



DEVELOPMENT COMMITTEE

[21 March 2022]

Report of the Corporate Director of Place

Classification: Unrestricted

Application for Planning Permission

[click here for case file](#)

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| Reference | PA/21/02703 |
| Site | Land comprising Harriot, Apsley & Pattison Houses and the Redcoat Community Centres, Stepney Green, London, E1 |
| Ward | Stepney Green |
| Proposal | Redevelopment of the site comprising demolition of existing buildings (including Harriott House, Apsley House, Pattison House, The Redcoat Centre and Redcoat Community Centre) to provide 412 residential units (Class C3) and 1,192m ² GIA of community use (Class E (e-f), Class F1 (e-f), Class F.2 (b)) provided across buildings ranging in height from 4-8 storeys, together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities. |
| Summary Recommendation | Grant planning permission subject to conditions |
| Applicant | London Borough of Tower Hamlets |
| Architect/agent | Renew Planning Limited |
| Case Officer | Kitty Eyre |
| Key dates | <ul style="list-style-type: none">- Application registered as valid on 13/12/2021- Public consultation finished on 17/01/2022 |

EXECUTIVE SUMMARY

The application proposes the demolition of Harriott House, Apsley House and Pattison House, and The Redcoat Centre and the Redcoat Community Centre, and the construction of new residential accommodation, in the form of 412 residential units, and 1,192m² of community use space, together with extensive landscaping and outdoor amenity space.

The development would re-provide 70 affordable rented and shared ownership properties on the site and deliver 55% affordable homes overall (including the re-provided units) and 42% affordable housing (excluding re-provided units). The proposed unit sizes meet the London Plan's minimum space standards. All units would have private amenity space provision that meets minimum standards.

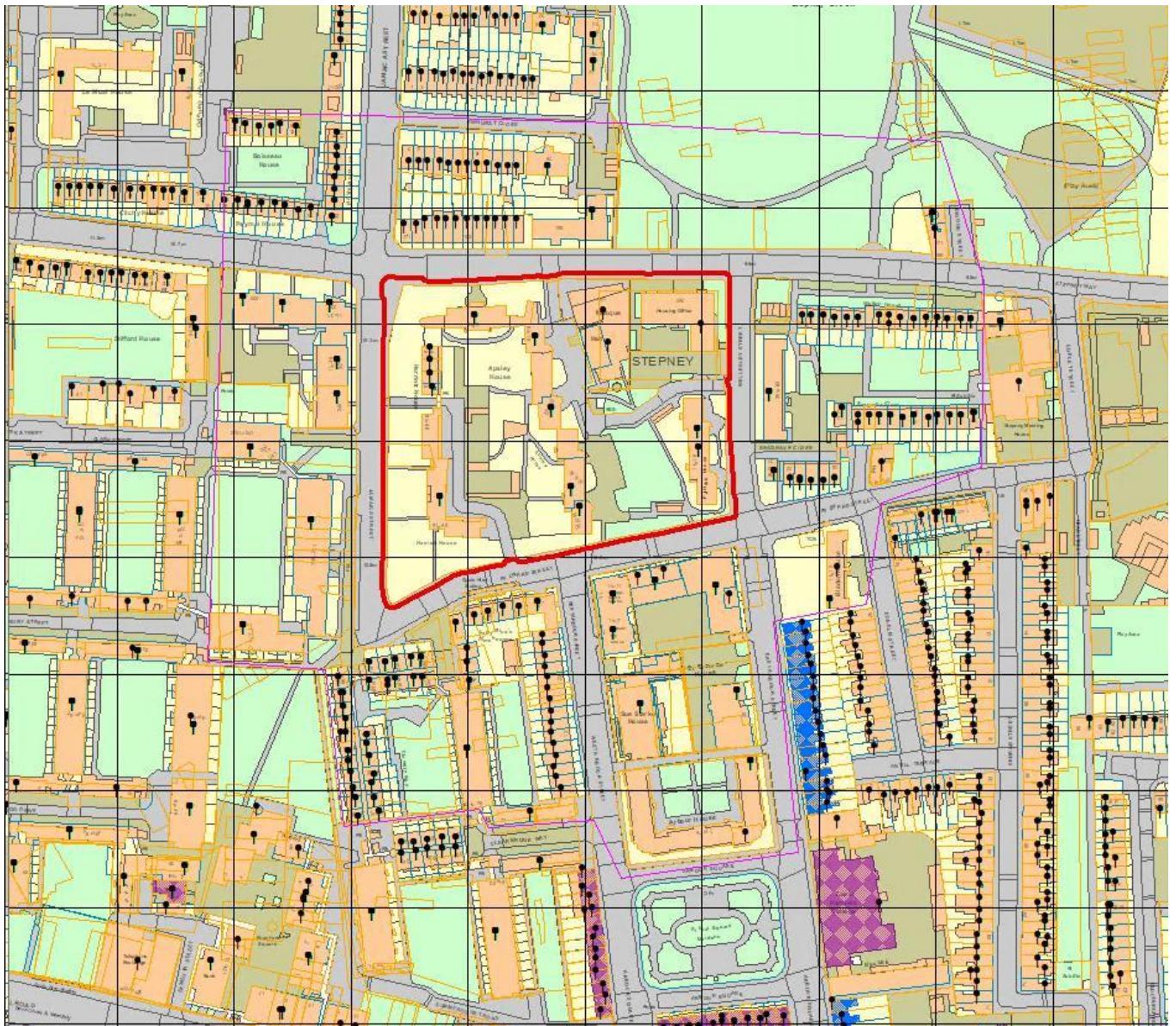
The proposed land use is supported and would assist the Council in meeting its housing targets. In particular, the provision of 180 affordable homes, including the re-provided units, would serve the needs of local residents.

The character and appearance of the proposed development would vary slightly across the site responding to location, use, the character of the surrounding streets. The height and massing of the proposed new building would respond appropriately to the local context. The proposed architectural quality and materiality of the scheme is acceptable to officers. In terms of landscaping, there are two communal courtyards that are only accessible to residents and an 'inner street' that is fully publicly accessible and provides a route from Stepney Way to Aylward Street improving connectivity in the area. This inner street would only be accessible by emergency and servicing vehicles. As part of the landscaping, dedicated child play space would be introduced, which does not exist at present. There would also be significant tree planting.

The development would provide policy compliant cycle storage, and sufficient wheelchair accessible parking. In addition, it meets the councils' policies on net zero carbon and biodiversity net gain.

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 (2021), the National Planning Policy Framework and all other material considerations.

Officers recommend the proposed development be granted planning permission, subject to conditions and subject to a legal agreement.



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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 | <h2>Planning Applications Site Map PA/21/02703</h2> <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>TOWER HAMLETS London Borough of Tower Hamlets</p> |
| | Scale : 50m grid squares | Date: 11 March 2022 |

1. SITE AND SURROUNDINGS

- 1.1 The application site measures approximately 1.78 hectares and is bounded by Stepney Way to the north, Jamaica Street to the west, Aylward Street to the south and Wellesley Street to the east. The site is square in shape and is currently occupied by three housing blocks (Harriott House, Apsley House and Pattison House) dating from 1954 and two council owned community buildings. The community use buildings are positioned directly to the north of Pattison House on Stepney Way.
- 1.2 The housing blocks are configured over 4-8 storeys on a largely vertical (north-south) grid with Apsley House aligned to the centre, Harriott House to the west and Pattison House to the east. There are currently 100 homes on the site comprising 30 Non-Resident Leaseholder (NRL), 34 Resident Leaseholder (RL) and 36 Secure Tenant (social rented) (ST) flats.
- 1.3 The community buildings consist of The Redcoat Centre, a single-storey building jointly occupied by the Council's Adult Services department and an organisation (Vibrance) providing services for vulnerable adults, and the Redcoat Community Centre, comprising 4 conjoined single-storey portacabin structures which are used by a local prayer group.

| Building | Existing use | GIA Sqm | No. homes |
|--------------------------|---------------------|----------------|------------------|
| Apsley House | Residential (C3) | 9809 | 36 |
| Harriott House | Residential (C3) | | 48 |
| Pattison House | Residential (C3) | | 16 |
| Redcoat Centre | Community use (F2) | 460 | N/A |
| Redcoat Community Centre | Community use (F2) | 660 | N/A |
| Total floorspace | | 10,929 | 100 |

Figure one – existing development floorspace

- 1.4 The remainder of the site consists of a mixture of hardstanding areas for serving and vehicular access and parking, and soft landscaping in the form of vertical sections of grass running north to south between the housing blocks. The hardstanding area incorporates 58 car parking spaces.



Figure two: Existing Site Plan



Figure three: Aerial View of the Site

- 1.5 The surrounding area is residential in character, with housing estates surrounding it on all four sides. To the north east of the site lies Stepney Green Park, a public green space. The height of the buildings within the surrounding context are generally similar to those on the site and predominantly between three and eight storeys. The buildings to the south of the site were generally built in the 1950s and before, whilst the buildings to the south and west are slightly more recent having been built between the 1960s and 1990s. There is little variety in the material palette of surrounding properties, with a predominance of brick facades, in particular buff brick.
- 1.6 The site does not sit within a conservation area, but there are a number of conservation areas close by including the Albert Gardens Conservation Area which is adjacent to the site on the southern side of Aylward Street. This Conservation Area incorporates the retained parts of the former Arbour Square Police Station and Magistrates Court building situated between West Arbour Street and East Arbour Street (now used as housing).



Figure four - Albert Gardens Conservation Area Boundary (red line boundary around the site)

- 1.7 The site is situated within a low probability flood risk area (Flood Zone 1) and Air Quality Management Area (AQMA), which was declared for the whole of the borough in 2002 due to high concentrations of NO₂ and particulate matter. The site is not situated within an Archaeological Priority Area.
- 1.8 The site has a PTAL (Public Transport Accessibility Level) of 4 and 5, which is very good, on a scale of 0-6b with 0 being the worst. 5 bus routes are accessible within 650 metres of the site. Limehouse Station is 950 metres south east of the site providing access to National Rail services and Docklands Light Railway (DLR) services between Bank and Lewisham, Bank and Woolwich Arsenal and Tower Gateway and Beckton. It is an approximately 11-minute walk to Stepney Green Underground Station and an approximately 13-minute walk to Whitechapel Station.

2. PROPOSAL

- 2.1 This application relates to the demolition of the all of the existing buildings on the site, including the community and residential buildings, and its redevelopment in the form of buildings ranging in height from 4-8 storeys to provide 412 new homes and 1,150m² (GIA) of community use floorspace (Class E (e-f), Class F1 (e-f), Class F.2), together with landscaped communal amenity spaces.
- 2.2 The proposed site layout would consist of two perimeter urban blocks, each constructed around a central communal courtyard, and a new pedestrian link and public space in a north-south orientation through the centre of the two permitter blocks (referred to as the 'inner street'). The perimeter blocks would be made up of 14 inter-linked blocks, with the exception of Block B4 which would be freestanding. 8 main housing blocks would be configured to the west of the inner street (Development Area A) and fronting Stepney Way (north), Jamaica Street (west) and Aylward Street (south) and 6 main housing blocks configured to the east of the inner street (Development Area B) and fronting Stepney Way (north), Wellesley Street (east) and Aylward Street (south).
- 2.3 All the blocks except B2 would be solely residential in use; Block B2 would contain 1192 sqm of community use floorspace at the ground floor level, with residential flats above.



Figure five – proposed site plan

- 2.4 The proposed development would incorporate 70 reprovided homes and 342 additional residential units. The 70 reprovided homes would comprise the 34 existing resident leaseholder (RL) properties (as shared equity units) and the 36 secure tenant- social rented (ST) properties on the existing site. Of the additional 342 residential units proposed, 110 units would be affordable housing, amounting to a 42% uplift in affordable housing by habitable room; and an overall provision of 55% affordable housing
- 2.5 The proposed development would be phased to enable the existing residents (resident leaseholders and secure tenants) to move only once as part of an agreed decant strategy and without a need to temporarily move off-site. The phasing strategy is as follows:
- Phase 1: Demolition of existing community building (including some garages and pram sheds) and construction of Blocks A3, A4 and B2. These blocks will contain all the proposed reprovision homes. The intention is that the local prayer group currently occupying the temporary portacabin structures will move into the new community space being provided at ground floor level of Block B2.
 - Phase 2: Once all the reprovision homes are occupied, the remaining housing blocks on the site will be demolished to enable the wider site construction, including the formation of the inner street and all associated landscape areas.
- 2.6 The community use space in the proposed development is expected to be occupied by the incumbent local prayer group. The remaining tenants (comprising the Council's Adult Services department and an organisation (Vibrance) providing services for vulnerable adults) will be relocated into alternative premises elsewhere in the borough.
- 2.7 The development includes provision for 35 disabled persons car parking spaces, 33 spaces would be within a ground level car park and a further 2 spaces would be located off the inner street. cycle parking is provided at ground floor in each of the housing blocks, with Block B2 also incorporating stores located on each of the upper floors. The proposed community space facility has space to accommodate an internal bike store.
- 2.8 The remainder of the site seeks to provide amenity areas comprising a mixture of communal amenity areas, children's play space and general landscaping.

