

**Application for Planning Permission**[click here for case file](#)

<b>Reference</b>	PA/21/00900
<b>Site</b>	Innovation Centre, 225 Marsh Wall, London, E14 9FW
<b>Ward</b>	Blackwall and Cubitt Town
<b>Proposal</b>	Erection of a ground plus 55-storey residential building (Use Class C3), ground floor flexible commercial space (Use Class E), basement cycle storage, resident amenities, public realm improvements and other associated works.
<b>Summary Recommendation</b>	Refuse planning permission.
<b>Applicant</b>	Chalegrove Properties Ltd
<b>Architect/agent</b>	Savills (agent); Design Delivery Unit (architect)
<b>Case Officer</b>	Aleksandra Milentijevic
<b>Key dates</b>	<ul style="list-style-type: none"><li>- Application registered as valid on 03/05/2021</li><li>- Public consultation finished on 27/05/2021</li><li>- Amendments to the ground floor received on 03/03/2022</li><li>- Application presented to Strategic Development Committee on 30/03/2022</li><li>- Amendments to housing and cycle storage received on 07/04/2022</li><li>- Further details on waste received on 23/06/2022</li></ul>

**EXECUTIVE SUMMARY**

The proposed development is a mixed-use residential-led redevelopment of the site situated along the northern part of Marsh Wall in the Isle of Dogs. The proposal is for a 56 storey building (ground plus 55 storeys) measuring 185.3m AOD height.

The proposal is for a total of 390 residential units, of which 90 would be affordable units. The proposed development would provide 26.6% of affordable housing offer by habitable room. On the ground level, a total of 160 sqm of commercial floorspace (Use Class E) is proposed in the form of three units.

The site has an extant planning permission granted on appeal for 49 storeys (ground plus 48 storeys) (maximum AOD height 163.08m) comprising 332 residential units, which has been implemented and is currently under construction. The applicant seeks permission for a taller building on the same footprint to provide additional 58 residential units and increase in height of 7 storeys or 22m compared with the current permission.

In terms of the site layout, the proposed development includes a single tower on the eastern side of the site and publicly accessible landscaped area within the western part of the site,

which allows for the continuation of the public open space from the adjoining site to the west and the creation of a larger public open space.

Officers consider the height of the proposed building to be detrimental to the townscape and the Canary Wharf Skyline, which is of Strategic Importance. The proposal does not respond to the context and fails to deliver on the objectives and principles for managing tall buildings and their effect on local context and views as set out in the Local Plan.

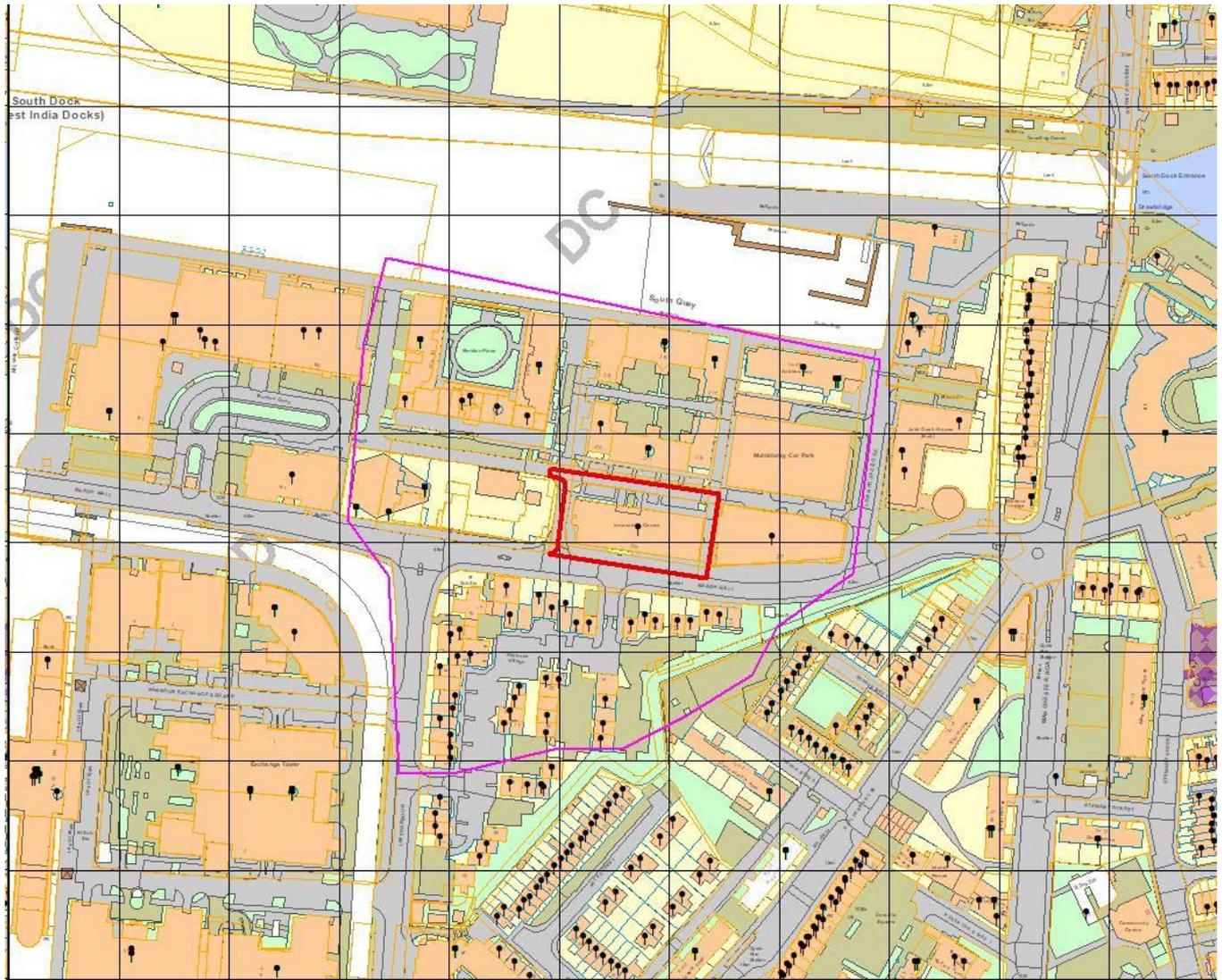
All of the units would be provided with adequate private, communal amenity and child play space. The daylighting and sunlighting conditions of the proposed units are considered to be acceptable. Similarly, the impact on the surrounding area in terms of daylight and sunlight, privacy, outlook and construction impacts are considered acceptable.

