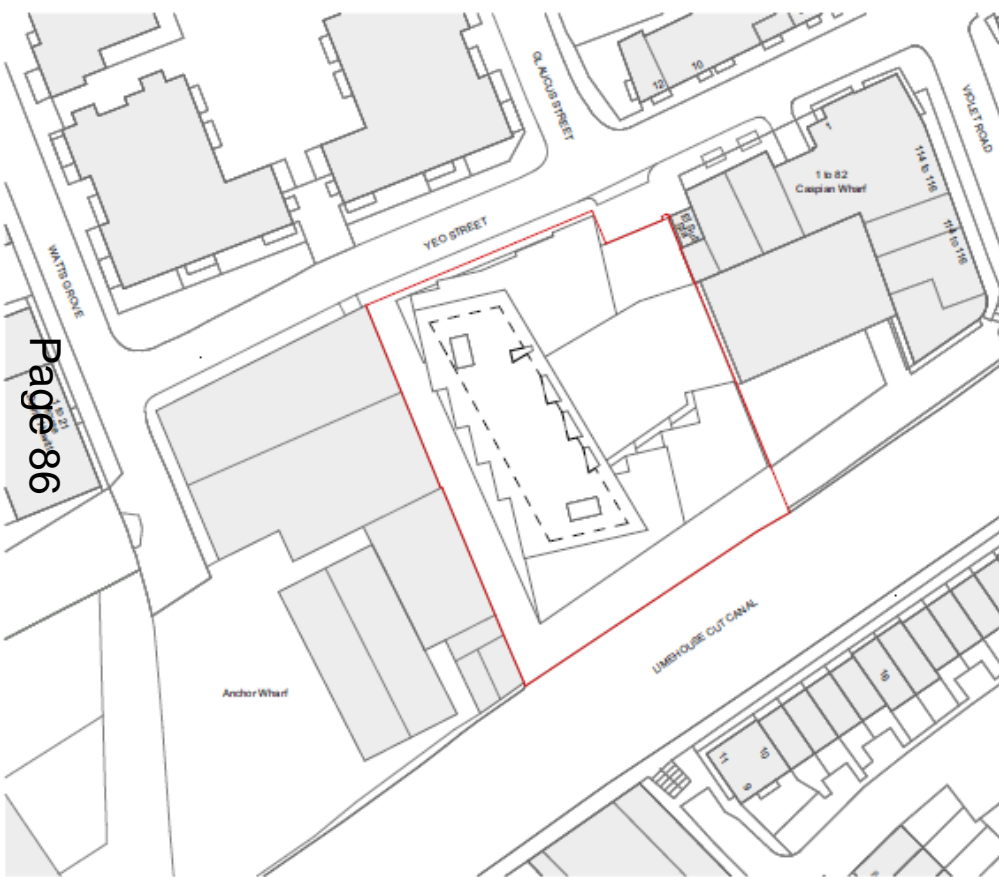
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| – 0855-0020-GA | – 31125/AC/030 | – 0855- 0205 REV A | – 0855-0300 REV A |
| – 0855-0021-GA | – 0855-0100 REV A | – 0855-0205A REV A | – 0855-0301 REV A |
| – 0855-0022-GA | – 0855-0200 REV A | – 0855-0206 REV A | – 0855-0302 REV A |
| – 0855-0023-GA | – 0855-0200A REV A | – 0855- 0206A REV A | – 0855-0303 REV A |
| – 0855-0030-GA | – 0855-0201 REV A | – 0855-0207 REV A | – 0855-0304 REV A |
| – 0855-0031-GA | – 0855-0202 REV A | – 0855- 0207A REV A | – 0855-0400 REV A |
| – BD 0220 SD 801 | – 0855-0202A REV A | – 0855-0208 REV A | – 0855-0401 REV A |
| – BD 0220 SD 802 | – 0855- 0203 REV A | – 0855-0208A REV A | – 0855-0402 REV A |
| – BD 0220 SD 803 | – 0855- 0203A REV A | – 0855-0209 REV A | – 0855-0403 REV A |
| | – 0855-0204 REV A | – 0855- 0209A REV A | |

Documents:

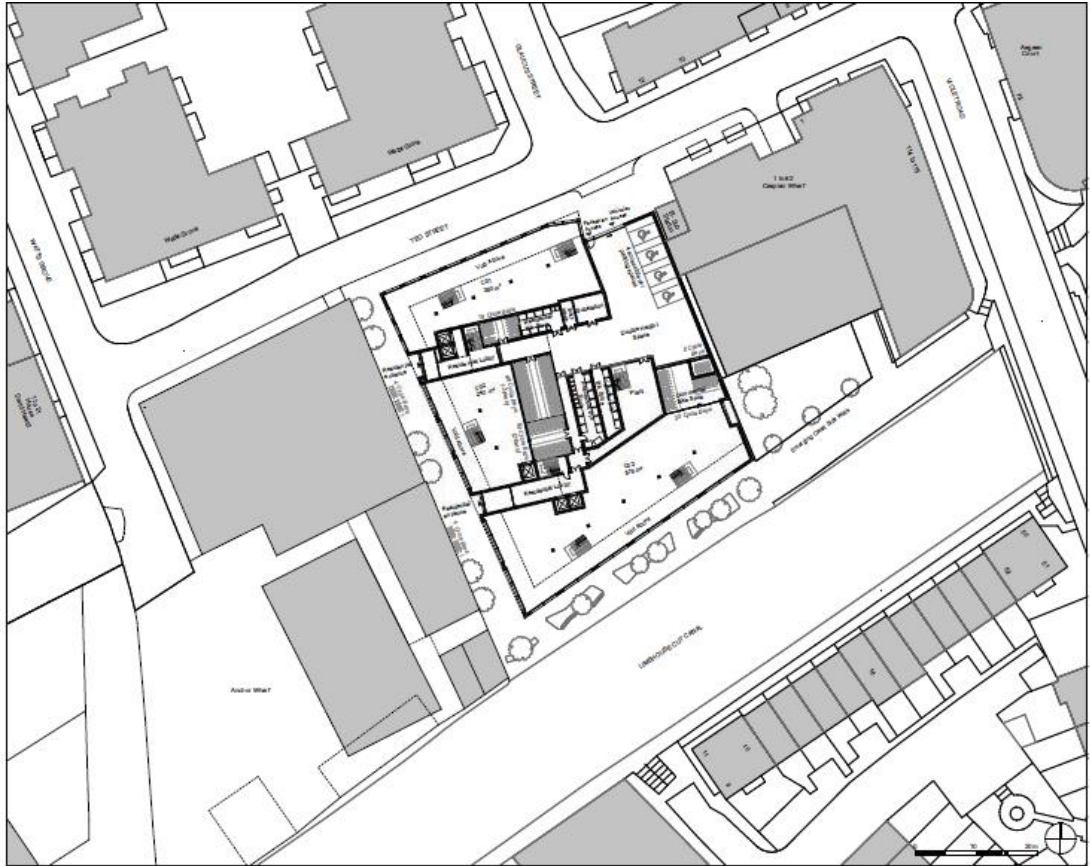
- | | |
|---|---|
| – Design & Access Statement – pH+ Architects (October 2019) | – Outline Delivery & Servicing Plan – Transport Planning Practice (October 2019) |
| – Planning Statement – CMA Planning (October 2019) | – Preliminary Ecological Appraisal – MKA Ecology (October 2019) |
| – Air Quality Statement – XCO2 (October 2019) | – Preliminary Unexploded Ordnance (UXO) Threat Assessment (November 2018) |
| – Energy Statement – XCO2 (October 2019) | – Statement of Community Involvement – Thorncliffe (October 2019) |
| – Foul Sewerage and Utilities Assessment – Chapmanbdsp (November 2019) | – Sustainability Statement – XCO2 (October 2019) |
| – Commercial Space Strategy – Belspiel (September 2019) | – Townscape, Visual Impact and Heritage Assessment – Peter Stewart Consultancy (October 2019) |
| – Commercial Viability Assessment Report – Strettons (October 2019) | – Waste Management Plan – Transport Planning Practice (October 2019) |
| – Preliminary Risk Assessment and Appendices – Jomas Associates LTD (November 2018) | – Transport Assessment – Transport Planning Practice (October 2019) |
| – Environmental Noise and Impact Assessment – XCO2 (October 2019) | – Daylight & Sunlight Assessment – Robinsons Surveyors Limited (October 2019) |
| – Interim Travel Plan – Transport Planning Practice (October 2019) | – Flood Risk Assessment and SUDS Strategy – XCO2 (October 2019) |
| – Landscape Report – B:D Landscape Architects (October 2019) | |
| – Outline Car Parking Management Plan – Transport Planning Practice (October 2019) | |