3. RELEVANT PLANNING HISTORY

- 3.1 PA/04/01135 - Extension to the existing community building (D1 use class) by the positioning of two pre-fabricated units at the rear and creation of path to the proposed new entrance – permitted (04/11/2004)
- 3.2 PA/05/00166 - Extension to the existing community building (D1 use class) by the positioning of a 145sqm portacabin unit alongside the existing building and creation of path to the new main entrance – permitted (24/03/2005)
- 3.3 PA/06/02253 – Retention of a single storey extension to the south of the existing Redcoat Community Centre (Phase 1) and erection of single storey extension to the north of the existing Redcote Community Centre (Phase 2) to provide 324 sq m of additional community facilities (Class D1 Use) for a temporary period – permitted (11/04/2007)
- 3.4 PA/10/01857 - The retention of single-storey porta-cabin structures to the south and the north of the Redcoat Community Centre to provide community facilities (Use Class D1) – permitted (26/10/2010)
- 3.5 PA/20/01570 - Request for an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') in respect of a planned estate regeneration scheme relating to the 7 housing blocks (known collectively as Harriott House, Apsley House and Pattison House) bounded by Stepney Way the north, Jamaica Street to the west, Aylward Street to the south and Wellesley Street to the east and also including the Redcoat Centre and Redcoat Community Centre – EIA not required (13/08/2020)
- 3.6 PF/20/00170 - Phased demolition of all existing buildings on the site and the construction of up to 12 housing blocks (anticipated to be in separate configurations of 6 x inter-linked blocks each) ranging in height from 3 - 8 storeys including also the possibility of a 12-storey marker building on the north - eastern part of the site and providing approximately 450 residential units and 1,000m² GIA community use (which is expected to be occupied by the incumbent local prayer group)

4. PUBLICITY AND ENGAGEMENT

Pre-application

- 4.1 The submitted Statement of Community Involvement (SCI) sets out the non-statutory consultation undertaken by the applicant and how this influenced the application and revisions to it. The consultation process had three phases to it: the pre-ballot phase, the ballot, and the post-ballot phase. Since July 2018 the Mayor of London has required any landlord seeking GLA funding for estate regeneration projects which involve the demolition of social homes to show that residents have supported their proposals through a ballot. The Residents Ballot result revealed widespread support for the plans with 98.4% of residents (based on a 93.2% turnout of eligible voters) voting for the proposed development.
- 4.2 The pre-ballot consultation phase took place between June and December 2019 and consisted a number of drop-in events, a newsletter with regular communication about the proposed scheme, a website dedicated to the scheme and the establishment of a 'HAP Residents' Panel'. Post the ballot, another phase of consultation took place. This phase consisted of a series of online consultations, newsletters and a children-focused event.
- 4.3 According to the SCI, the key concern that continued to emerge throughout the consultation process related to the proposals for the scheme to be 'car free'.
- 4.4 In addition, throughout the consultation period discussions took place between the project team and the committee of the Redcoats Community Centre Mosque. These meetings focused on the occupancy needs and lease costs of the mosque.

4.5 Further details on the exact nature of the pre-application consultation events and the feedback given by community stakeholders can be found in the submitted SCI.

Statutory application consultation

4.6 Upon validation of the application, the Council sent out consultation letters to 875 nearby owners and occupiers. An advert was posted in the press and three Site Notices were displayed outside the site.

4.7 17 individual objection letters, two petitions one with 12 signatories and another with 750 signatures and 20 letters of support were received. 2 neutral comments / observations were received.

4.8 The objections raised are summarised below:

- Loss of natural light and overshadowing to existing properties (171-193 Stepney Way) in the vicinity of the development.
- Overlooking and loss of privacy
- Negative impacts for visual amenity
- Stress on parking, loading and turning
- Risks to highway safety
- Increased traffic generation
- Noise and disturbance resulting from constructions work
- Loss of trees
- Issues with the layout, density, design, appearance, materials and landscape of the building
- Concerns about the impacts on road access.
- Lack of light and ventilation to the main hall of the proposed community space.

4.9 The letters in support are summarised below:

- The neighbourhood would be safer – children would be able to play in safe and secured play areas.
- The lives of existing residents would be improved.
- Residents have voted in support of the scheme and there has been an active consultation process.
- The area is currently run down.
- The existing homes are in a poor condition – there is damp, condensation, vermin and rubbish. The proposed homes would be better looking and have modern amenities.
- There are currently problems with anti-social behaviour in the area, particularly at the car park next to the mosque.
- There will be a new community centre for local people to use.
- The scheme is well designed, with improved public spaces and landscaping.

5. CONSULTATION RESPONSES

5.1 Below is a summary of the consultation responses received from both external and internal consultees.

External responses

Cadent / Natural Gas

5.2 No objections.

Canal and river Trust

5.3 No comments.

Thames Water

5.4 No objections. Conditions to be levied requiring a piling method statement, and in relation to water network upgrades.

Greater London Authority

5.5 In summary:

- Principle of development: The principle of estate regeneration is supported. The significant uplift in affordable housing could be supported, subject to confirming that the existing social rent tenants and residents' leaseholders would be provided with a home suitable to meet their needs.
- Housing: The affordable housing offer would be 44% affordable housing based on a habitable room basis or 42% affordable housing on the net uplift. Review mechanisms and the affordability of the units must be secured.
- Urban design and heritage: the height and massing is considered appropriate and overall design and residential quality is high and therefore fully supported. The location of the fire evacuation assembly point should be confirmed and additional landscaping could be provided between single aspect facing units to improve aspect.
- Transport: the long stay cycle parking design should be improved. More ambitious Travel Plan targets and more specific measures for increasing active travel are required. A Stage 1 Road Safety Audit is required prior to determination for Jamaica Street highway works. A Delivery and Servicing Plan and Construction Logistics Plan along with other obligations should be secured.
- Sustainable development: Further information on energy and urban greening is required.

Historic England

5.6 No comments.

Historic England Archaeology

5.7 No objections. Conditions to be secured requiring no demolition or development to take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the LPA in writing.

Health and Safety Executive

5.8 No objections. Content with the fire safety information provided. The applicant responded to and updated the scheme in response to earlier concerns from HSE.

Met Police

5.9 No objections. A Secured by Design condition to be levied.

Natural England

5.10 No comments.

Transport for London

5.11 No objections. Stage 1 Road Safety Audit of inner street and Active Travel Zone improvements should be conditioned.

Internal Responses

LBTH Biodiversity

5.12 Comments are incorporated within the 'Biodiversity' section of this report. Conditions to be secured in relation to biodiversity mitigation and enhancement, and invasive species.

LBTH Tree Officer

5.13 Objection overcome. Content with the retention of the Category A (London Plane) tree and the re-planting ratio of 1:4 on the masterplan.

LBTH Energy and Sustainability

5.14 No objections. Carbon offsetting contribution should be secured through a S106 clause, or equivalent. A condition should be secured requiring the scheme to achieve a BREEAM Excellent score.

LBTH Environmental Health

Noise and Vibration

5.15 No objections. Conditions relating to restrictions on demolition and construction activities, noise mitigation measures, noise associated with the community space and mechanical plant noise should be secured.

Air Quality

5.16 The Air Quality Assessment is acceptable. Concerns about NO₂ levels along Stepney Way; officers have recommended no terraces and no balconies until 2nd floor including (only openable winter gardens) facing Stepney Way. This has been addressed in 'Environment' section of the report.

5.17 Conditions should be secured in relation to Dust Management Plan and PMO Monitoring, Air Quality Mechanical Ventilation and Construction Plant and Machinery.

Contaminated land

5.18 The desk study provided is sufficient. Conditions to be secured relating to a remediation scheme to deal with potential ground contamination.

LBTH Housing

5.19 No objections. Comments are incorporated within the 'Housing' section of this report.

LBTH Sustainable Urban Drainage

5.20 No objections. Comments are incorporated within the Flood Risk and Drainage section of this report.

LBTH Transportation & Highways

- 5.21 No objections. There were initial concerns relating to perpendicular parking on Jamaica Street. The plans have since been amended to remove this parking and hence these concerns have been dealt with.
- 5.22 Conditions to be secured in relation to a permit free agreement, accessible parking bays, cycle parking facilities, vehicle and cycle parking management, demolition and construction management plan and a s278 agreement.

LBTH Waste Policy & Development

- 5.23 No objections. A condition requiring a waste management plan to be submitted should be levied to deal with outstanding issues.

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 (2021)
- Tower Hamlets Local Plan 2031 (2020)

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

Land Use (residential, community)

- London Plan policies: H1, GG1, S1
- Local Plan policies: S.H1, S.CF1, D.CF2, D.CF3

Housing (affordable housing, housing mix, housing quality, fire safety, amenity)

- London Plan policies: D6, D7, D11, D12, H4, H5, H6, H8, H10
- Local Plan policies: S.H1, D.H2, D.H3

Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage)

- London Plan policies: D1, D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4
- Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, D.DH6, D.DH7

Amenity (privacy, outlook, daylight and sunlight, noise, construction impacts)

- London Plan policies: D3, D6, D9
- Local Plan policies: D.DH8

Transport (sustainable transport, highway safety, car and cycle parking, servicing)

- London Plan policies: T2, T4, T5, T6, T6.1, T7, T8
- Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4

Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste)

- London Plan policies: G5, G6, SI1, SI2, SI5, SI8, SI12, SI13
- Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.MW3

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

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (as updated)
- The National Model Design Code
- The National Design Guide
- LBTH Planning Obligations SPD (2021)
- LBTH High Density Living SPD (2020)
- LBTH Reuse, Recycling and Waste SPD (2021)
- Central Area Good Growth SPD (2021)
- LBTH Community Infrastructure Levy (CIL) Charging Schedule (2020)
- LBTH Development Viability SPD (2017)
- The Mayor's Good Practice Guide to Estate Regeneration (2018)
- LP Housing SPG (updated 2017)
- LP Social Infrastructure SPG (2015)
- LP Play and Informal Recreation SPG (2012)

- LP Character and Context SPG (2014)
- LP Accessible London SPG (2014)
- LP Affordable Housing and Viability SPG (2017)
- LP Control of dust and emissions during construction and demolition SPG (2014)
- LP Planning for Equality and Diversity SPG (2007)
- Building Research Establishment's Site Layout for Daylight and Sunlight: A Guide to Good Practice (2011)

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Design & Heritage
- iv. Neighbour Amenity
- v. Transport
- vi. Environment
- vii. Infrastructure
- viii. Local Finance Considerations
- ix. Equalities and Human Rights

Land Use

Residential use

7.2 Increasing housing supply is a fundamental policy objective at national, regional and local levels. The NPPF encourages the effective use of land through the reuse of suitably located previously developed land and buildings.

7.3 The predominant existing use of the site is residential and, as such, the principle of the residential use has been established. London Plan and Local Plan policies resist the loss of existing housing unless there is no net loss. The delivery of housing, and particularly affordable housing, is a priority in the borough. The proposal for the re-provision of the existing social rented homes and intensification of the residential use with the provision of additional units is supported.

Community use

7.4 London Plan Policy S1 protects social infrastructure unless there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community; or the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services. It also stipulates that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative uses are proposed unless this loss is part of a wider public service transformation plan.

7.5 Local Plan Policy S.CF1 supports proposals which seeks to protect, maintain and enhance existing community facilities and makes clear there is a presumption against the loss of community facilities to ensure that there is sufficient provision to meet local needs.

7.6 Policy D.CF2 advises that existing community facilities should be retained, unless it can be demonstrated that: a) there is no longer a need for the facility or an alternative community use within the local community, or, b) a replacement facility of similar nature that would better meet the needs of existing users is provided. The policy also states that where community facilities are re-provided on site as part of any new development, the quality and accessibility of these facilities (including public access) should be enhanced. Specifically, in

the context of estate regeneration schemes, Policy D.H2 (Part 5) also requires existing community facilities to be protected and enhanced.

- 7.7 The proposal would involve the demolition of the existing community buildings (1,120 sqm) and the reprovision in the form of a new community space comprising 1,192 sqm of floorspace, which would result in a slight uplift in net area. It is anticipated that this space would be occupied by the local prayer group, who currently makes use of the Redcoat Community Centre on the site.
- 7.8 The site currently comprises two council owned buildings in the form of the Redcoat Centre and the Redcoat Community Centre. The Redcoat Centre is a single storey building jointly occupied by the Council's Adult Services department and Vibrance, an organisation providing services for vulnerable adults. The council has provided a statement confirming that a suitable alternate space on the ground floor of Pritchards Road has been found for Vibrance to occupy. Heads of Terms have been agreed in principle and council lawyers are drafting the lease for Pritchard Road. The Council's Adult Services team has already moved out of the site and the portion of the Redcoat Centre they occupied is being temporarily occupied by the St Barts hospital social work team, who will stay here until they relocate to the new town hall. Given that alternative premises have been provided in the borough for Vibrance and the Adult Services team, the test set out under Part 1A of Policy D.CF2 of the Local Plan have been met.
- 7.9 The Redcoat Community Centre comprises four conjoined single storey portacabin structures, which are used by a local prayer group, Redcoat Community Centre and Mosque (RCCM). The RCCM will occupy the new community space below one of the new residential blocks. The initial proposal included a main hall that would not have any windows. the plans have since been amended to provide windows on the east elevation, providing natural light and ventilation to the main hall. This quality and accessibility of the new facility would be enhanced relative to the current facility; the materials would be high quality and durable, the space better meets the needs of the RCCM and the site would be fully accessible. Therefore, the requirements of Policy D.CF2 have been met.
- 7.10 In conclusion, the proposals in terms of the demolition of the existing community space and the provision of a new larger community space meet the requirements of policy and would ensure that all of the community facilities currently on site either have a new space reprovided on site or access to an alternative community space within the local community.

Land use conclusion

- 7.11 In summary, the proposed residential led development and community use floorspace is considered acceptable and in accordance with the planning policy.

Housing

Housing supply

- 7.12 London Plan Policy H1 sets Tower Hamlets a housing completion target of 34,730 units between 2019/20 and 2028/29. The proposed development would result in a net uplift of 312 new homes on the site, which would make an important contribution towards meeting the above target and is strongly supported.

Estate Regeneration

- 7.13 London Plan policy H8 requires that loss of existing housing be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. This policy also seeks a consideration of alternative options before the demolition and replacement of affordable homes. In addition, the policy requires the replacements social rent units to be provided as social rent where facilitating a right of return for existing tenants.

- 7.14 Part 5 Tower Hamlets Local Plan policy D.H2 provides a set of criteria which estate regeneration schemes are required to follow. These include the following:
- a. protect and enhance existing open space and community facilities

- b. protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels.
 - c. provide an uplift in the number of affordable homes, and
 - d. include plans for refurbishment of any existing homes to the latest decent homes standard.
- 7.15 The Mayor's Good Practice Guide to Estate Regeneration provides detailed guidance for assessing approaches to estate regeneration. The guide puts great emphasis on early consultation and engagement with residents and requires all estate regeneration schemes to provide an increase in affordable housing, full rights to return or remain for social tenants, and a fair compensation deal for leaseholders and freeholders.
- 7.16 **Like for like replacement and right to return.** London Plan Policy H8 states that replacement affordable housing must be provided at social rent levels, where it is being provided to facilitate a right of return for existing social rent tenants. Of the 100 flats of the existing site 34 are occupied by Resident Leaseholders (RL) and 36 are occupied by Secure Tenants. The secure tenants will have a right to a tenancy of a newly built social rented home and will continue to be a tenant of Tower Hamlets Council with their existing tenancy rights such as the right to buy and succession rights retained. These tenants would be charged according to the same social rent calculation formula, with the same assumptions, as prior to moving. Resident leaseholders will have the option to buy a suitable replacement home (with the same number of bedrooms) in the new development, if this is their preference, and at no extra cost. In order to ensure these commitments can be realised, the proposed development would incorporate 70 replacement homes comprising the 34 Resident Leaseholder (RL) properties (as shared equity units) and the 36 Secure Tenant (ST) properties. Although the GLA do not consider the 34 Resident Leaseholder products to be intermediate products, the council does classify these homes to be an intermediate product. In addition to the replacement units, it is understood that the applicant has identified 22 of the additional affordable housing units proposed in order to rehouse qualifying adult children still living with their parents in existing overcrowded accommodation on the estate, which is strongly supported. These units would be provided at London Affordable Rent levels and limited to one applicant per property.
- 7.17 **Alternatives to demolition.** London Policy H8 states that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. The site currently has considerable issues, including damp, overcrowding and poor-quality amenity space. The proposed regeneration programme would re-provide homes to modern standards by delivering high-quality residential development, re-provide an improved community space and would increase affordable housing provision. Given this, officers support the proposed demolition.
- 7.18 **Maximising additional genuinely affordable housing.** As set out in the Mayor of London's GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. This is discussed under the Affordable Housing heading below. In summary, officers consider that the proposed development would provide the maximum reasonable amount of affordable housing.
- 7.19 **A fair deal for leaseholders and freeholders.** As set out in the Mayor of London's GPGER Leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. As detailed in the 'Proposed decant strategy' report leaseholders would be offered fair compensation in line with statutory requirements.
- 7.20 **Full and transparent consultation.** The Mayor's GPGER requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional

arrangements. The Council's capital delivery team undertook a ballot in April 2020, which resulted in a 98% 'yes' vote to the scheme based on a 93% turnout. In addition, the applicant's Statement of Community Involvement sets out details of the public consultation and engagement undertaken with the wider residents of the estate. Officers consider that the scope and extent of the engagement as detailed in the SCI generally accords with the key principles set out in the Mayor of London's GPGER.