The highways aspects of the scheme, including servicing and deliveries which would occur on a private road to the north of the proposed building, are considered acceptable. The proposed cycle storage would include a policy compliant quantum and a mix of cycle stands within the basement.

The waste management and collection methods for the proposed development are not compliant with the Council's current adopted policies and Waste SPD. However, the impact from the additional units on the arrangements for waste management is not considered to be significant.

The planning balance exercise has not identified significant public benefits which would outweigh the harm caused to the townscape and Skyline of Strategic Importance, as well as the proposal's failure to meet other Development Plan policies relating to design tall buildings.

On this basis, Officers recommend the refusal of planning permission.



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- Planning Application Site Boundary
- Other Planning Applications
- Consultation Area
- Land Parcel Address Point
- Locally Listed Buildings
- Statutory Listed Buildings

## Planning Applications Site Map PA/21/00900

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



**London Borough  
of Tower Hamlets**

Scale : 50m grid squares

Date: 13 July 2022

## **1. SITE AND SURROUNDINGS**

- 1.1 The application site is of a regular rectangular shape measuring circa 0.3 hectares. The previous existing building on site, Angel House, was demolished to make way for a residential development of 49 storeys. Construction works are progressing on the construction of the extant planning permission.
- 1.2 The site is situated in the Isle of Dogs at the eastern end of Marsh Wall and is bounded by the private roads Meridian Place to the north, Lord Amory Way to the west and Lawn House Close and No.227 Marsh Wall (Sovereign House) to the east. To the south, the site fronts Marsh Wall. To the east of the site sits the Madison, a recently constructed residential tower. The Skylines Village business centre is situated to the south and south-west of the site, on the opposite side of Marsh Wall. There are lower scale residential developments to the north of the site, fronting South Dock.
- 1.3 The application site is not listed, nor does it fall within a conservation area. The site sits within the Isle of Dogs Archaeological Priority Area. The southern edge of the Coldharbour conservation area is situated further to the east of the site at the corner of East Ferry Road and Marsh Wall.
- 1.4 The site is included within the Canary Wharf Tall Building Zone and Canary Wharf Skyline of Strategic Importance, as well as a number of strategic views and river prospects identified in the Mayor's London View Management Framework.
- 1.5 The site sits within the Isle of Dogs Activity Area, Marsh Wall East Site Allocation, the Isle of Dogs and South Poplar Opportunity Area and the Neighbourhood Planning Area.
- 1.6 The site has good accessibility to public transport with a Public Transport Accessibility Level (PTAL) of 4 on a scale of 1 (poor) to 6 (excellent). South Quay DLR station is approximately 250m to the west. The area is served by bus routes D3, D6, D7 and D8 offering connections towards Crossharbour, Poplar, Bethnal Green, Stratford, Mile End Station. The site is situated within an area served by cycle routes linking to the wider network.
- 1.7 The site sits within Flood Zone 3a which indicates an area of high flood risk but is protected by the Thames Tidal Defences. The site is included within the Green Grid Buffer Zones and the London City Airport Safeguarding Zone.

## **2. PROPOSAL**

- 2.1 The application proposes a comprehensive redevelopment of the site for a high density residential development, with circa 160 sqm of commercial space on the ground floor fronting Marsh Wall comprised of three flexible units.
- 2.2 The proposed development includes a single tall building along the eastern portion of the site and associated landscaping towards the west. The proposed building would be 56 storeys tall (ground plus 55) with an AOD height of 185.3m.



Figure 1. Proposed ground floor plan.

- 2.3 The design of the building proposes a two-storey podium at ground and first floors, wrapped with the copper-coloured metal screens on the first floor with a more visually porous appearance on the ground floor. The proposed tower sitting on the podium would have a cruciform shape which would be clad in copper-coloured metal panels with vertical facet articulation. The building would be accentuated vertically with light-coloured vertical bands.

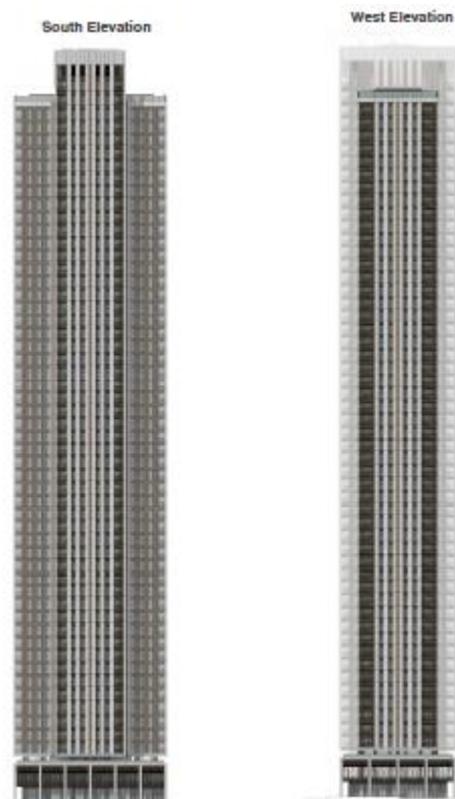


Figure 2. Proposed south and west elevations.