Appendix 2 – Selected Plans and Elevations

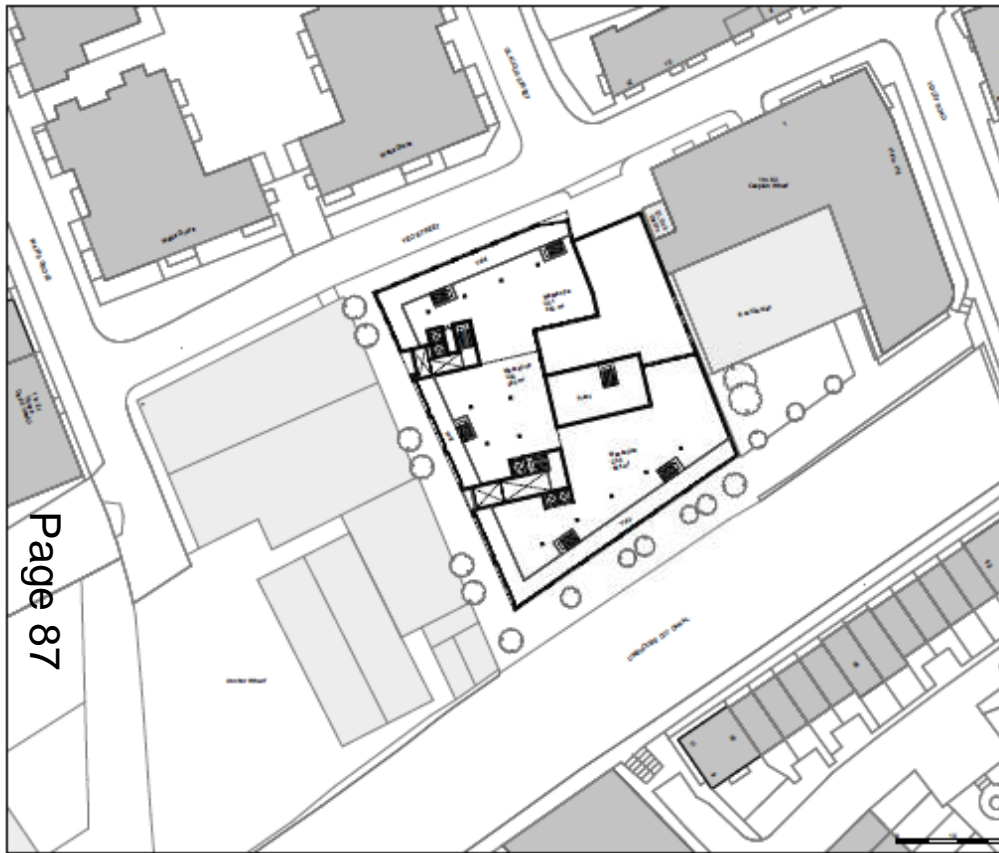
Site Location Plan:



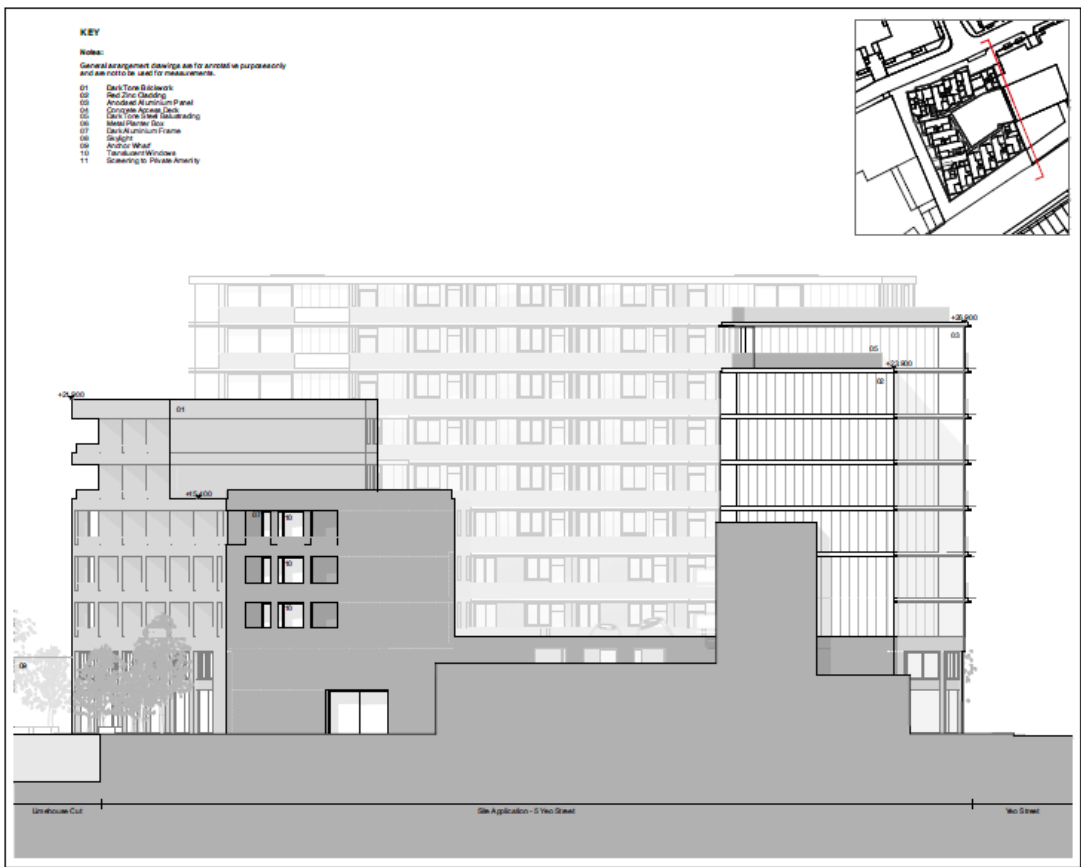
Ground Floor Plan:



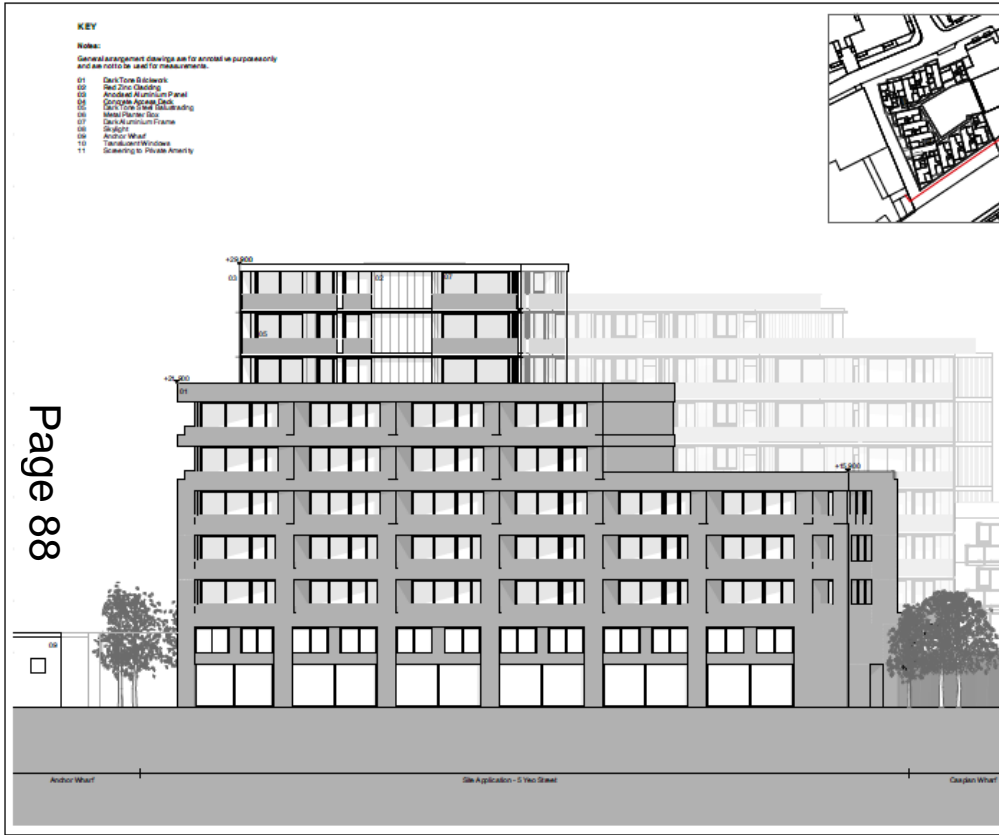
Mezzanine Level Floor Plan:



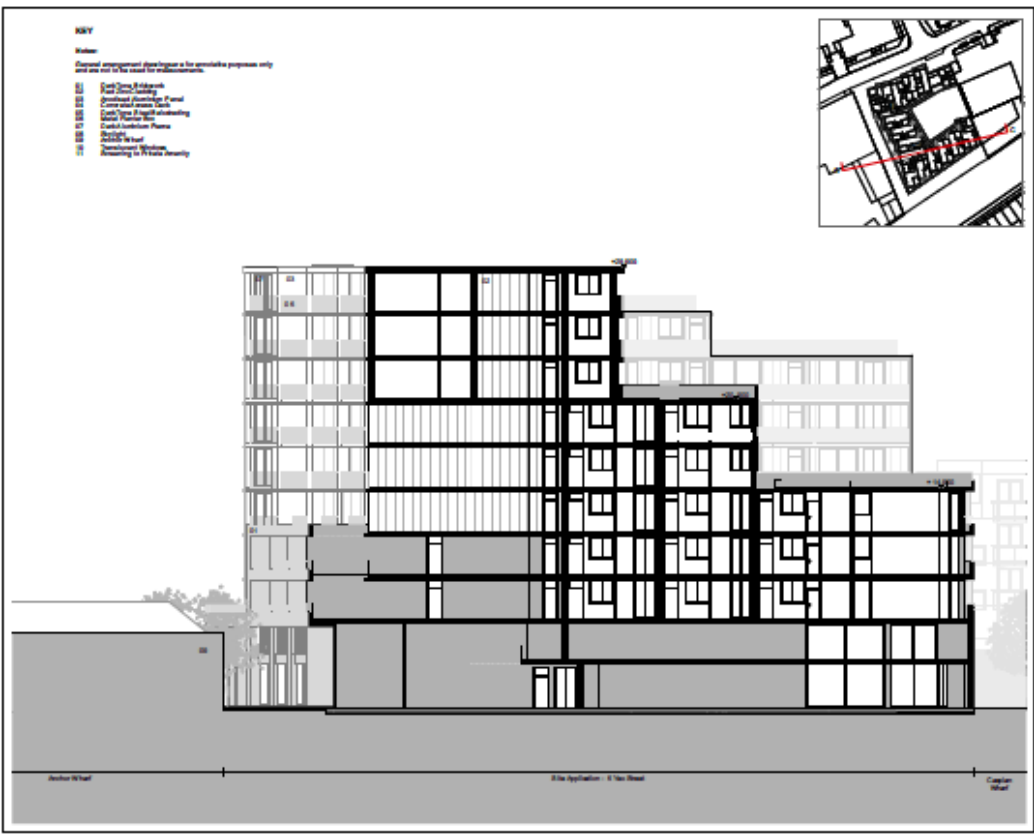
East Elevation:



South Elevation:



Section Plan:



Ground Floor Landscape Plan:



Roof Terraces Landscape Plan:



Preliminary Hard Landscaping Strategy

Hard Landscape Strategy

Illustrative Hard Landscape Plan



Preliminary Soft Landscaping Strategy

Soft Landscape Strategy

Illustrative Soft Landscape Plan