Housing mix and Tenure

- 7.21 The existing 100 homes on the site comprise of the following:

| | Non-resident leaseholder | Resident leaseholder | Secure tenant | Total count of dwelling size |
|-------|--------------------------|----------------------|---------------|------------------------------|
| 2-bed | 14 | 7 | 11 | 32 |
| 3-bed | 13 | 23 | 24 | 60 |
| 4-bed | 3 | 4 | 1 | 8 |
| Total | 30 | 34 | 36 | 100 |

Figure six – existing homes on site

- 7.22 London Plan Policy H10 requires developments to consist of a range of unit sizes. Tower Hamlets Local Plan Policy D.DH2 also seeks to secure a mixture of small and large housing that meet identified needs which are set out in the Council's most up-to-date Strategic Housing Market Assessment (2017). The table below sets out the schemes housing mix inclusive of the re-provided homes against the policy requirements set out in D.H2

| | | Affordable housing | | | | | | Market housing | | |
|-------------|-------------|--------------------|--------|------------------|---------------------|--------|-----------------|----------------|--------|-----------------|
| | | Social rent | | | Intermediate tenure | | | | | |
| Unit size | Total units | Units | As a % | Policy targets % | Units | As a % | Policy target % | Units | As a % | Policy target % |
| 1-bed | 107 | 15 | 12% | 25% | 6 | 11% | 15% | 86 | 37% | 30% |
| 2-bed | 163 | 27 | 22% | 30% | 17 | 32% | 40% | 119 | 51% | 50% |
| 3-bed | 109 | 56 | 44% | 30% | 26 | 48% | 45% | 27 | 12% | 20% |
| 4-bed | 33 | 28 | 22% | 15% | 5 | 9% | | 0 | 0% | |
| Total units | 412 | 126 | 100% | 100% | 54 | 100% | 100% | 232 | 100% | 100% |

Figure seven – housing mix (inclusive of re-provided homes)

- 7.23 Overall, the whole development would deliver 34.4% of family sized homes. Within the market housing there would be an under provision of family sized homes and an overprovision of one bed and two bed units. However, there is an overprovision of family sized homes within the intermediate tenure and social rented housing, where there is the greatest need. Therefore, on balance we feel that the housing mix and tenure are considered acceptable.
- 7.24 The table below sets out the schemes' housing mix excluding the re-provided homes against the policy requirements set out in D.H2.

| | | Affordable housing | | | | | | | Market housing | | |
|-------------|-------------|--------------------|--------|------------------|---------------------|--------|-----------------|-------|----------------|-----------------|--|
| | | Social rent | | | Intermediate tenure | | | | | | |
| Unit size | Total units | Units | As a % | Policy targets % | Units | As a % | Policy target % | Units | As a % | Policy target % | |
| 1-bed | 106 | 14 | 16% | 25% | 6 | 30% | 15% | 86 | 37% | 30% | |
| 2-bed | 147 | 17 | 19% | 30% | 11 | 55% | 40% | 119 | 51% | 50% | |
| 3-bed | 67 | 37 | 41% | 30% | 3 | 15% | 45% | 27 | 12% | 20% | |
| 4-bed | 22 | 22 | 24% | 15% | - | | | - | | | |
| Total units | 342 | 90 | | | 20 | | | 232 | | | |

Figure eight – housing mix (excluding re-provided homes)

- 7.25 Without taking into consideration the re-provided homes into the housing mix, there would be an under provision of family sized homes and an overprovision of one bedroom and two bedroom units within the intermediate tenure.
- 7.26 Great weight is given to the adequate re-provision of all of the existing social rented and intermediate tenure homes and the overall high provision of family sized homes, and particularly affordable homes within the proposed scheme. The proposal has been viability tested which is outlined below. On balance, the proposed housing mix and tenure are considered acceptable

Affordable Housing

- 7.27 London Plan policy H8 states that all proposals demolishing and replacing affordable housing would be subject to a viability tested route.
- 7.28 Tower Hamlets Local plan policy S.H1 sets an overall strategic target of 50% of affordable housing, with a minimum of 35% provision sought, subject to viability. The policy refers to the GLA's Affordable Housing and Viability SPG which requires a minimum of 50% affordable housing provision for applications on industrial land or public sector land where there is no portfolio agreement with the Mayor to be considered under the fast-track route.
- 7.29 Tower Hamlets Local Plan Policy S.H1 sets an overall strategic target of 50% of affordable housing, with a minimum of 35% provision sought, subject to viability.
- 7.30 Tower Hamlets Local Plan Policy D.H2 sets the requirements of affordable housing provision within development in the borough, in terms of quantum, standard and provision. Development is required to maximise the provision of affordable housing with a 70% affordable rented and 30% intermediate tenure split (Para. 9.30 making clear that rented housing is expected to be 50% London Affordable Rent and 50% Tower Hamlets Living Rent).
- 7.31 Tower Hamlets Local Plan Policy D.H3 requires development to provide affordable housing which is not externally distinguishable in quality from private housing.

Amount and tenure

- 7.32 Of the total 412 units, the scheme would provide 55% (by habitable room) affordable homes, inclusive of the re-provided homes. Of the additional 342 units, the scheme would provide 42% affordable housing, excluding the re-provided homes.
- 7.33 London Plan policy H8 states that all development proposals that include the demolition of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. The application is supported by a Financial Viability Assessment (FVA) prepared

by Redloft, which has been reviewed and scrutinised by the Council's viability officers and GLA officers. Following a robust review of the submitted viability evidence, the Council's viability team has concluded that there would be a financial deficit against the scheme and consequently it would not be possible to secure any further affordable housing.

- 7.34 Within the affordable rent tenure, the proposals include the re-provision of 36 units and the additional provision of 90 units. The re-provided homes would retain the existing social rent structure. The additional affordable rented homes would be provided along an 82:18 Tower Hamlets Living Rent to London Affordable Rent split by habitable room. This does not align with the policy requirement for a 50:50 split between the two. However, housing officers are willing to accept this approach given the very strong overall affordable housing officer and the viability challenges this scheme faces. The 2021/22 rents for LAR and THLR are shown the table below.

| London Affordable Rent (LAR) 2021/22 Published by the GLA | | Tower Hamlets Living Rent (THLR) 2021/2022 (inc service charges) |
|--|------------|--|
| | £ per week | £ per week |
| 1 bed | 161.71 | 196.86 |
| 2 bed | 171.20 | 216.54 |
| 3 bed | 180.72 | 236.23 |
| 4 bed | 190.23 | 255.92 |
| 5 bed | 199.73 | 265.76 |

Figure nine – 2021/22 rent levels

- 7.35 Within the intermediate tenure, the proposals include the additional provision of 20 units. The additional units are all being provided as shared ownership products.
- 7.36 The proposed tenure split between affordable rent and intermediate tenure for the additional residential units equates to 71:29 in favour of affordable rent by habitable room. This is close to a policy compliant requirement of 70:30 and is considered acceptable.
- 7.37 The affordable units (affordable rent and intermediate tenure) would be provided in separate blocks to the market units. However, the blocks would be spread across the development and would share amenity spaces. The housing development would be tenure blind, in terms of the external and internal design quality of the blocks. This would be further secured by condition. The below schedule sets out which blocks are occupied by which tenure:

| Block | Tenure |
|-----------------|--------------|
| A1, A2 | Private |
| A3, A4 | Intermediate |
| A5 | Affordable |
| A6, A7 | Private |
| XX ¹ | Affordable |
| B1 | Private |
| B2 | Intermediate |
| B3 | Private |
| B4, B5, B6 | Affordable |

Figure ten – Housing blocks by tenure

Viability

- 7.38 The councils Viability Team conclude that the scheme proposes the maximum reasonable amount of affordable housing that could be provided. In line with relevant policy and guidance, to ensure that the maximum reasonable amount of affordable housing is delivered, it is recommended that a condition is secured requiring an Early Stage Review. This would re-consider viability in the event that any planning permission is not implemented within two years from the date it is granted. A Mid Stage Review (at the end of phase 1) and a Late Stage Review is also required.

Conclusion

- 7.39 In conclusion, the provision of affordable housing is considered to be appropriate and as such, on this point, the proposed development is considered acceptable.

Wheelchair Accessible Housing

- 7.40 London Plan policy D7 and Tower Hamlets Local Plan Policy D.H3 require residential developments that at least 10% of dwellings must meet Building Regulation M4 (3) ‘wheelchair accessible dwellings’ and the remainder of dwellings to meet M4 (2) ‘accessible and adaptable dwellings’.
- 7.41 The proposed development would provide 34 wheelchair accessible dwellings, which would comprise of 10% of the additional dwelling provision. These units would be in the form of 2/3/4-bed units.
- 7.42 Of the total wheelchair accessible units, 24 would be within the affordable rented sector and the remaining 10 units within the private units.
- 7.43 Each of the wheelchair units would be served by two lifts, which is in line with good practice. The wheelchair units meet the space standards. However, a condition should be secured requiring adjustments to be made to the current layout of the units, in line with comments provided by the Council’s Occupational therapists.
- 7.44 In regard to the re-provided units, based on the housing needs assessment, currently no resident requires a fully wheelchair accessible home.

¹ Units labelled XX are ground floor access dwellings with no association to any cores. These homes have their own front doors, individual bin and bike storage and access to the courtyards directly from their homes.

Quality of Residential Accommodation

- 7.45 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This policy also requires the maximisation of dual aspect dwellings and the provision of sufficient daylight and sunlight to new dwellings.
- 7.46 Tower Hamlets Local Plan Policy D.H3 requires developments to meet the most up-to-date London Plan space standards and provide a minimum of 2.5m floor-to-ceiling heights.
- 7.47 Private amenity space requirements are determined by the predicted number of occupants of a dwelling. Local Plan Policy D.H3 sets out that a minimum of 5sqm is required for 1-2 person dwellings with an extra 1sqm provided for each additional occupant.
- 7.48 In addition, London Plan Housing SPG reiterates the above standards and states that a maximum of eight dwellings per each core on each floor. Within the proposed development, there are three circumstances in which there are 9 units per floor to a stair core, rather than the policy prescribed 8 (see an example floor plan below). Officers accept that there can be site layout constraints that prevent the target of 8 being met. Given that there are only three circumstances in which the target has been breached, and in each case only be one unit, the proposal is still considered to provide a suitable standard of accommodation from this perspective.
- 7.49 Out of the total proposed units, 70% would be dual aspect. and the layout of the units has been designed such that there would be no north facing single aspect units, which is welcomed.
- 7.50 The proposed unit sizes meet the London Plan's minimum standard. All units would have private amenity space provision that meets minimum standards.

Noise / Air quality

- 7.51 As confirmed by the Council's Environmental Health officers, the proposed residential units would not be subjected to unacceptable noise conditions. Conditions would be secured to ensure that new accommodation is constructed to appropriate standards with regard to acoustic insulation, noise levels from the community space are not audible from residential units and noise from mechanical plants is kept within appropriate levels.

Air Quality

- 7.52 Tower Hamlets Local Plan Policy D.ES2 requires development to be at least 'Air Quality Neutral' and calls on air quality impacts to identify any necessary mitigation for developments that would cause harm to air quality.
- 7.53 This application is supported by an 'Air Quality Assessment', inclusive of a 'Dust Risk Assessment'. The site is within the borough-wide Air Quality Management Area (AQMA) (NO₂ objective and 24-hour mean PM₁₀ objective). The north elevation of the proposed development faces onto Stepney Way, where nitrogen dioxide (NO₂) concentration levels are above the national objective of 40µm per m³. Due to the poor air quality along Stepney Way the air quality officer has advised that there be no terraces and balconies until, and including, 2nd floor on the Stepney Way elevation. In many cases, the only private amenity space available to these units is in the form of terraces and balconies facing onto Stepney Way. Officers are of the opinion that, on balance, it is better for future occupiers to have access to private outdoor amenity space than not and hence these terraces and balconies should remain despite the air quality concerns.
- 7.54 A condition will be secured requiring details of the mechanical ventilation system to be in place for residential units facing Stepney Way, on ground, first and second floors prior to superstructure works. This mechanical ventilation system can be used in the place of opening windows or balcony doors when necessary. In addition, it is noted that there are a number of mature trees that form a barrier between the proposed development and Stepney Way, which should provide a natural defence against poor air quality. The combination of the above condition and the existence of these trees will help to protect future occupiers from the health risks associated with poor air quality.

Privacy & Outlook

- 7.55 In accordance with Policy D.DH9, a distance of approximately 18 metres between windows of habitable rooms would reduce inter-visibility to an acceptable degree. As illustrated by Figure eleven, there would be at least an 18-metre separation distance between all windows. Therefore, officers can be confident that future occupiers would not suffer from unacceptable overlooking or compromised outlook.