- 2.4 The proposal seeks to deliver 390 residential flats including 90 affordable homes which amounts to 26.6% affordable housing offer by habitable room at a 64% affordable rented housing (50 units) and 36% intermediate housing (40 units). The affordable rented units

would be split 50:50 between London Affordable Rent (LAR) and Tower Hamlets Living Rent (THLR).

- 2.5 The affordable housing units are proposed on Levels 3-15. The following table sets out the proposed tenure split within the building.

Floors 3-10	Affordable rented units
Floors 11-15	Intermediate units
Floors 16-54	Private units

*Table 1. Proposed tenure split.*

- 2.6 The residential entrances between market and affordable tenures are proposed to be separate. The entrance serving private units would front onto the proposed landscaped area to the west of the building whilst the affordable entrance is proposed within the south-eastern corner of the proposed building, fronting Marsh Wall. The remainder of the ground floor along the northern and eastern frontage would be used for servicing, including UKPN, cycle entrance lobby, refuse store, and management and parcel store.
- 2.7 The internal communal amenity space accessible to all residents is proposed on the first and second floors, and on Level 53 accessible to lift cores serving the private units. The proposed child play space would be provided externally within the proposed landscaped area, and internally on the first and second floors.
- 2.8 The building would have two basement levels. The first basement level would be used for cycle storage and refuse storage whilst the basement level below would include switch rooms, wet riser room, domestic water tank room and a sprinkler tank room. The proposal includes four blue badge car parking spaces, one located to the north along Meridian Place and three along the street to the east of the proposed building.
- 2.9 The proposed servicing and deliveries arrangement, including waste collection, would take place off Marsh Wall along the eastern and northern streets of the development.

### **3. RELEVANT PLANNING HISTORY**

- 3.1 The site has the following planning history:

PA/20/02455 – Certificate of Lawfulness for Existing Use granted on 11/01/2021.

Application for certificate of lawfulness in respect of existing works comprising the demolition of the existing build and structures constituting the lawful commencement of development of planning permission PA/16/02808.

PA/20/02314 – Application for Non-Material Amendment withdrawn by Applicant on 30/11/2020.

Amend condition 25 relating to energy and sustainability measures of planning permission PA/16/02808.

PA/20/01918 – Application for Non-Material Amendment granted on 29/09/2020.

Achieve a small design change to reduce the area and footprint of the approved basement of planning permission PA/16/02808.

PA/20/00948 – Application for Non-Material Amendment granted on 10/12/2020.

Amend the wording of Conditions 12, 13, 14(a), 15 and 18 of planning permission PA/16/02808.

PA/17/00846 – Temporary Planning Permission granted on 31/05/2017.

Temporary change of use of the basement of 225 Marsh Wall from ancillary parking (Class B1) floorspace, for use as Balfour Beatty's site office during the construction of Meridian Gate.

PA/16/02808 – Full Planning Permission refused on 10/11/2017. Appeal allowed on 10/10/2018. Permission implemented.

Demolition of all existing structures and the redevelopment of the site to provide a building of ground plus 48 storeys (maximum AOD height 163.08m) comprising 332 residential units (Use Class C3); 810 sqm of community floorspace (Use Class D1); 79 sqm of flexible retail/ restaurant/ community (Use Class A1/A3/D1); basement cycle parking; resident amenities; public realm improvements; and other associated works.

PA/15/02303 – Application for Full Planning Permission withdrawn by Applicant on 16/06/2016.

Demolition of all existing structures and the redevelopment of the site to provide a building of ground plus 55 storeys (186.35m AOD height) comprising 414 residential (Use Class C3); 1,418 sqm of flexible office/ community/ retail (Use Class B1/D1/A1/A3); resident amenities; basement car parking; public realm improvements, and other associated works.

PA/09/01637 – Application for Full Planning Permission refused on 16/12/2010.

Demolition of existing building and erection of a building of between 11 and 43 storeys in height, comprising of 265 residential units (Use Class C3); a 56-bedroom hotel (Use Class C1); office floorspace (Use Class B1); retail floorspace (Use Classes A1, A2, A3 and A4); and leisure uses (Use Class D2); together with a rooftop amenity area; plant and parking at basement level and associated landscaping.

- 3.2 The surrounding area is undergoing a significant redevelopment. The neighbouring sites have the following planning history:

***Skylines Village, Limeharbour***

PA/17/01597 – Resolution to grant Full Planning Permission obtained on 28/03/2019.

Demolition of all existing structures and construction of a new mixed use development consisting of five buildings ranging from ground plus 3 to ground plus 48 storeys in height comprising 579 residential units (Use Class C3); a two-form entry primary school with nursery facilities (Use Class D1); a 10,272 sqm GIA small and medium enterprise (SME) Business Centre (Use Class B1); 2,228 sqm GIA of flexible commercial floorspace (Use Class A1/A2/A3/B1/D1 and D2); single level basement car parking and servicing; and landscaped open space including a new public piazza with future pedestrian connection to Chipka Street, and ground and podium level communal amenity space.