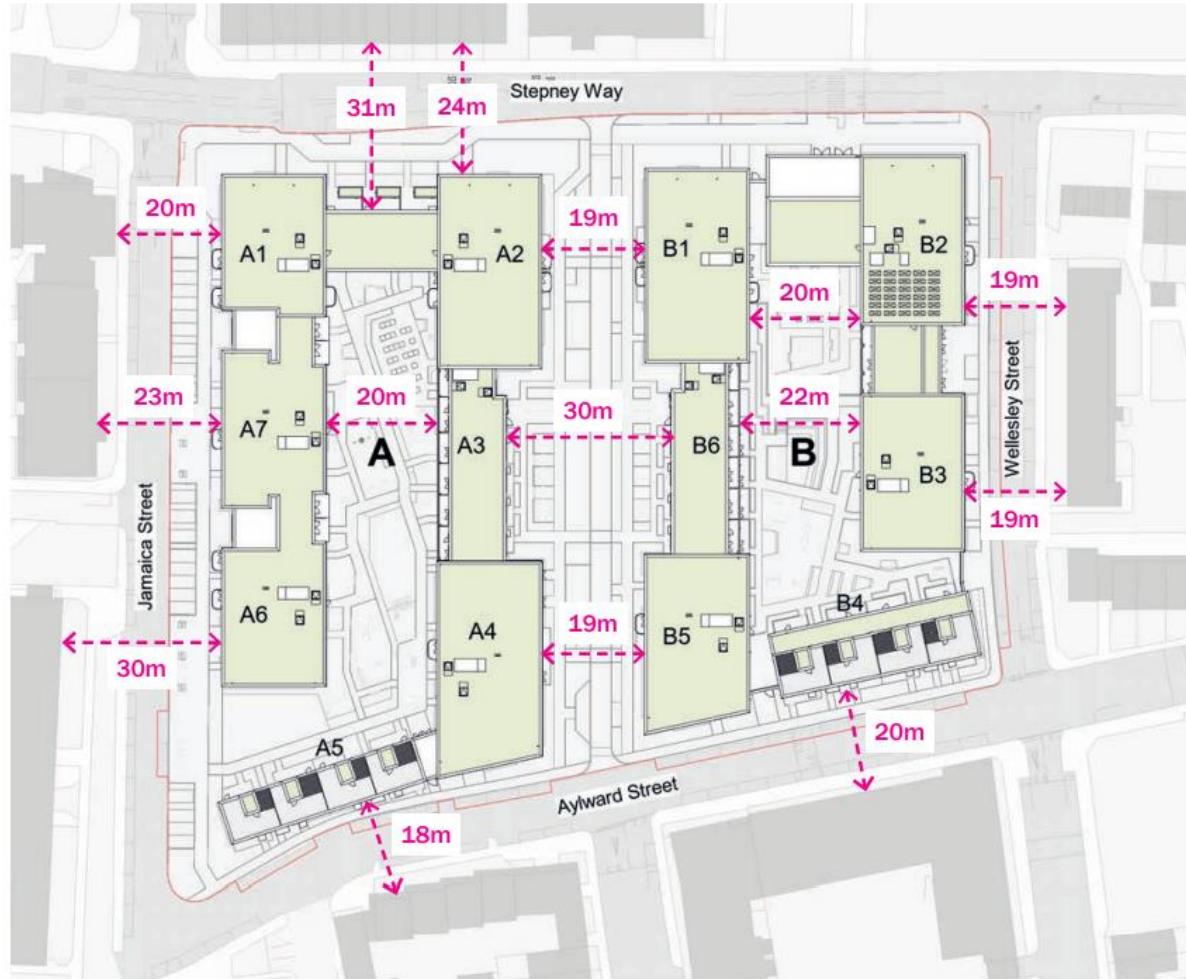


Figure eleven – proposed development separation distances

Daylight, Sunlight & Overshadowing

- 7.56 The applicant has submitted an internal Daylight and Sunlight Assessment which relates to the 2nd edition of "Site Layout Planning for Daylight and Sunlight: a good practice guide" by PJ Littlefair (Building Research Establishment (BRE), 2011) and BS EN 17017:2018: Daylight in Buildings, published by the British Standards Institution (BSI).
- 7.57 Vertical Sky Components (VSC), Average Daylight factors (ADF) and Target Illuminance tests have been carried out on all habitable rooms of the proposed development. The reported results show that 1122 of the 1423 rooms (79%) assessed will meet the BRE target for respective room use using the ADF test. This represent a good adherence rate and that the proposed units show the potential to achieve levels of daylight that are representative for the location.
- 7.58 In relation to sunlight within the proposed development, the Assessment tests Annual Probable Sunlight Hours (APSH), Winter Probable Sunlight Hours (WPSH) and Sunlight Exposure Hours. For the APSH and WPSH tests, 420 living rooms were assessed, with 85% of the rooms achieving sufficient access to sunlight, with many living rooms having access to south facing balconies and windows.
- 7.59 The assessment of sunlight to the proposed amenity areas shows that two of the three proposed amenity areas will adhere to the BRE guidelines. The exception, which is the inner street amenity area, receives 2-hours of sunlight to 48% of the total area which is only

marginally below the BRE 50% guideline. Given this, it is considered that the proposed amenity areas would receive sufficient sunlight.

- 7.60 Given that the proposed development is situated in a dense urban environment, these daylight and sunlight levels are considered to provide an adequate standard of accommodation for future occupiers.

Wind/Microclimate

- 7.61 The application was supported with the submission of an Environmental Wind Planning Report prepared by Arup. This study concluded that wind conditions within and around the completed development are expected to generally remain within 'Standing' to 'Strolling' levels and no areas are likely to reach the distress conditions.

- 7.62 However, prior to the erection of Phase 2 buildings, the Phase 1 buildings (Blocks A3, A4 and B2) will be exposed to stronger wind conditions. Wind conditions are generally expected to remain within 'Standing' to 'Business Walking' levels, making them acceptable for use. The Wind Planning Report sets out a number of key mitigation measures that should be implemented to help ensure wind conditions remain acceptable. A condition is recommended, requiring the applicant to implement appropriate wind mitigation measures.

Fire safety

- 7.63 London Plan (2021) policy D12 requires all major applications to be submitted with a Fire Statement produced by a third party, suitably qualified assessor. The policy sets out the requirements in terms of details that Fire Statement should contain. London Plan Policy D5 (part B5) states that new development should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

- 7.64 Under amendments to the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 ("the 2021 Order") buildings containing two or more dwellings or educational accommodation of 18m, or 7 storeys or more, in height are required to go through the Planning Gateway One. For Planning Gateway One the developer is required to submit a fire statement setting out fire safety considerations specific to the development with a relevant application. This fire statement is then assessed by the Health and Safety Executive.

- 7.65 The application is supported by a Fire Statement, produced by Jeremy Hughes who are considered to be a third party and suitably qualified assessor.

- 7.66 Minor amendments were made to the drawings during the course of the application to address concerns raised initially by the HSE. The HSE responded again in relation to the revised drawings and now support the proposal, with the development now meeting the relevant fire safety standards. Appropriate escape routes are in place, hose coverage distances meet requirements and there would be safe access for fire and rescue services.

Communal Amenity Space & Play Space

- 7.67 London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10sqm per child.

- 7.68 Local Plan Policy D.H3 requires a minimum of 50 sqm of communal amenity space for the first 10 units and a further 1sqm for every additional unit thereafter, as well as the provision of appropriate child play space as determined by the child yield calculator.

- 7.69 Local Plan Policy D.OWS3 sets out that development on areas of open space is only acceptable in exceptional circumstances as part of a wider development proposal, where there is an overall increase in quantity and quality of open space.

- 7.70 The existing site provides a total of 9,196 sqm of open space. This open space is in the form of defensible space around the edge of the estate blocks and central areas of unlandscaped grass and hardstanding/ car parking. Although not fenced off, these areas have the character of communal housing estate land and it is not expected that local residents residents use the space. There is currently a public pedestrian route through the centre of the estate that links Aylward Street with Stepney Way, but this route is neither obvious nor legible and, from the street, appears to lead only into the estate. It is also dominated by vehicles in part and does not comprise a safe pedestrian route either for residents of the estate or the wider area.
- 7.71 The proposed development would provide 8,421 sqm of landscaped open space. This space would be in the form of two communal courtyards, open areas of green space surrounding the perimeter blocks and an innerstreet running through the development. Of the 8,421 sqm, 3,816 sqm would be open to the public; anyone can use this space and walk around it. The existing surface level car parking spaces would be removed from the central open spaces of the site and consolidated into one section of the ground floor of the building, creating more verdant and pleasant external amenity spaces. The communal courtyards would serve as communal amenity space for the future occupiers and would only be accessible to residents of the development. The communal space provision would exceed the policy requirement, totalling 452sm2. In addition, each home would be provided with policy compliant private amenity space, of where there is currently a lack, on site. An 'inner street' would be created, which would replace the existing, convoluted route. The 'inner street' would run in a straight line north south, linking Aylward Street and Stepney Way. It would be legible from the street and almost entirely car free. It would provide the future residents of the estate and residents of the wider area with a safe and convenient north south route for local journeys and would promote sustainable travel. It would also be step free and suitable for those less able and wheelchair users. This inner street would also contain a pocket park, with a small area of child play space.
- 7.72 So while there would be some quantum loss of open space on the site, this would be outweighed by the enhanced quality of the provision, the variety of soft and hard landscaped areas, the provision of public, communal and private spaces and improvement to access routes. With respect to child play space, the following table provides details on the child yield generated by the proposed development and the minimum child play space requirements based on the LBTH Child Play Space calculator:

| Age group | Child yield | Child play space requirement (sqm) |
|---------------|-------------|------------------------------------|
| Under 5 years | 107 | 1072 |
| 5-11 years | 94 | 939 |
| 12+ years | 105 | 1050 |
| Total | 306 | 3062 |

Figure twelve – Child play space requirements (LBTH Child Play Space calculator)

- 7.73 As detailed above, the development is predicted to generate 306 children and therefore 3,062sqm of child play space is required, split across different age groups.
- 7.74 The proposed development would provide a total of 2000m² of child play space within Courtyard C1, the podium Courtyard C2 and the 'inner street'. This space is specially for children aged 0-11 years and would approximately meet the child play space requirement for this age bracket (2000m² would be provided versus 2011m² required by policy). All the three play spaces will be overlooked by the surrounding perimeter blocks, ensuring there is an appropriate level of surveillance. In addition, the play spaces within Courtyard C1 and Courtyard C2 would only be accessible to residents of the development, providing an

additional layer of security. Play provision for over 12's has not been provided on site. The site adjoins Stepney Green Park to the north east, with its large areas of grass, astroturf pitch and play equipment. There is also a pedestrian crossing from the site boundary, across to the north side of Stepney Way. In addition, the development would provide areas of soft and hard landscaping and safe and secure communal amenity space. Given these factors and in these specific circumstances, it is considered that the older children of the proposed development would have access to sufficient opportunities for play and activity.

- 7.75 In conclusion, the provision of open space and child play space is considered to be acceptable and would meet the needs of future residents of the site and neighbouring occupiers.

Design & Heritage

- 7.76 Development Plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.
- 7.77 London Plan (2021) policy D3 promotes the design-led to optimise site capacity. The policy requires high density development to be located in locations well connected to jobs, services, infrastructures and amenities, in accordance with London Plan (2021) D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.
- 7.78 Tower Hamlets Local Plan policy S.DH1 outlines the key elements of high-quality design so that the proposed development are sustainable, accessible, attractive, durable and well integrated into their surroundings. Complementary to this strategic policy, Local Plan policy D.DH2 seeks to deliver an attractive, accessible and well-designed network of streets and spaces across the borough.
- 7.79 The scheme was taken to the Conservation and Design Advisory Panel at the pre-application stage, and their comments were reflected in the below assessment.

Layout, landscape, public realm, movement and connectivity

- 7.80 The proposed site layout arrangement is predicated on housing blocks configured on a broadly north-south perimeter grid layout either side of an 'inner street'. There are two communal courtyards that occupy the space within the perimeter blocks. These courtyards are only accessible to residents. The site has been laid out with generous spacing between the blocks and between the built form and the boundaries of the site, creating views through and around the buildings and opportunities for pockets of landscaping.
- 7.81 The entire development, across both perimeter blocks, works hard to position active land uses, including new homes, entrance lobbies, and concierge desks, facing the street. This will represent an improvement on the existing situation, where many front doors and entrance lobbies are placed within the site away from the street. The northeast corner of the site is marked by a new Community Centre. This would give the Community Centre visibility, act as a counterpoint to Stepney Green Park on the opposite side of Stepney Way, and act as a neighbourhood landmark.
- 7.82 The disabled persons parking would be under a podium in Block B, meaning it would not be visible from the public realm and its impact on the street scene would be mitigated. The removal of the surface level parking from the central areas also creates a less cluttered and more welcoming site layout.
- 7.83 The new green route, known as the 'inner street' acts, to connect Stepney Way and Aylward Street improving connectivity in the area. Access to this street would be controlled via bollards, ensuring that vehicles, with the exception of delivery, servicing and emergency vehicles, cannot use this route. This will ensure that it acts as a pedestrian and cycling friendly route, to the benefit of the wider community.

- 7.84 The two communal gardens within the permitter blocks would benefit from adequate sunlight. The courtyard situated to the west of the site will have 50% of its area receiving more than 2 hours of direct sunlight on 21st March, while the courtyard situated to the east will have 68% of the area on the lower level and 100% of the area on the upper level receiving more than 2 hours of direct sunlight on 21st March, in excess of the BRE requirements of 50%.



Figure thirteen - Landscape plan



Figure fourteen - Unverified CGI – Street view showing Jamaica Street



Figure fifteen - Unverified CGI – street view showing Aylward Street

Height, Scale, Massing and Form

- 7.85 The proposed development is comprised of housing blocks configured over 4-8 storeys in height. The tallest blocks proposed would be similar in height to the tallest buildings on the existing site, and one of the the proposed blocks would be significantly taller than the immediate context. Higher rise elements are found along Stepney Way, defined by a series of predominantly 8-storey buildings, which are interspersed with much lower link elements to reduce the buildings' visual impact. While the opposite side of Stepney Way is much lower in scale, the width of the road and the set back of the proposals from the boundary with trees and soft landscaping, result in a scale that, though taller, sits comfortably in the townscape. In addition, the eight storey element marking the north western corner of the site reflects mirrors the eight storey building on the west side of Jamaica Street.
- 7.86 There are also taller buildings either side of the inner street, on the southern, Aylward Street side of the site. These taller elements mark the corners of the perimeter blocks and are again flanked by the lower elements. New sightlines would be created looking north up West Arbour Street and through into the 'inner street', creating an open feel to the centre of the site.
- 7.87 We particularly welcome the approach on the southern edge where the scale of the buildings responds to the scale of the nearby Albert Gardens Conservation Area. While there is a clear increase in height, scale and massing across the site, the proposals respond to the various scales of development in the area.
- 7.88 The overall distribution of height responds positively to the surrounding context. As such, officers have no concerns about the scale, height or massing of the proposals.