***The Madison (Meridian Gate), Marsh Wall***

PA/14/01428 – Full Planning Permission granted on 06/03/2015. Construction completed in 2021.

Demolition of all existing structures and the redevelopment of the site to provide a building of ground floor plus 53 storeys comprising of 423 residential apartments (Use Class C3) and circa 415 sqm office (Use Class B1), 30 basement car parking spaces; the ground floor uses comprises an electricity sub-station, entrances for the office, affordable and private housing, basement access via car lift and cycle lifts, and circa 43 sqm retail/ café (Use Class A1/A3); public open space; and a single storey enclosure providing a secondary basement access.

***Dollar Bay***

PA/11/01945 – Full Planning Permission granted on 29/03/2021.

Redevelopment of the site for a residential led mixed use, comprising a 31 storey building (measuring 114.505m AOD), to provide 121 residential units (Use Class C3), 105 sq.m Use Class A1/A3 at ground floor, underground parking, plant and ancillary accommodation and hard and soft landscaping providing both public and private open space amenity.

#### **4. PUBLICITY AND ENGAGEMENT**

##### **Pre-application**

- 4.1 The applicant carried out the pre-application non-statutory consultation, which is detailed in the submitted Statement of Community Involvement (SCI), prepared by specialist community consultation group Your Shout.
- 4.2 The applicant sent a letter on 5<sup>th</sup> October 2020 to the properties in the surrounding area to invite the local community to online portal and events, as well as to seek feedback from those not able to attend online. On the same day, an online consultation portal, created and maintained by the applicant, went online. The portal included details on the proposed development and was regularly updated. Three online Q&A events were held on the online portal, one on 19<sup>th</sup> October 2020 and two on the following day.
- 4.3 Other mechanisms for communicating with the local community and stakeholders included a freephone number, a bespoke email address, a freepost address and a project website.
- 4.4 The submitted SCI details comments and questions received from the local community, which focused on the removal of trees on Marsh Wall, differences between the extant and new proposed development, transport matters such as access points and servicing, fire safety, design and height, and affordable housing.

##### **Statutory application consultation**

- 4.5 The application was consulted with the public by way of putting up a planning notice locally, a press notice in the local press. 247 neighbour letters were sent as indicated in the Planning Application Site Map above. The 30 day statutory consultation period for the application ended on 8<sup>th</sup> July 2021.
- 4.6 A total of 28 representations were received as a result of the Council's consultation process, out of which 2 were in objection and the remaining 26 in support of the development collated by the applicant in a single document. No address details have been provided for the individual support letter to ensure that this has been sent by a Tower Hamlets' resident or business.
- 4.7 The concerns and matters raised by representations are summarised below.
- 4.8 The objectors raised concerns regarding the following:
  - Proposed design of the tower no longer being in line with the adjacent Madison tower as the consented scheme was, and poor design when compared to other schemes in the area;
  - Existing issues relating to noise, daylight and sunlight, and parking as a result of the construction of the Madison tower, as well as the demolition from the application site.
- 4.9 The representations in support of the development made the following comments:
  - Positive words about the applicant and Poplar HARCA (who had expressed an interest in managing the affordable housing element)

- Need for more homes, including affordable homes;
- Additional homes to be welcomed by the Planning Committee;
- Mixing people in the same building as a great way to build a community; and
- Improvements to the approved application with respect to child play space and increased contributions to local services

## 5. CONSULTATION RESPONSES

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

### External responses

#### **Canal & River Trust**

5.2 The impact of overshadowing on biodiversity of the South Dock should be assessed. Development should contribute towards enhancement to the dock's ecology.

#### **City of London Corporation**

5.3 No comments received.

#### **Crossrail Safeguarding**

5.4 The application is outside the limits subject to consultation.

#### **Docklands Light Railway**

5.5 No objection in principle, subject to securing a condition for a base-line radio impact survey.

#### **Environment Agency**

5.6 The development is at a low risk of tidal and fluvial flooding. Other sources of flooding such as surface water should also be considered.

#### **Greater London Authority**

5.7 The Mayor of London, through the GLA case officer, prepared a Stage 1 report on the application which, while supportive of the proposed high density residential-led development in principle, made a series of recommendations as summarised below:

- The proposed level of affordable housing matches the extant scheme, and while there would be a very modest uplift in the overall number of affordable housing units, the level of affordable housing still falls significantly short of the threshold. Given the increased scale and quantum of development, there is a strong expectation that the site would deliver a substantially improved level of affordable housing.
- The design of the scheme is broadly supported and there would be no harm cause in heritage terms. Further information is required to address the functional and environmental impacts of the tall building, including construction methods and materials. Concerns regarding residential quality, including bedroom and private amenity space sizes for a couple of units, should be addressed.
- The quantum of long-stay cycle parking needs to be increased. Further information is required regarding local cycling and walking routes and the provision of additional on-street blue badge parking.

- Further information on various components of the energy strategy to ensure full compliance with the London Plan requirements, and to improve carbon reductions. Additional information is also required in relation to whole life-cycle carbon.

5.8 GLA case officers requested the following to be secured through s106 obligations: a Travel Plan; financial contributions towards improving bus capacity and the nearest cycle docking stations, management and maintenance of the public realm landscaping.

5.9 GLA case officers requested the following to be secured through conditions: a management plan; lighting strategy; child plays space details; details of materials, window reveals and ground frontages; landscape detailing and a long-term management and maintenance strategy; wheelchair units; air quality mitigation measures; and the provision of electric vehicle charging points, Construction Logistics Plan, Delivery and Servicing Plan should also be secured.