Appearance & Materials

- 7.89 The primary façade materials will be three main colours of brick and there will be either protruding or recessed balconies. A similar material and colour palette can be found on buildings in the surrounding area, ensuring that this development is in keeping with the

setting. A buff-grey brick will be used across the buildings at the ground floor level creating a sense of continuity across the development.

- 7.90 The character and appearance of the proposed development will vary slightly across the site responding to the location, use, the character of the proposed new street and proposed public realm. There was scope to develop the design further to better reflect the context and heritage of the area to deliver a place with a clearer identify. Nevertheless, there are some successful design features, such as the use of hit and miss brickwork across the buildings, which add a sense of fun to the design and character to the overall development.
- 7.91 On balance, whilst the design is not as characterful as it could be, there are elements of it that add character and high quality and durable materials have been used. Therefore, the overall design is considered to be acceptable.

Trees

- 7.92 The proposed development necessitates the loss of some of the existing trees and the sum effect is that 27 trees are identified for removal, 4 for pruning and 55 retained, including all Category A trees. To mitigate this loss, the scheme would provide an uplift of 92 semi-mature trees in public areas, which equates to a replanting ratio of 1:4. Our tree officer has confirmed that this approach is appropriate to mitigate the loss of existing trees. It is recommended that tree protection measures for the trees to be retained are secured by planning condition. It is also recommended that a condition reserves the detailed specification of the proposed new trees and requires that any that die within five years of planting are re-provided.

Safety & Security

- 7.93 The scheme has been designed with Secured by Design (SbD) principles in mind, as detailed in the Design and Access Statement.
- 7.94 The Met Police have confirmed that they held meetings with the project architects to discuss their intentions around security and Secured by Design, and site-specific recommendations were made during these meetings and have been incorporated as necessary.

Built Heritage

- 7.95 Statutory tests for the assessment of planning applications affecting listed buildings and conservation areas are found in Sections 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990. Section 66(1) relates to applications that affect a listed building or its setting. It requires the decision maker to: "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". Section 72(1) relates to applications affecting a conservation area. It states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". There is a presumption that development should preserve or enhance the character or appearance of conservation areas.
- 7.96 London Plan Policy HC1 and Tower Hamlets Local Plan Policy S.DH3 require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.
- 7.97 Although the application site is not within a conservation area (CA) and does not contain any listed buildings or structures it is adjacent to the Albert Gardens CA which lies directly south of the application site. Within the Albert Gardens CA lies the Grade II listed Raines Foundation School and 1-13 Arbour Square. 3-19 East Arbour Street, also to the south is locally listed.
- 7.98 Key views within the CA are identified along West Arbour Street and East Arbour Street which lead up to the application site. The submitted CGI images demonstrate that the development would not harm the setting of the CA when viewed from East Arbour Street given that the development is only visible in oblique views from the CA. Nor would the

development harm the setting of the CA when viewed from West Arbour Street; whilst the scale of the development would be greater than the built development in the existing setting this would not act as a detracting feature in the setting of the CA.

- 7.99 No harm is identified to the setting or significance of Raines Foundation School as a result of the development.
- 7.100 No harm is likely to arise to the setting or significance of 1-13 Arbour Street given the distance of the development from these buildings which would not impede the viewers ability to appreciate the special interest of their facades. In respect of locally listed 3-19 East Arbour Street, similarly no harm is likely to arise to the setting or significance of these buildings, as it would have minimal impact on the viewers ability to appreciate the special interest of the facades.
- 7.101 In conclusion, no harm is likely to arise to heritage assets or non-designated heritage assets in the vicinity of the site.

Neighbour Amenity

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

Privacy, Outlook and Enclosure

- 7.103 Particular adjacencies of note are as follows:
 - B2 and opposite block on Seagrave Close - approx. 19m
 - B3 and opposite block on Seagrove Close – approx. 19m
 - A1 and opposite block on Jamaica Street – approx. 20m
 - A5 and opposite block on Aylward Street – approx. 18m
 - B4 and opposite block on Aylward Street – approx. 20m

In relation to privacy, as set out in Policy D.DH8, a distance of approximately 18 metres between windows of habitable rooms reduces intervisibility to a degree acceptable to most people and hence these adjacencies are considered to be sufficient to protect neighbouring occupier's privacy. Similarly, the separation distances between the nearest neighbouring properties and the proposed new building are sufficient so that it is concluded that there would be no undue loss of outlook from any neighbouring windows, nor would there be any undue loss of enclosure, as experienced from any neighbouring homes or gardens, with the development in place.

Daylight, Sunlight & Overshadowing

- 7.104 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).
- 7.105 A number of residential properties surround the proposed new building. These properties were tested for daylight, sunlight and overshadowing impacts and the results submitted by the applicant in support of the application. The results have been independently reviewed on behalf of the Council by Anstey Horne.
- 7.106 For calculating daylight to neighbouring residential properties, the primary assessment is the vertical sky component (VSC) method of assessment together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be assumed. These tests measure to what extent existing windows retain the quantum daylight they currently receive.
- 7.107 BRE guidance in relation to VSC tests the amount of daylight striking the face of a window. The VSC of a window with the development in place should be at least 27%, or should not be reduced by more than 20% of its former value, to ensure sufficient light is still reaching the window. 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.

- 7.108 The NSL calculation takes into account the distribution of daylight within the room, and again, figures should not exhibit, with the development in place, 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.
- 7.109 The technical analysis within the applicant's report demonstrates that 14 residential properties were tested. These properties include 173-193 (odd nos. only) Stepney Way, 195 Stepney Way, 269-271 Stepney Way, 15-30 Welton House, 39-62 Seagrave Close, 26-38 Seagrove Close, 72-76 Aylward Street, 1-13 George Scott House, Lady Mico's Almshouses, 1-30 Clovelly Way, 73-201 Jamaica Street, 203-241 Jamaica Street, 245-247 Jamaica Street and Paymal House. A summary of results of those properties that have been assessed to have greater than negligible impacts follows below.
- 7.110 There is no definitive categorisation for impacts that exceed BRE guidelines, however the following 'significance' criteria banding is used here, when summarising the overall daylight and sunlight effects to the surrounding properties;

- 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

- 7.111 The following plan shows the location of the properties that were tested.

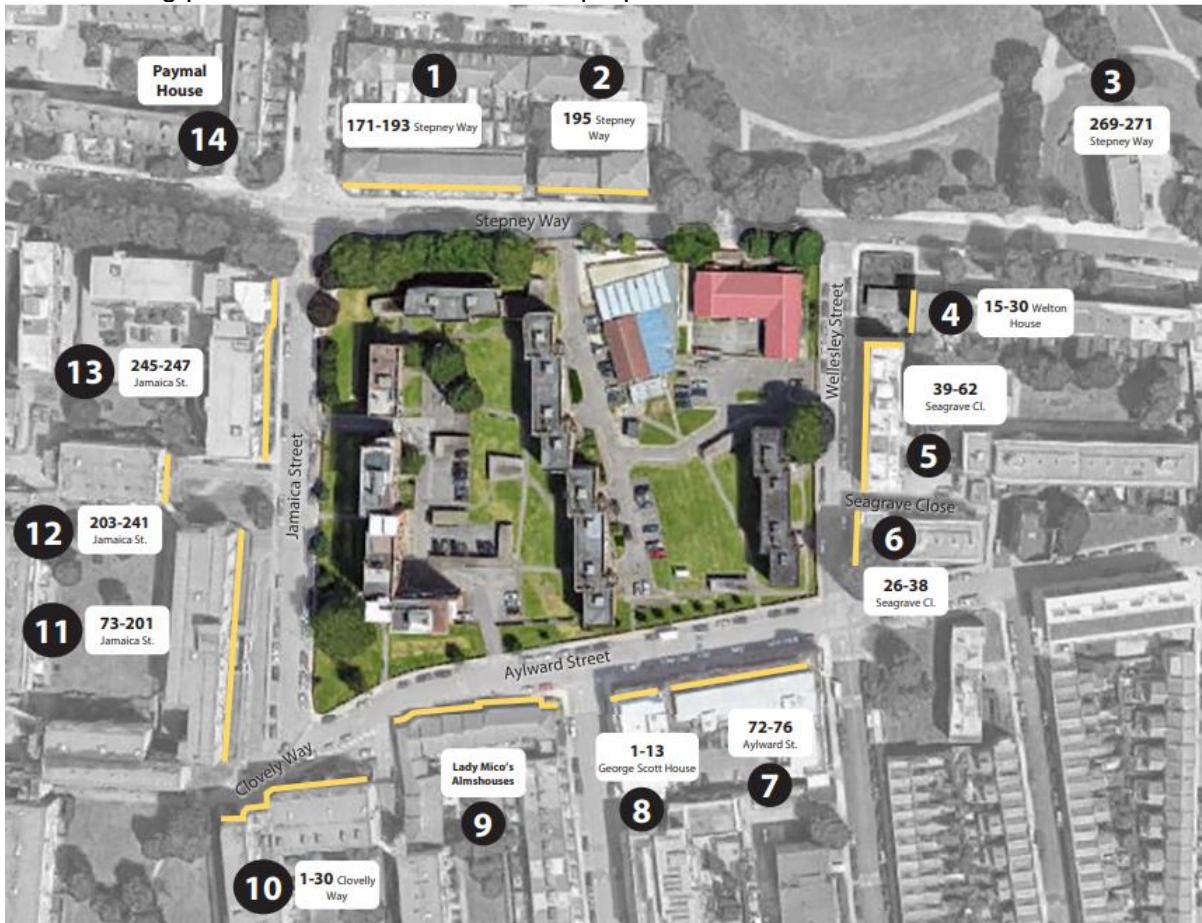


Figure sixteen – Neighbouring daylight and sunlight assessment

173-193 Stepney Way (minor to moderate adverse daylight)

- 7.112 173-193 Stepney Way is number '1' on the plan above. This property consists of a row of 3-storey terraced houses facing the proposed development. The floor plans of this development were available on LBTH's planning portal.
- 7.113 The tested windows were on the southern elevation. 45 windows were tested in total and none would meet the recommended BRE VSC guidelines, although VSC figures with the development in place did not fall below around 18%, which is not uncommon in an urban setting. NSL calculations were carried out for all 33 rooms serviced by these windows. 22 of the 33 rooms met the BRE guidelines according to this test. 11 rooms saw NSL values drop to between 64% to 73% of their former value, which is below the BRE recommended value of 80%. However, all of these rooms are kitchens and hence reduced daylight levels are considered to be more acceptable. Therefore, the proposed development would not have an unacceptable adverse impact on occupants of this property.

- 7.114 There would be no adverse impact on sunlight as a result of the proposed development.

195 Stepney Way (moderate adverse daylight)

- 7.115 This property is number '2' on the above plan, and the south facing windows were tested.

- 7.116 44 windows were tested in total for daylight impacts and it was found that 16 would meet the recommended BRE VSE guidelines. Of the remaining 28 windows, 14 belong to bedrooms that are less likely to be used during daytime, limiting the effects on occupiers, and a further 10 windows belonged to rooms that were also served by 1 or 2 other windows located on side and rear facades. NSI calculations were carried out for all 28 rooms serviced by these windows. The analysis showed that 20 out of 28 rooms have NSL ROI values that are above the BRE recommended values, with the proposed development in place. The NSL test was also found that only one room of the 28 tested would experience a major impact, and seven would experience minor impacts. The room experiencing a major impact is a bedroom, and hence is less likely to be used during the daytime, limiting the effects on occupiers. On balance, these impacts are considered to be acceptable, and the proposed development would not have an unacceptable adverse impact on occupants of 195 Stepney Way.

- 7.117 There would be no adverse impact on sunlight as a result of the proposed development.

39-62 Seagrave Close (major adverse daylight, major adverse sunlight)

- 7.118 This property is number '5' on the above plan. The windows on the west elevation were tested.
- 7.119 This property comprises a 5-storey development with a total of 25 flats. The floor plans of this development were not available either on LBTH's planning portal, nor on any property websites. A review of the windows and façades was therefore undertaken and used to make assumptions for the internal floor layouts.
- 7.120 None of the 100 windows assessed would meet the BRE 0.8 guideline using the VSC test. The NSL test was also undertaken for all 60 rooms served by these windows. The majority of rooms (40) would face negligible impacts with the proposed development in place. Of those rooms that would face impacts, only 11 rooms would face major impacts. Of these 11, only 4 would be living dining areas, and the rest would be bedrooms. On balance, the losses to this building are considered to be acceptable and would only impact a minority of rooms.
- 7.121 25 living dining rooms, served by 60 windows, were analysed for sunlight impacts. Of these 60 windows, only 7 windows would be compliant with BRE recommended values for APSH and only 22 windows would have winter PSH values that meet the BRE recommended values with the development in place. Whilst there will be a reduction in sunlight to this property, the reduction is expected for a development of this size and can be partially explained by the presence of balconies on the existing property.

26-38 Seagrave Close (minor adverse daylight)

- 7.122 This property is number '6' on the above plan. The windows on the west elevation were tested.

- 7.123 This property comprises a 3-storey development with a total number of 3 flats; each flat occupying a whole floor. The floor plans of this development were not available either on LBTH's planning portal, nor on any property websites. A review of the windows and façades was therefore undertaken and used to make assumptions for the internal floor layouts.
 - 7.124 All 12 windows facing the proposed development were tested. All of the 12 windows would not comply with BRE recommended value using the VSC test. However, NSL calculations were also undertaken for all the 9 rooms served by the windows. this analysis shows that all the rooms have retain more than 80% of their former value and meet the BRE NSL criteria, with the proposed development in place. Therefore, it is considered that occupiers of this property would not suffer undue adverse daylight impacts as a result of the proposed development.
- 7.125 There would be no adverse impact on sunlight as a result of the proposed development.

72-76 Aylward Street (moderate adverse daylight)

- 7.126 This property is number '7' on the above plan. The windows on the north elevation were tested.
- 7.127 This property comprises a 5-storey development, including a basement. It occupies two sides of the urban block which is defined by Aylward Street and East Arbour Street. A total of 9 flats are located on the façade facing the proposed development. The floor plans of this development were available on LBTH's planning portal.
- 7.128 Overall, 98 windows were assessed for daylight impacts using the VSC methodology. 49 of these windows would have ROI values that are above the recommendation of BRE. NSL calculations were also undertaken for all 47 rooms serviced by these windows. 36 of the rooms assessed using NSL would experience a negligible effect. Of the 11 rooms that did not meet the BRE recommended levels, 5 are bedrooms which the BRE Guidance classifies as 'less important'. Of the 6 Living-Kitchen-Dining rooms that do not meet the BRE recommended daylight levels, only 2 of these would suffer major adverse impacts. Both of these rooms would remain over 50% well lit, which is considered to be acceptable.
- 7.129 There would be no adverse impact on sunlight as a result of the proposed development.