#### **Greater London Archaeology Advisory Service**

5.10 A single stage pre-commencement condition should be secured to safeguard the archaeological interest on the site.

#### **Historic England**

5.11 No comments to make.

#### **Health and Safety Executive (Planning Gateway One)**

5.12 HSE is satisfied with the information provided with the application. The submitted fire strategy responds to the London Plan policy requirements. The subsequently submitted fire statement form confirms that the proposal is being taken forward as a fully fire engineered design. The applicant will have to demonstrate that the proposals afford an appropriate level of safety at later regulatory stages.

#### **Isle of Dogs Neighbourhood Planning Forum**

5.13 No comments received.

#### **London Borough of Greenwich**

5.14 No comments received.

#### **London Borough of Hackney**

5.15 No comments received.

#### **London Borough of Lewisham**

5.16 No comments received.

#### **London Borough of Newham**

5.17 No comments received.

#### **London Borough of Southwark**

5.18 No comments received.

#### **London Bus Services**

5.19 No comments received.

#### **London City Airport**

5.20 The inclusion of a bespoke condition to provide details on construction methodology should be secured.

**London Underground**

5.21 No comments received.

**Marine Management Organisation**

5.22 Any works within the Marine area require a licence from the Marine Management Organisation.

**Maritime Greenwich World Heritage Co-Ordinator**

5.23 No comments received.

**Metropolitan Police – Crime Prevention Design Advisor**

5.24 A Secured by Design condition (SBD) should be secured to provide details on how the development complies with SBD standards.

**National Air Traffic Services**

5.25 No safeguarding objection to the proposal.

**National Amenities Society**

5.26 No comments received.

**National Grid (Plant Protection)**

5.27 Note the presence of an Above Ground Installation (AGI) in proximity to the site.

**Natural England**

5.28 No comments to make.

**Network Rail**

5.29 No objections to the proposals.

**Port of London Authority**

5.30 No objection in principle. Further consideration should be given to the use of the river for residents' travel and the transportation of construction materials to and waste materials from the site.

**Thames Water Authority**

5.31 A condition should be included to secure details on a Piling Method Statement. An informative should be attached to provide details on water pressure and the provision of protection to the property to prevent sewage flooding.

**The Gardens Trust**

5.32 No comments received.

**The Greenwich Society**

5.33 No comments received.

**Transport for London**

- 5.34 Details have been provided within the Mayor's Stage 1 Report (as detailed above under the GLA's consultee response).

### **Internal responses**

#### **LBTH Biodiversity Officer**

- 5.35 The application site consists largely of existing buildings, and the loss of several non-native trees will have a small adverse impact on biodiversity. The proposed soft landscaping and level 52 amenity space should contribute to a Local Biodiversity Action Plan. Biodiversity enhancements should be secured via condition.

#### **LBTH Building Control**

- 5.36 No comments received.

#### **LBTH CIL Team**

- 5.37 The proposed development would be liable for Community Infrastructure Levy (CIL). The actual amount of CIL can only be confirmed once all relevant details have been approved and any relief claimed.

#### **LBTH Education Development Team**

- 5.38 No comments received.

#### **LBTH EIA Officer**

- 5.39 The Environmental Statement is considered to be adequate for the submitted development.

#### **LBTH Energy Efficiency and Sustainability Officer**

- 5.40 The proposals are for a 231.7 tonnes/CO<sub>2</sub> reduction in on-site CO<sub>2</sub> emissions. This results in a carbon offsetting contribution of £438,330 to offset the remaining 153.8 tonnes CO<sub>2</sub> and achieve net zero carbon. This figure is based on the £95 per tonne rate as identified in the London Plan.

- 5.41 The on-site savings from renewable energy generating technologies should be maximised – a detailed roof layout should be provided demonstrating the roof's potential for a PV installation. A detailed feasibility for a connection to the Barkantine Heat Network should be secured prior to above ground works on site.

#### **LBTH Environmental Health**

##### **Air quality**

- 5.42 No objections, subject to the following conditions to be secured: construction/ demolition site dust control, air quality standards for boilers, kitchen extract standards for commercial uses, construction plant and machinery (NRMM), and PM<sub>10</sub> monitoring condition.

##### **Contaminated land**

- 5.43 The desk study, site investigation and remediation strategy reports have been approved as part of the previous permission and are considered sufficient information.

##### **Noise and vibration**

- 5.44 Conditions regarding restrictions on demolition and construction activities, noise mitigation measures and plant details should be secured.

### **LBTH Growth & Economic Development**

5.45 No comments received.

### **LBTH Health Impact Assessment Officer**

5.46 The HIA should explain how and why the scheme is addressing the shortfall of the affordable housing. Further details are required on the discrepancy on number of residents in HIA and other documents, access to open spaces, active travel and any safety issues.

### **LBTH Health & Safety Officer**

5.47 The development should comply with the Construction (Design and Management) Regulations 2015.

### **LBTH Housing Delivery Team**

5.48 The proposal provides 47% of family affordable rented units which is slightly above the policy requirement of 45% family affordable rented homes. There are no family sized units within the intermediate tenure and no justification was provided by the applicant. The revised offer does not include an increase in affordable rented units, only differences in private and intermediate tenures. The management and cost of using the child play space should be confirmed. Family units should have a separate kitchen where possible.