1-13 George Scott House (moderate adverse daylight)

- 7.130 This property is number '8' on the above plan. The windows on the north elevation were tested.
- 7.131 This property comprises a 5-storey development and is located on the corner of Aylward Street and West Arbour Street, south of the proposed development. The floor plans of this development were available on LBTH's planning portal.
- 7.132 34 windows were tested, using VSE methodology, and 22 rooms were tested, using NSL methodology. Overall, 13 of the windows assessed would experience a negligible impact. Using the VSC test one window will experience minor impacts, seven moderate impacts and 13 major impacts. For daylight distribution, using the NSL test, five rooms will experience minor impacts, one a moderate impact and one a major impact. However, even the room suffering from major adverse impacts would remain over 53% well-lit, which is considered acceptable.
- 7.133 There would be no adverse impact on sunlight as a result of the proposed development.

Lady Mico's Almshouses (moderate to major adverse daylight)

- 7.134 This property is number '9' on the above plan. The windows on the north elevation were tested.
- 7.135 This property comprises a 2-storey development occupying three sides of the block located south of the proposed development. The floor plans of this development were not available either on LBTH's planning portal, nor on any property websites. A review of the windows and façades was therefore undertaken and used to make assumptions for the internal floor layouts.

- 7.136 20 windows were assessed for daylight impacts using VSE methodology. Overall, 4 of the windows assessed will experience a negligible effect as a result of the proposed development and the rest will experience adverse effects. However, an analysis of the results shows that none of these windows received enough daylight, even in the existing scenario, as some of it was blocked by the pitched roof and the balconies that block some of the view of the sky. Therefore, it is not considered that the proposed development would materially impact upon the daylight reaching these windows.
- 7.137 NSL calculations were also undertaken for all 11 rooms served by these windows. The results show that with the proposed development in place, only 3 of these rooms would meet the BRE recommended values. The 8 rooms that would not meet the BRE recommended values are kitchens. Lower levels of daylight are considered to be more acceptable in kitchens than living-dining areas. Given this, it is considered that the loss of daylight as a result of the proposed development would not have unacceptable adverse impacts on the occupiers of Lady Mico's Almshouses.

- 7.138 There would be no adverse impact on sunlight as a result of the proposed development.

245-247 Jamaica Street (moderate to major adverse daylight, major adverse sunlight)

- 7.139 This property is number '13' on the above plan. The windows on the east elevation were tested.
- 7.140 This property is composed of two blocks that occupy the corner of Jamaica Street and Stepney Way. The development varies between 6 and 8 storeys.
- 7.141 101 windows were tested for daylight using the VSE methodology, and of these 30 would experience negligible effects. 77 rooms were tested for daylight using NSL methodology and it was found that 32 of the rooms will experience a negligible effect. The majority of adverse impacts occur to rooms identified as bedrooms, which do not tend to be occupied during the day. In addition some of the adverse impacts to windows could be partially attributed to the presence of balconies. Given this, officers do not feel that the proposed development would result in unacceptable amenity impacts to occupiers of 245-247 Jamaica Street.
- 7.142 37 windows in total that were analysed for sunlight impacts from the proposed development. Of the 37 windows, 8 windows are north-facing. An analysis of the results suggests that of the remaining 29 windows, only 6 windows have annual and winter PSH values that are above the BRE recommended values of 80%, with the proposed development in place.
- 7.143 The reduction in sunlight levels can be partially attributed to the presence of balconies on the existing surrounding properties. In addition, for many of the rooms the APSH values were already very low, e.g. 10-16, this means that the % loss of sunlight looks greater in percentage terms. Given this, it is considered that the proposed development, would not result in an unacceptable loss of sunlight to occupiers of 245-247 Jamaica Street.

Overshadowing impact

- 7.144 A total of 12 outdoor spaces have been assessed. All 12 of the assessed outdoor spaces adhere to the BRE 0.8 guideline and therefore a negligible effect on overshadowing to neighbouring amenity is anticipated.

Conclusion

- 7.145 The proposed development would result in some adverse daylight and sunlight impacts to neighbouring occupiers. Any scheme of this type, involving the densification of an existing site, would lead to some level of adverse impacts. The adverse impacts seen in this case are limited to a small number of properties and overall, the proposed development is not considered to result in unacceptable adverse daylight, sunlight and overshadowing impacts to neighbouring occupiers.

Noise & Vibration

- 7.146 The Council's Environmental Health Officers have reviewed the submitted Noise Assessment Report, prepared by Adnitt Acoustics. Subject to details being submitted via

condition regarding the noise levels from the plant and restrictions on demolition and construction activities, there are no objections to the proposed development.

- 7.147 The community space would be on the south eastern corner of the site. A condition would be levied, requiring suitable noise mitigation measures to be implemented so that noise from this space is kept within acceptable levels.

Construction Impacts

- 7.148 Demolition and construction activities are likely to cause additional noise and disturbance to the surrounding area and to neighbouring occupiers, including additional traffic generation and dust. The construction programme is anticipated to start in November 2022 with completion of the first phase construction in 2025 and second phase construction in 2028/29. Details for minimising these impacts would be provided via condition for the submission of Construction Environmental Management and Logistics and Plan.
- 7.149 In addition, in accordance with the Planning Obligations SPD, conditions would be secured towards development co-ordination and integration.

Transport

- 7.150 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.

Vehicular, pedestrian and cycle access

- 7.151 To encourage walking and cycling and allow play, the inner street would become a shared street, with vehicular access limited to emergency vehicles, occasional deliveries and refuse collections. It will be closed to all other traffic and will operate as a one-way northbound route for the permitted through movements with access from Aylward Street to the south. There would be play spaces and a pocket park to improve the quality of the public realm and encourage people to use this walking route.

Deliveries & Servicing

- 7.152 It is proposed that servicing takes place both within the site via the inner street and from the public highway.
- 7.153 The inner street would become a shared street, with vehicular access limited to refuse vehicles, emergency vehicles and the occasional delivery vehicles (beyond the 2 accessible parking spaces). This new central road will accommodate bollards at the middle third of the access road to prevent vehicles from utilising this access as a cut through, the bollards will be droppable to enable refuse and emergency vehicles to serve the site via the central access road. In addition, the inner street will comprise two internal turning heads which allow for vehicles up to the size of a 4.6t van to enter the site, turn within the manoeuvring space and exit back onto the public highway. This will reduce risks of collisions and/or additional congestion resulting from reversing vehicles.
- 7.154 The residential properties fronting the public highway will continue to be serviced by delivery vehicles stopping on-street along yellow line restrictions on one of the frontages to Stepney Way, Wellesley Street, Aylward Street and Jamaica Street.
- 7.155 The community space will receive its deliveries on-street and will be controlled by a member of staff to ensure the smooth operation of deliveries, servicing and waste collection.
- 7.156 It is recommended that a full delivery and servicing plan is secured by condition.

Car Parking

- 7.157 London Plan Policy T6.1 requires residential developments with PTAL 4 and 5 for inner London should be car-free. The policy requires the provision of disabled persons parking for new residential developments ensuring 3% provision from the outset with additional 7% to be provided upon request. The policy also states that new residential car parking spaces

should provide at 20% of active charging facilities with passive provision for all remaining spaces.

- 7.158 Tower Hamlets Local Plan policy D.TR3 requires all residential developments to be permit free and that all parking associated with the development should be provided off-street.
- 7.159 The proposed scheme incorporates 34 disabled persons parking spaces (32 within the car park; and 2 along the internal road). This amounts to one space per each of the 34 wheelchair accessible units. Given that any addition provision on site would be at the expense of open space, play space and public realm this level of provision is judged to be appropriate.
- 7.160 In accordance with London Plan policy, a condition will be secured requiring that 7 of the car parking spaces would have Electric Vehicle Charging Points (EVCPs) and the rest would have passive provision for EVCPs.
- 7.161 As a result of the permit transfer scheme, the 129 properties will be eligible to obtain a permit to park on-street within the local Controlled Parking Zone (CPZ) 'C3'. The remaining homes within the proposals will be subject to permit-free agreement with LBTH, in accordance with relevant London Plan and Local Plan policy. This increase in on street car parking as a result of the permit transfer scheme may lead to increased parking congestion. This is considered to be an unavoidable impact of the scheme and this congestion will inevitably reduce in time as permit holders move from the site and new dwellers move in who do not hold permits.
- 7.162 A car parking management plan will be secured by condition detailing how parking bays will be allocated and how the inner street will be kept clear of unauthorised parking.

Cycle Parking and Facilities

- 7.163 London Plan Policy T5 would require 771 long-stay cycle parking spaces to be provided for residential use and 12 short-stay cycle parking spaces. The scheme would provide 790 long stay spaces, exceeding policy requirements. The proposed community space would be provided with 3 long-stay stands. There would also be 28 short stay cycle parking spaces in the public realm.
- 7.164 Details of the short stay cycle parking, in terms of where the cycle stands would be located, has not yet been provided. A condition would be secured requiring this information to be provided.
- 7.165 All the long stay parking would be in secure, sheltered communal cycle storerooms – with the exception of three units that would have private sheltered cycle stores. Cycle parking is provided at ground floor level in each of the housing blocks with 'Block B2' also incorporating stores located on each of the upper floors, which would be served by a larger lift in accordance with London Cycling Design Standards. The cycle parking would be in the form of either Sheffield stands or two tier stands; both these types of stands comply with London Cycling Design Standards.
- 7.166 In conclusion, the cycle parking provision proposed meets the minimum requirements set out in the London Plan and has been designed in accordance with London Cycling Design Standards.



Figure seventeen - Proposed cycle storage and car parking provision

Travel Planning

- 7.167 A framework travel plan has been provided. The final Travel Plan should be secured and monitored via a condition.

Environment

Environmental Impact Assessment

- 7.168 An Environmental Impact Assessment Screening Opinion was issued for the proposed development confirming that the proposed development is unlikely to have significant environmental effects and as such, an EIA was not required for the proposed development.

Energy & Environmental Sustainability

- 7.169 Generally, a decarbonisation agenda has been adopted at all planning policy levels. 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), and

- Use Renewable Energy (Be Green)
- Monitor, verify and report on energy performance (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 with the remainder to be offset with cash payment in lieu.
- 7.171 The proposed energy strategy includes energy efficiency measures, air source heat pumps and the installation of PV arrays, which would result in a 72% reduction in carbon emissions compared to the GLA's SAP10 baseline. This exceeds the minimum 35% (London Plan) and 45% (THLP) carbon reduction policy requirements.
- 7.172 In general, the proposed energy strategy and identified measures for carbon emissions reduction are considered acceptable. In particular, officers are supportive of the air source heat pump solution (heating and hot water) as this is an electrical based system that can take advantage of the decarbonised grid in the future. A cash payment in lieu for the remainder of the carbon emissions reduction would be secured via a condition.
- 7.173 As requested by the Council's energy officers, a condition will be secured to ensure that the community floorspace within the proposed development achieves BREEAM 'Excellent' rating.
- 7.174 In relation to the 'Be Seen' element of the energy hierarchy, smart meters (energy display devices) will be installed in each home, allowing residents to monitor and reduce their energy use. It is recommended that a planning obligation requires the development owner to submit monitoring results to the GLA (in accordance with the Mayor of London's draft guidance).

Air Quality

- 7.175 London Plan policy SI1 and Tower Hamlets Local Plan policy D.ES2 require major developments to submit an Air Quality Assessment demonstrating to meet or exceed at least Air Quality Neutral standard.
- 7.176 The application is accompanied by an Air Quality Assessment which has been reviewed by the Council Environmental Health Air Quality Officer. The assessment concludes that the proposed development would be air quality neutral, in accordance with planning policy. Given that the proposed development would rely on air source heat pumps there would be no NOx emissions associated.
- 7.177 The mitigation measures to prevent dust nuisance and air pollution during construction and the life of the development would be secured via a condition, as requested by the Council's air quality officer.

Wind/Microclimate

- 7.178 The application was supported with the submission of an Environmental Wind Planning Report prepared by Arup. This report assesses windiness levels for the completed development (Phase 2) and for Phase 1.
- 7.179 Overall, the wind conditions around the completed development are expected to be suitable for their particular uses. In particular, the Block A Courtyard, which is the green space expected to be most affected by winds, would likely experience 'strolling' conditions in the worst season and allow for 'standing' levels in summer months.
- 7.180 Wind conditions around newly developed blocks in Phase 1 would be acceptable for access use. However, a number of mitigation measures would need to be implemented to ensure this. Therefore, a condition will be secured relating to wind mitigation that should be implemented to ensure wind conditions are acceptable for residents and other users of the site.

- 7.181 On balance, with appropriate mitigation measures in place, the proposed wind and microclimate within the proposed development and the surrounding area is considered acceptable and in accordance with the planning policy requirements.

Waste

- 7.182 Policy D.MW3 of the Local Plan (2020) requires adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements.
- 7.183 Each housing block would be serviced by a bin store at the ground floor level. These bin stores are each located in close proximity / adjacent to the main entrance to the blocks but cannot be accessed from the internal core, due to fire safety reasons. Residents would be responsible for taking their waste/recycling to a bin store. There will be an onsite management to move the bins from the store to the collection point.
- 7.184 The maisonettes on Stepney Way would have their own dedicated bin stores in their front gardens and would be serviced directly from the street.
- 7.185 Bulky waste would not be stored in a separate store. Instead, bulk waste will be left in the bin stores and collected by on-site management.
- 7.186 A Site Waste Management Plan will be secured by a planning condition. As part of this condition the applicant would be required to provide addition information in relation to the bulky waste storage management plan, the onsite management of bins and the communication strategy for waste management.

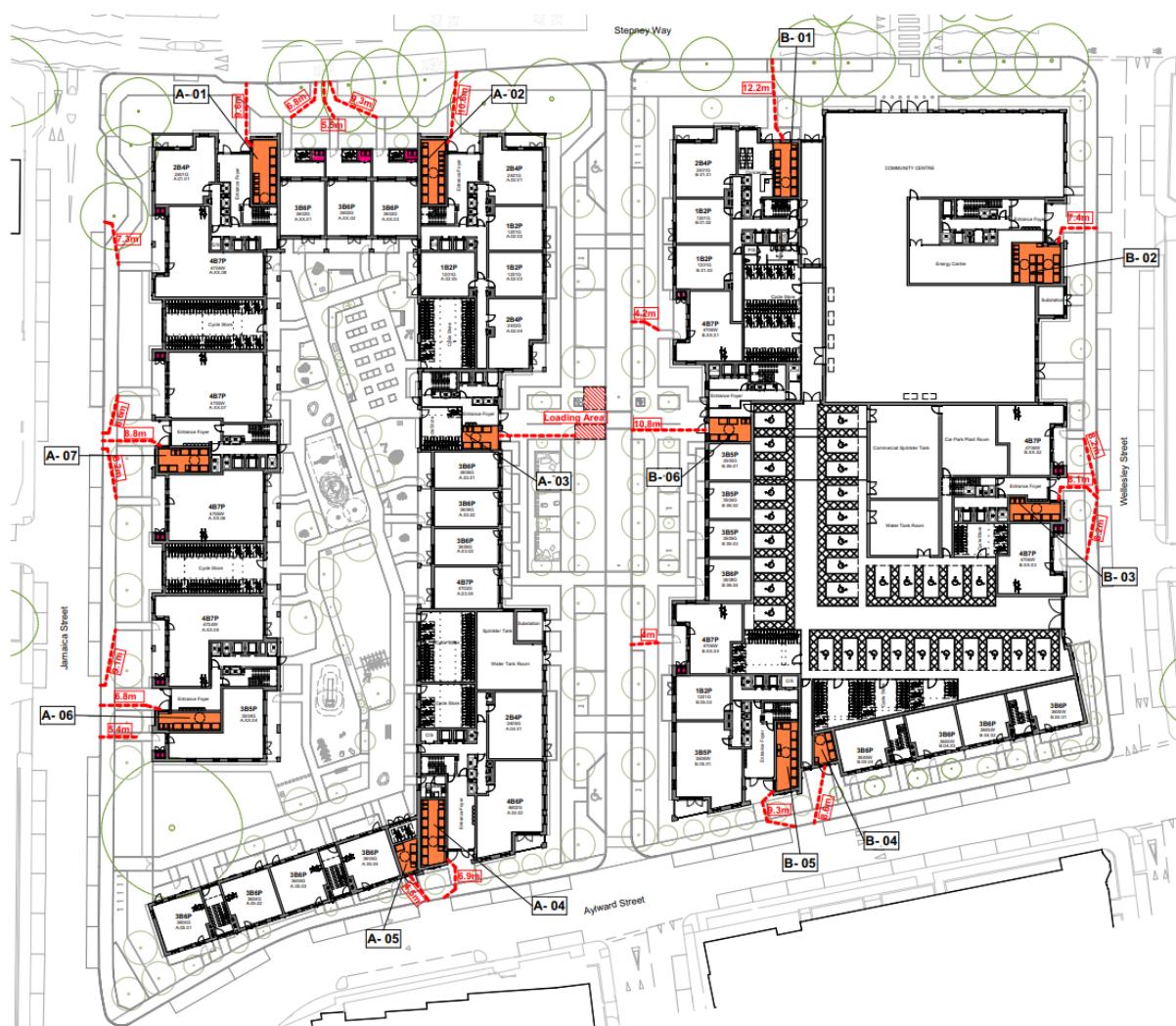


Figure eighteen - Proposed Refuse Strategy

Biodiversity and Urban Greening

- 7.187 London Plan policy G6 and Tower Hamlets Local Plan D.ES3 require developments to protect and enhance biodiversity. Policy D.ES3 requires major development to deliver net gains in biodiversity that contribute to objectives in the Local Biodiversity Action Plan. Policy G5 of the London Plan requires that major development proposals contribute to the greening of London by including urban greening as a fundamental element of site and building design
- 7.188 The application site consists of existing buildings and surrounding green space, which is largely amenity grassland with scattered trees, shrubbery and a small wildflower patch. Most of the trees will be retained. However, 28 trees, over half of which are native species, would be lost along with the rest of the existing planting.
- 7.189 The proposed development would retain the Category A (London Plane) tree on Jamaica Street and there would also be a proposed re-planting ratio of 1:4. Therefore, it is considered that the biodiversity loss associated with the loss of 28 trees, including 3 large Category B trees, would be adequately mitigated.
- 7.190 The biodiversity enhancements as part of the proposed development include the provision of green roofs over most of the roof area of the new buildings and ground level landscaping. Officers consider, pending details on the type of green roof proposed, that there would be a net gain in biodiversity as a result of the development as required by D.ES3.
- 7.191 Biodiverse roofs, as well as other biodiversity enhancements such as nectar rich plants, bat boxes and native tree species will be secured via condition. These will all contribute to Local Biodiversity Action Plan targets, in accordance with the planning policy. In addition, a condition requiring the removal of Japanese knotweed, an invasive species found on the site, will be levied.
- 7.192 The applicant has calculated the urban greening factor (UGF) score of the proposed development as 0.44 which exceeds the target set by London Plan Policy G5. The proposed development is therefore fully compliant with Policy G5 of the London Plan and therefore welcomed.
- 7.193 In conclusion, the proposed scheme would meet the relevant biodiversity and urban greening targets set out in policy.

Flood Risk & Drainage

- 7.194 London Plan Policy SI13 sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.195 Tower Hamlets Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drainage Systems protected to a very high standards by the Thames tidal flood defences up to a 1 in 1000 (0.1%) change in any given year. Policy D.ES6 requires new development to minimise the pressure on the combined sewer network.
- 7.196 The development site is located within flood zone 1 and therefore has no significant risk of tidal or fluvial flooding. There are surface and ground water flooding risks associated within the wider catchment area. The development proposes to reduce the overall flood risk for the development by raising existing ground levels throughout the site by 0.3m, resulting in a finished ground level of 10.5AOD.
- 7.197 The drainage strategy sets out proposals to limit surface water discharge in line with the sites greenfield run off rate and sets a discharge rate of 13l/s for the whole site (1.67ha) in a 1 in 100year + 40% storm event and will incorporate onsite storage of 1,201m³ provided by attenuation tanks. Thus, providing a 97% betterment from the existing site discharge rate of 421.4l/s. Therefore, the proposed drainage plan will go towards reducing the peak demand on the drainage network within this area, as the site will provide extensive betterment over the existing situation. The site will be split into 3 separate drainage catchment areas all draining independently and will be split as such: West Block A, East Block B and Inner Street. Each section will consist of one outfall connection with a flow control device,

discharging to the Thames Water combined sewers around the site. Therefore, the drainage strategy and the proposed discharge rate is accepted in principle.

- 7.198 In regard to the sustainable urban drainage features, there is a lack of consistency between the features proposed in the reports and the plans. The reports make reference to intentions to incorporate a swale, a variety of rain gardens, sections of permeable paving and green roofs, but these features have not been committed to. Therefore, a condition will be secured requiring a detailed surface water drainage scheme and SuDs hierarchy assessment.
- 7.199 In conclusion, the flood risk and drainage strategy would be acceptable in principle. However, further information is needed in regard to the SuDs and hence an appropriate condition will be secured.

Land Contamination

- 7.200 The application has been reviewed by the Council's Environmental Health Contaminated Land Officer. Subject to the inclusion of standard pre-commencement and pre-occupation condition, the proposal is considered acceptable and in accordance with Tower Hamlets Local Plan policy D.ES8.

Health Impact Assessment

- 7.201 London Plan GG3 requires developments to assess their potential impacts on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments (HIAs). Tower Hamlets Local Plan D.SG3 requires major developments referable to the GLA to provide an HIA.
- 7.202 The application is supported by an HIA. It is noted that the site has strong potential to offer health benefits to the residents which is welcomed.

Infrastructure Impact

- 7.203 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £1,561,242.70 (inclusive of social housing relief and exclusive of indexation) and Mayor of London CIL of approximately £704,236.92 (inclusive of social housing relief and exclusive of indexation).
- 7.204 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.
- 7.205 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD (2021), as follows:
- £180,640 towards construction phase employment skills training
 - £381,022 toward carbon emission off-setting.
- 7.206 The following non-financial obligations will also be secured:

1. Housing

Reprovision of 70 units of housing; 34 Resident Leaseholder (RL) properties (as shared equity units) and the 36 Secure Tenant (ST) properties.

42% of affordable housing by habitable room (excluding reprovision):

- 22 units (73 habitable rooms) at London Affordable Rent
- 68 units (323 habitable rooms) at Tower Hamlets Living Rent
- 20 units (60 habitable rooms) as Shared Ownership
- Early, Mid and Late Stage Review
- Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to M4 (3)(2)(b) standard)

2. Access to Employment

- 20% local procurement during the construction phase
- 20% local labour in construction
- 29 construction phase apprenticeships

3. Transport Matters

- Car Free development (residential)
- Approval and implementation of Car Park Management Plan (including for increasing on-street provision of accessible car parking spaces)
- Travel Plans
- Scheme of Highway Works
- Public access to the inner street

4. Compliance with Considerate Constructors Scheme

Human Rights & Equalities

- 7.207 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.
- 7.208 Given the nature of the proposed estate regeneration scheme, particular attention should be given to the displacement of existing residents. As outlined elsewhere in this report, the applicant has pro-actively engaged with the existing residents throughout the whole process. A decant strategy, including rehousing residents has been secured which ensures that there would be no adverse impact to the existing residents' housing situation.
- 7.209 The proposed new residential accommodation would meet inclusive design standards and 34 of the new homes would be wheelchair accessible, 24 within the affordable rented tenure and 10 within the private sector (with the affordable rented homes to be built to 'fit out' standard). This would benefit future residents, including disabled people, elderly people and parents/carers with children.
- 7.210 The application has undergone the appropriate level of consultation with the public and Council consultees. The applicant has also carried out an extensive engagement with the exiting residents on site.
- 7.211 The proposed affordable housing would be of particular benefit to groups that are socially/economically disadvantaged.
- 7.212 The proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

- 8.1 That subject to any direction by the Mayor of London, **conditional planning permission is GRANTED** subject to the following planning obligations.

8.2 Conditions

Compliance

1. 3 years deadline for Commencement of Development.
2. Development in Accordance with Approved Plans.
3. Personal Permission.
4. 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.
- 5. Amplified noise
- 6. Hours of use
- 7. Inclusive access
- 8. External Lighting.
- 9. Plant
- 10. No plant on roof
- 11. No pipes on building face
- 12. Tree protection
- 13. Cycle Parking
- 14. Wheelchair Accessible Units

Pre-Commencement

- 15. Dust Management Plan & PM10 Monitoring
- 16. Stage 1 RSA for Inner Street
- 17. Wind mitigation
- 18. Financial contributions
- 19. Non-Financial Contributions (relating to housing, transport and employment)
- 20. Early-stage viability review
- 21. Biodiversity mitigation and enhancement
- 22. Control of invasive species
- 23. Contaminated land
- 24. Construction Environmental Management and Logistics Plan
- 25. Archaeology
- 26. Construction Plan and Machinery (NRMM)
- 27. Piling

Pre- Superstructure Works

- 28. Water efficiency
- 29. Highway works (s278)
- 30. Ventilation Strategy
- 31. SUDS
- 32. Details of Landscaping
- 33. Communal Amenity Space and Child's Play Space
- 34. External Facing Materials

Pre-Occupation

- 35. Phasing management strategy
- 36. Phase 1 – noise mitigation measures
- 37. Phase 2 – noise mitigation measures
- 38. Car-free
- 39. Phase 1 - waste management plan
- 40. Phase 2 – waste management plan
- 41. Travel plan
- 42. Water network infrastructure
- 43. Accessible Car Parking and Cycle Parking, EVCP and Parking Management Plan
- 44. Energy and Efficiency standards
- 45. Delivery and servicing
- 46. Secured by design accreditation
- 47. Circular economy post-completion
- 48. Permit free agreement

1. Development is Liable for CIL
2. Street Naming and Numbering
3. Thames Water - Groundwater Risk Management Permit, minimum pressure/flow rate.
4. Building Control
5. S278
6. Fire and Emergency
7. Footway and Carriageway
8. Hours of Work for Demolition and Construction Activities
9. Designing out Crime

APPENDIX 1

LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

Proposed ground floor plan – CER-PRP-MP-00-DR-A-02210 P3
Proposed first floor plan - CER-PRP-MP-01-DR-A-02211 P1
Proposed second floor plan - CER-PRP-MP-02-DR-A-02212 P1
Proposed third floor plan - CER-PRP-MP-03-DR-A-02213 P1
Proposed fourth floor plan - CER-PRP-MP-04-DR-A-02214 P1
Proposed fifth floor plan – CER-PRP-MP-05-DR-A-02215 P1
Proposed sixth floor plan - CER-PRP-MP-06-DR-A-02216 P1
Proposed seventh floor plan - CER-PRP-MP-07-DR-A-02217 P1
Proposed roof plan - CER-PRP-MP-08-DR-A-02218 P2
Site location plan - CER-PRP-MP-XX-DR-A-02100 P0
Existing site plan - CER-PRP-MP-XX-DR-A-02101 P0
Existing site elevations – sheet 1 - CER-PRP-MP-XX-DR-A-02102 P0
Existing site elevations – sheet 2 - CER-PRP-MP-XX-DR-A-02103 P0
Proposed site plan - CER-PRP-MP-XX-DR-A-02200 P2
Proposed demolition plan - CER-PRP-MP-XX-DR-A-02201 P0
Proposed phasing plans - CER-PRP-MP-XX-DR-A-02202 P2
Proposed gross internal areas - CER-PRP-MP-XX-DR-A-02203 P2
Proposed elevations – Jamaica Street & Stepney Way - CER-PRP-MP-XX-DR-A-02300 P2
Proposed elevations – Wellesley Street & Aylward Street - CER-PRP-MP-XX-DR-A-02301 P2
Proposed elevations – Inner Street - CER-PRP-MP-XX-DR-A-02302 P2
Proposed elevations – Block A courtyard - CER-PRP-MP-XX-DR-A-02303 P1
Proposed elevations – Block B courtyard - CER-PRP-MP-XX-DR-A-02304 P1
Proposed site sections – sheet 1 - CER-PRP-MP-XX-DR-A-02305 P1
Proposed site sections – sheet 2 - CER-PRP-MP-XX-DR-A-02306 P1
Proposed site elevations – sheet 1 - CER-PRP-MP-XX-DR-A-02307 P2
Proposed site elevations – sheet 2 - CER-PRP-MP-XX-DR-A-02308 P2
Proposed refuse strategy - CER-PRP-MP-XX-DR-A-02400 P1
Proposed cycle storage - CER-PRP-MP-XX-DR-A-02401 P3
Unit type 1201G - CER-PRP-MP-XX-DR-A-U1201 P2
Unit type 1202G - CER-PRP-MP-XX-DR-A-U1202 P2
Unit type 2301G - CER-PRP-MP-XX-DR-A-U2301 P2
Unit type 2401G - CER-PRP-MP-XX-DR-A-U2401 P2
Unit type 2402G - CER-PRP-MP-XX-DR-A-U2402 P2
Unit type 2403G - CER-PRP-MP-XX-DR-A-U2403 P2
Unit type 2404G - CER-PRP-MP-XX-DR-A-U2404 P1
Unit type 2405G - CER-PRP-MP-XX-DR-A-U2405 P1
Unit type 3501G - CER-PRP-MP-XX-DR-A-U3501 P2
Unit type 3502G - CER-PRP-MP-XX-DR-A-U3502 P2
Unit type 3503G - CER-PRP-MP-XX-DR-A-U3503 P2
Unit type 3504G - CER-PRP-MP-XX-DR-A-U3504 P2
Unit type 3505G - CER-PRP-MP-XX-DR-A-U3505 P2
Unit type 3507G - CER-PRP-MP-XX-DR-A-U3507 P1
Unit type 3601G - CER-PRP-MP-XX-DR-A-U3601 P2
Unit type 3602G - CER-PRP-MP-XX-DR-A-U3602 P2
Unit type 3603G - CER-PRP-MP-XX-DR-A-U3603 P2
Unit type 3604G - CER-PRP-MP-XX-DR-A-U3604 P2
Unit type 3606G - CER-PRP-MP-XX-DR-A-U3606 P2
Unit type 3607G - CER-PRP-MP-XX-DR-A-U3607 P2
Unit type 3608G - CER-PRP-MP-XX-DR-A-U3608 P2
Unit type 4601G - CER-PRP-MP-XX-DR-A-U4601 P2
Unit type 4602G - CER-PRP-MP-XX-DR-A-U4602 P1
Unit type 4701G - CER-PRP-MP-XX-DR-A-U4701 P2
Unit type 4702G - CER-PRP-MP-XX-DR-A-U4702 P2
Unit type 4703G - CER-PRP-MP-XX-DR-A-U4703 P2
Unit type 4707G - CER-PRP-MP-XX-DR-A-U4707 P1