### **LBTH Infrastructure Planning Team**

5.49 No comments received.

### **LBTH Occupational Therapist**

5.50 No comments received.

### **LBTH Place Shaping**

5.51 There are strong urban design objections to the proposed increase in height from the consented extant scheme. The height of the proposed building is not contextual and fails to meet the aspirations for the Canary Wharf Tall Building Zone. There would be harm cause to the townscape. The proposed is not supported in terms of its impact on the composition of the two clusters and Skyline of Strategic Significance.

5.52 Further improvements should be made to the ground floor of the proposal to maximise active frontages. The proposed communal amenity spaces on the ground floor are not considered to be active spaces. The proposed eastern and northern ground floor spaces are given to servicing areas which would create service street rather than active ones.

5.53 The use of materials should respond to those of the neighbouring site. No objections to this elements, however further details should be provided. Details on landscaping should also be provided.

### **LBTH Senior Arboricultural Officer**

5.54 No comments received.

### **LBTH Street Naming and Numbering Officer**

5.55 No comments received.

### **LBTH Surface Water Run Off**

5.56 No comments received.

## **LBTH Transportation & Highways**

- 5.57 The removal of existing parking is welcomed. There are concerns about the opening of another road junction onto Marsh Wall to the eastern end of the site which could introduce more potential conflict points.
- 5.58 The principle of car free development is supported. The proposed four parking bays only relates to 1% of units against the minimum of 3% provision where the remaining 7% (total of 10% overall) would be provided when the demand arises. The number and location of provided accessible bays does not promote inclusive design.
- 5.59 The proposed type of cycle storage stands is not the sort of stands supported in residential developments, and not at the proposed quantity. The proposed semi-vertical cycle stands do not allow accessibility for all users or cycles. These spaces are not inclusive to all and would prevent anyone with mobility or strength issue from using them.
- 5.60 The proposed servicing arrangement would be from Meridian Place, which is a private road and as such, there are no objections. Improvements indicated in the Active Travel Zone assessment should be secured.
- 5.61 Should planning permission be granted, conditions regarding a final Service Management Plan, Travel Plan, Construction Management Plan, as well as a parking management plan and a s278 agreement.

## **LBTH Viability Officer**

- 5.62 The current offer of 25.9% affordable housing (by habitable room) represents the maximum that can viably be supported by the scheme; primarily due to the high land value which is found when the AUV approach is used.
- 5.63 Overall, the parties agree, however, it should be noted that the only outstanding matters is the target profit which does not impact overall conclusion at this stage. The profit at 17.50% is not unusual and it should be secured in the s106 agreement.

## **LBTH Waste Officer**

- 5.64 For this scale of building, Eurobins are not considered appropriate. The Reduce Recycle Waste SPD includes a decision tree which would suggest different methods for developments larger than 50 units and taller than 3 stories.
- 5.65 The Council does not support twice a week waste collection which has been suggested.
- 5.66 Additional information has been provided on the waste management during collection time, internal storage arrangements within proposed units, communication with occupants and management of bulky waste.

## **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
  - Isle of Dogs Neighbourhood Plan 2019-2031 (Adopted Version, 19 May 2021)
- 6.3 The key development plan policies relevant to the proposal are:

Land Use (*residential*)

- London Plan policies: H1
- Local Plan policies: S.H1

Housing (*affordable housing, housing mix, housing quality, amenity*)

- London Plan policies: D6, D7, D11, D12, H4, H5, H6, H8, H10
- Local Plan policies: S.H1, D.H2, D.H3
- Isle of Dogs Neighbourhood Plan policies: D2

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
- Isle of Dogs Neighbourhood Plan policies: 3D1

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

- London Plan policies: D3, D6, D9
- Local Plan policies: D.DH8
- Isle of Dogs Neighbourhood Plan policies: CC1, CC2

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
- Isle of Dogs Neighbourhood Plan policies: CC3, D1, SD1

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

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (updated 2019)
- LP Housing SPG (updated 2017)
- LP Affordable Housing and Viability SPG (2017)
- London View Management Framework SPG (2012)
- GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- LBTH Planning Obligations SPD (2021)
- LBTH Development Viability SPD (2017)
- LBTH Community Infrastructure Levy (CIL) Charging Schedule (2020)
- LBTH High Density Living SPD (2021)
- Building Research Establishment's Site Layout for Daylight and Sunlight: A Guide to Good Practice (2011)
- Isle of Dogs and South Poplar Opportunity Area Planning Framework (September 2019)

## 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. Planning Balance
- viii. Infrastructure
- ix. Local Finance Considerations
- x. 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 application site is included within the Marsh Wall East Site Allocation, the Isle of Dogs and South Poplar Opportunity Area and the Canary Wharf Tall Building Zone, all of which are designations earmarking the site for significant housing delivery.

7.4 In addition, the principle of residential use on the site has been established by the extant consent, which has been implemented.

### Commercial use

7.5 The site is situated within the Isle of Dogs Activity Area. Policy S.TC1 of the Local Plan identifies Activity Areas as areas of transition between the scale, activity and character of its surrounding area, to support a mix of uses which make a positive contribution to health and well-being and promote active uses at ground floor level.

7.6 The proposed development includes a total of 160 sqm of commercial space (Use Class E) along the majority of the ground floor fronting Marsh Wall, save for the south-eastern corner which is the affordable entrance.

7.7 In terms of land use, the proposed commercial use is considered acceptable and in accordance with the planning policy.

## **Housing**

7.8 London Plan Policy H1 places a strategic expectation that the Borough will need to deliver 35,110 as a 10-year housing target (annualised to 3,511 per year) between 2019/20 and 2028/29. Tower Hamlets Local Plan Policy S.H1 outlines the need for the Borough to secure the delivery of 58,965 new homes across the Borough between 2016 and 2031, which equates to 3,931 new homes each year.