Landscape ground floor GA – CER-PRP-ZZ-00-DR-L-2001 P1
Landscape podium GA - CER-PRP-ZZ-00-DR-L-2002 P0
Landscape masterplan - CER-PRP-ZZ-00-DR-L-2000 P1
Vehicle swept path analysis – TR005 A

Other application documents

Accommodation schedule
Be Green BRUKL
Be Lean BRUKL
Clichy Estate Be Seen spreadsheet V2
Detailed circular economy statement
Fire Statement form
GHA overheating in new homes tool
GLA CO2 Emissions rev 01
Private amenity space provision
SuDs Proforma
Design and Access Statement – Part 1,2,3,4
Overshadowing Impact Assessment Part 1 and Part 2
Daylight and Sunlight Proposed Design
Daylight and Sunlight Proposed Design – Part 2, 3, 4, 5
Flood Risk Assessment Part 1 and Part 2
Planning Statement
Air Quality Assessment
Arboricultural Impact Assessment
BREEAM pre-assessment
Circular Economy Statement
Delivery and Servicing Plan
Desk Study and Ground Investigation Report – Part 1,2,3 and 4
Detailed unexploded ordnance (UXO) Risk Assessment
Energy strategy report
Environmental wind planning report
Equality impact assessment
Framework BREEAM travel plan
Health Impact Assessment
Heritage Impact Assessment
Landscape Statement – Part 1,2,3,4,5,6,7,8,9,10,11,12
Noise assessment report – Part 1,2,3
Outline construction logistics plan
Planning fire statement
Preliminary ecological appraisal
Proposed decant strategy
Statement of Community Involvement
Summer Overheating Assessment
Sustainable Design and Construction Statement
Transport Assessment
Proposed Refuse Strategy
Vehicle Swept Path

APPENDIX 2

SELECTION OF APPLICATION PLANS AND IMAGES



Site layout with landscaping



1 Jamaica Street Elevation



2 Steepney Way Elevation



3 Wellesley Street Elevation



4 Ayward Street Elevation

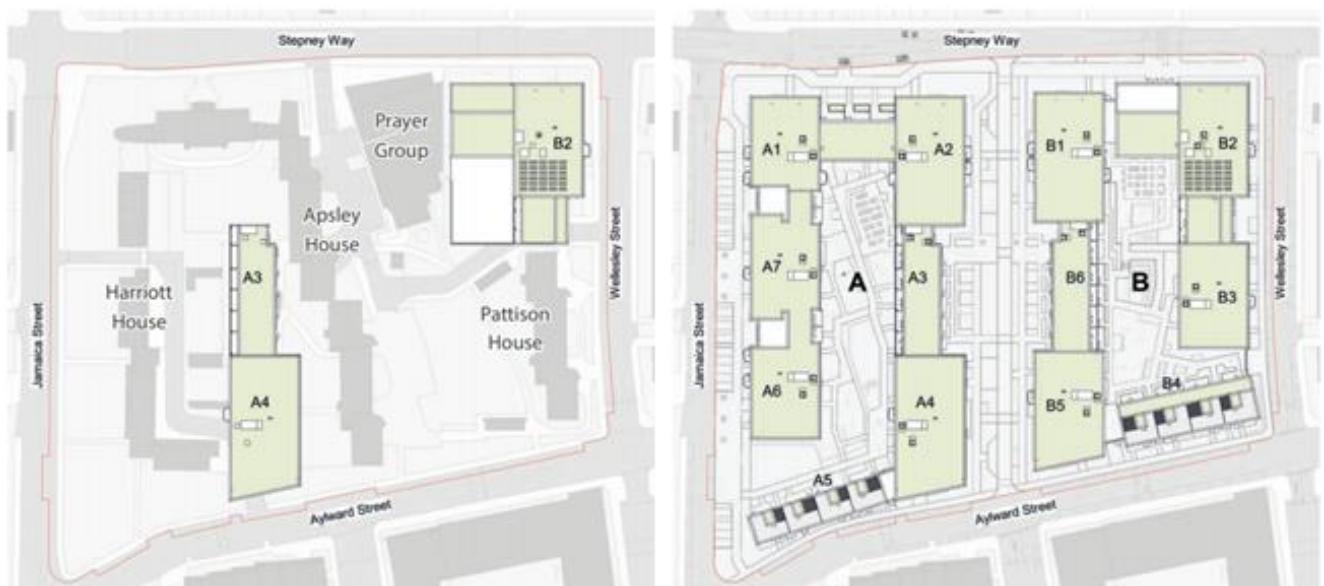
Elevations



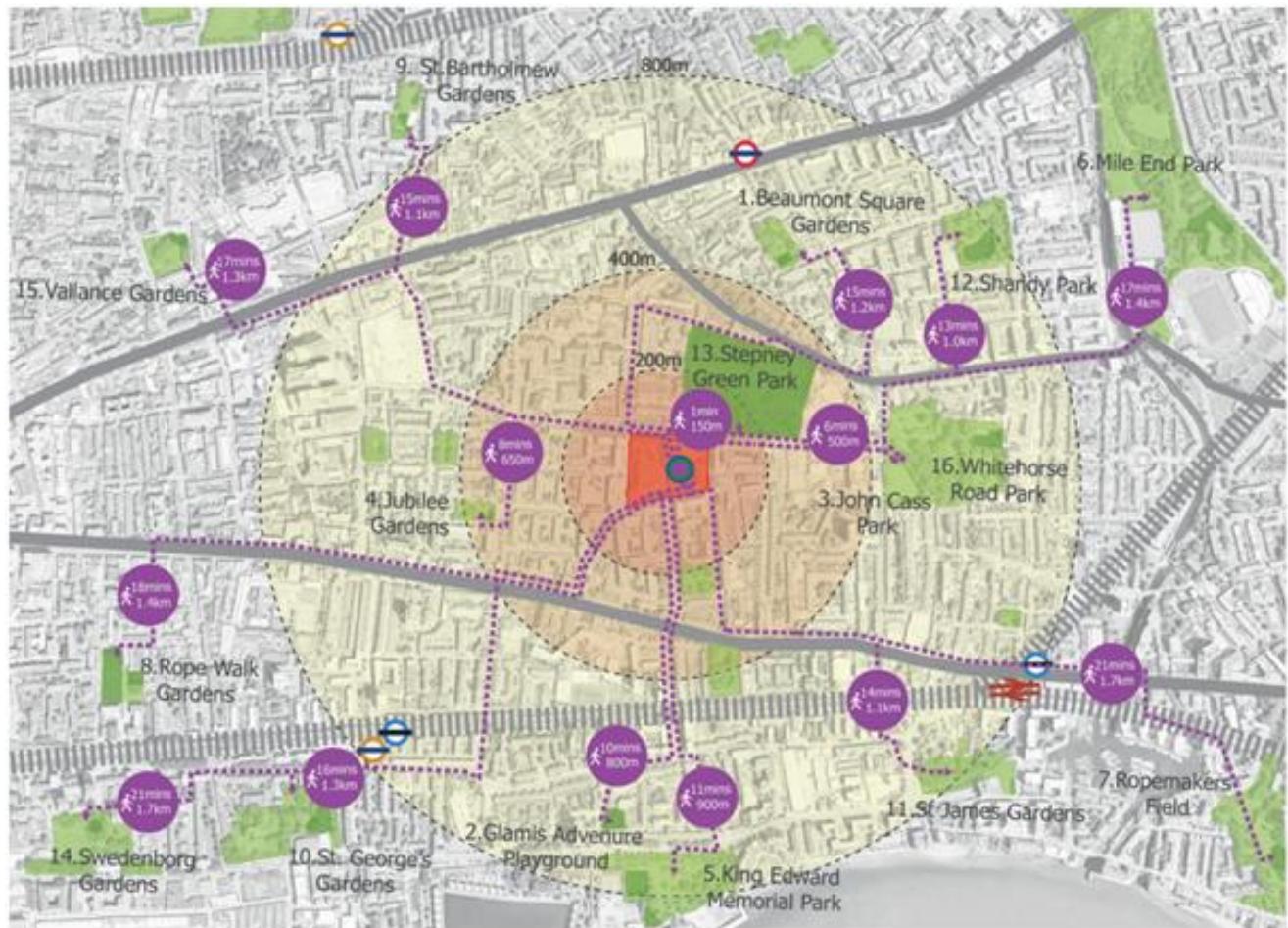
Proposed ground floor plans



Proposed third floor plan



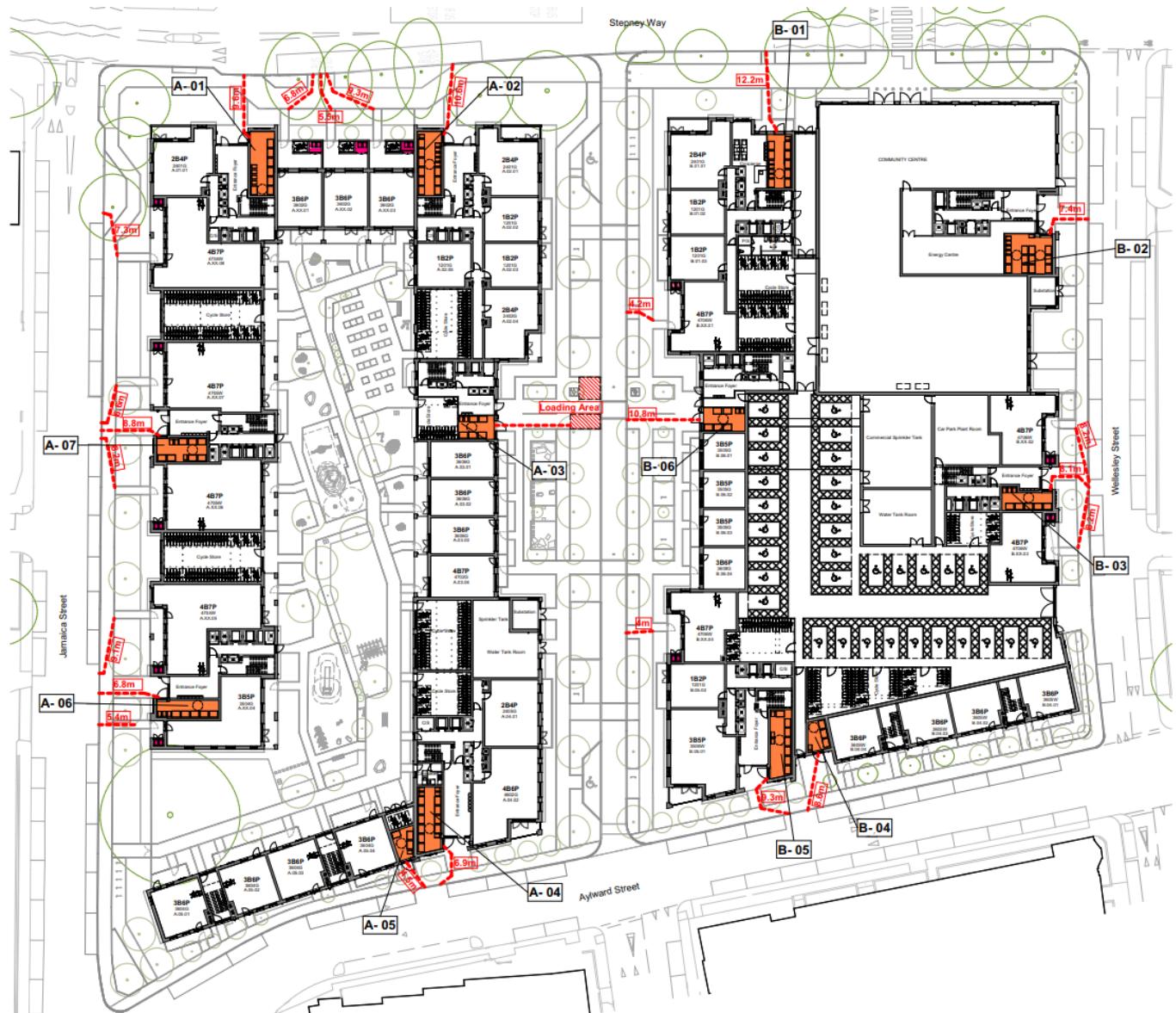
Phasing plan – Phase 1 (left), Phase 2 (right)



Surrounding Open Space Analysis



Child Play Space



Proposed Refuse Strategy



Proposed Cycle Storage