7.9 Neighbourhood Plan policy D2 requires high density developments to demonstrate how they meet specific requirements of the GLA's Housing SPG. This has been addressed within the housing sections below.

7.10 In principle, the proposed development would contribute to the achievement of the Council's housing targets and will meet the requirements of the Marsh Wall East site allocation in which it is situated.

## Housing Mix and Tenure

- 7.11 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).
- 7.12 The applicant has made slight amendments to the proposed housing mix in October 2021 which mainly resulted in the minor changes to the intermediate and private units. Further amendments have been made in April 2022. The table below details the latest proposed housing mix of the scheme.

Tenure	1-bed	2-bed	3-bed	4-bed	Total
Market	159	126	15	0	300
Affordable	13	14	9	14	50
Intermediate	20	20	0	0	40
<b>Total</b>	<b>192</b>	<b>160</b>	<b>24</b>	<b>14</b>	<b>390</b>

*Table 2. Proposed housing mix.*

- 7.13 The table below sets out the scheme's housing mix against the policy requirements set out in D.H2.

Unit type	Market		Intermediate		Affordable rented	
	Policy Target	Scheme	Policy Target	Scheme	Policy Target	Scheme
1 bed	30%	53%	15%	50%	25%	26%
2 bed	50%	42%	40%	50%	30%	28%
3 bed	20%	5%	45%	0%	30%	18%
4 bed					15%	28%

*Table 3. Proposed housing mix assessed against policy requirements.*

- 7.14 As seen in the above table, the proposed affordable rented housing mix would provide a portion of family sized units of 46% with the provision of a larger portion of 4 bedroom units when assessed against the policy requirements. The intermediate and market tenures would significantly deviate from the policy target.
- 7.15 In particular, the proposal includes no family sized units in the intermediate sector against the policy requirement of 45%. Whilst the policy allows for flexibility in the market sector, no justification has been provided regarding the significant failure to meet the policy requirement for the intermediate unit mix.
- 7.16 Given the under provision of a minimum of 35% of affordable housing in total, as well as the lack of a policy compliant housing mix, the proposed was viability tested in order to secure a maximum viable affordable housing offer, as detailed in the section below.

## Affordable Housing

- 7.17 London Plan policy H5 sets out a threshold approach to residential applications which require a minimum of 35% of affordable housing. The policy further sets out that, in order to comply with the fast-track route (no viability assessment required), developments must meet

the minimum affordable housing, the relevant tenure split and other policy requirements to the satisfaction of the borough.

- 7.18 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.
- 7.19 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. Paragraph 9.30 of the policy requires affordable rented housing to be offered as 50% London Affordable Rent (LAR) and 50% as Tower Hamlets Living Rent (THLR).
- 7.20 Part 2 (d) of policy D.H2 particularly relates to incremental development, which provides further housing units through an application to extend an existing development on the same site. For these types of developments, the affordable housing calculation for the new units will be based on the combined number of units as the new units will be part of the existing development and the affordable housing requirements will be calculated accordingly, taking into account the affordable housing already delivered or secured.
- 7.21 Tower Hamlets Local Plan policy D.H3 requires development to provide affordable housing which is not externally distinguishable in quality from private housing.
- 7.22 The proposed development would provide a total of 26.6% affordable housing. The proposed tenure split includes 64% of affordable rented units and 36% of intermediate units against a 70:30 policy requirement in favour of affordable rented. The proposed affordable rented units would be equally split between LAR and THLR.
- 7.23 The application was supported by the submitted Financial Viability Assessment (FVA), prepared by Avison Young, which was reviewed and scrutinised by the Council's viability officers.
- 7.24 Following a robust review of the submitted viability evidence, LBTH viability team concluded that the proposed offer represents the maximum that can viably be supported by the scheme.
- 7.25 As a comparison exercise, the original permission included an affordable housing offer of 25%, which indicates that the proposed development increases the offer for 1.6% which amounts to 19 additional affordable housing units. A net increase represents 10 affordable rented and 9 intermediate units.
- 7.26 When considering the 58 additional homes proposed in this development, compared with the extant permission, in isolation, the proposed additional affordable housing contribution would equate to 35.4% by habitable room. However, it should be noted that the Local Plan policy does not consider the incremental development to be separated from the already consented development and as such, the affordable housing calculation should be considered as a whole, which for the proposed development is 26.6%.

#### Wheelchair Accessible Housing

- 7.27 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'.
- 7.28 A total of 12.5% of all units is proposed as wheelchair accessible dwellings meeting part M4 (3) of the Building Regulations. The number of wheelchair units varies across different tenures, which is set out in the following table.

Tenure	Number of proposed wheelchair accessible units	Percentage of the tenure
Affordable rented	8	16%
Intermediate	4	11%
Private	38	12%
Total	50	12.5%

*Table 4. Proposed wheelchair units tenure split.*

- 7.29 All of the proposed wheelchair accessible units within all tenures would be 1 bedroom and 2 bedroom units, as shown in the Design and Access Statement. None of the proposed wheelchair units are family sized, which is of particular importance within the affordable rented sector, for which there is generally a higher priority need in the borough.
- 7.30 Overall, the proposed wheelchair housing exceeds the minimum requirements by providing an overall 12.5%, differently split amongst the tenures with the highest provision within the affordable rented tenure.

#### Quality of Residential Accommodation

- 7.31 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This policy also requires the maximisation of dual aspect dwellings, the provision of sufficient daylight and sunlight to new dwellings and a minimum floor-to-ceiling height to be 2.5m for at least 75% of gross internal area (GIA) of each dwelling.
- 7.32 Tower Hamlets Local Plan Policy D.H3 requires developments to meet the most up-to-date London Plan space standards.
- 7.33 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.
- 7.34 In addition, London Plan Housing SPG reiterates the above standards and states that a maximum of eight dwellings per each core on each floor.
- 7.35 Within the proposed development, a maximum of eight dwellings per core on each floor within the residential tower is provided.
- 7.36 Due to the proposed building's cruciform layout, all of the residential dwellings would be dual aspect. All dwellings would meet the minimum internal space standards, including built-in storage.
- 7.37 Most of the dwellings would have private amenity spaces in the form a corner balcony which has a minimum depth of 1.5m. For larger units, such as 4 bedroom affordable rented units, an additional balcony would be provided. The proposed two 3-bedroom private units on Level 53 would also have two terraces adjoining the communal amenity space for private units.
- 7.38 In terms of the floor-to-ceiling heights, bathrooms within the proposed units would measure 2.3m whilst the remaining parts of proposed dwellings would have a minimum required 2.5m of floor-to-ceiling height. Floor areas within units with less than 2.5m of floor-to-ceiling height would not exceed more than 10% which is considered policy compliant.

### *Daylight & Sunlight*

- 7.39 Policy D.DH8 requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments. Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011). The primary method of assessment of new build accommodation is through calculating the average daylight factor (ADF). BRE guidance specifies the target levels of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.
- 7.40 Further guidance is provided with regard to sunlight, with the BRE guidance stating that in general, a dwelling which has a particular requirement for sunlight will appear reasonably sunlit if at least one main window faces within 90 degrees due south and the centre of one window to a main living room can receive 25% annual probably sunlight hours (APSH), including at least 5% annual probably sunlight hours in the winter months (WPSH) between 21 Sept and 21 March.
- 7.41 An Internal Daylight, Sunlight and Shadow Report, prepared by Point 2, which assesses the amenity of the proposed development, has been included within Chapter 10 of the Environmental Statement (Volume 3, Annex 6). The Council's external consultants, Delva Patman Redler (DPR), have reviewed the submitted information.

### *Daylight*

- 7.42 The applicant has analysed all habitable rooms for ADF, in line with the BRE guidance. This includes a total of 1020 habitable residential rooms. 1018 of these rooms would meet the minimum recommended ADF targets which equates to 99% of compliance for daylight. The 2 rooms that do not satisfy the minimum ADF targets would fall short by only 0.1%.
- 7.43 Overall, the proposed development would provide a very good level of adherence to daylight guidelines.

### *Sunlight*

- 7.44 A total of 699 rooms have been tested for sunlight due to their southerly aspect. 472 of these would satisfy the guidelines for both annual and winter sunlight. This amounts to a 68% compliance with sunlight guidelines.
- 7.45 Out of 227 habitable rooms which would not meet the sunlight guidelines, 89 would be shared living/ kitchen/ dining (LKD) areas whilst 138 would be bedrooms. Out of 89 LKD areas, only 22 would meet the WSHP. The remaining 67 LKD areas, which would not meet neither ASHP nor WSHP, would be predominantly east or west facing which would limit the amount of sunlight received.
- 7.46 Overall, 29.5% of habitable rooms would not meet any sunlight guidelines. However, it should be noted that these would still be appropriately lit rooms due to their layouts and window arrangements.

### *Wind/Microclimate*

- 7.47 Chapter 11 (Wind Microclimate) of the Environmental Statement provides an analysis of the wind conditions within the proposed development, including suitability of various spaces with respect to their intended uses.
- 7.48 The proposed development would include embedded mitigation measures, including various forms of landscaping, a canopy over the terraces on Level 2 and balustrades on balconies. These details of these would have been secured via condition.

### *Noise and Air quality*

- 7.49 Chapter 8 (Air quality) and Chapter 9 (Noise and Vibration) of the submitted Environmental Statement include the relevant details relating to air quality and noise conditions which would be experienced by future residents.
- 7.50 The Council's air quality and noise officers reviewed the information and raised no objections in terms of quality of accommodation relating to noise and air quality. Standard conditions regarding the compliance with the relevant air quality standards and the provision of additional detailed information with respect to noise and sound insulation would have been secured via condition.

#### Fire safety

- 7.51 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.
- 7.52 The application is supported by a Fire Safety Statement, produced by a Chartered Fire Engineer of Salisburyfire, who are considered to be a third party and suitably qualified assessor.
- 7.53 The updated Fire Safety Statement has been submitted throughout the course of the application to include details on methods of construction, as requested by the GLA. The applicant has also submitted a fire statement form and additional information, as requested by the HSE Planning Gateway One.
- 7.54 The proposal would be a fully fire engineered design. The proposed fire strategy states that the building is designed to incorporate appropriate features to reduce the risk to life in the event of a fire and minimise the risk of fire spread. A dedicated evacuation lift is proposed, together with a Fire Fighting lift.
- 7.55 The submitted information has been reviewed by the Health and Safety Executive (Planning Gateway One), who have confirmed that they are satisfied with the fire safety information provided with the application.

#### Communal Amenity Space

- 7.56 Tower Hamlets 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 Council's child yield calculator.
- 7.57 The proposed development would require a minimum of provision of 430 sqm of communal amenity space. The proposed development overprovides the required communal amenity space by providing a total of 734 sqm of communal amenity space.
- 7.58 The proposed communal amenity space provided on the second floor would amount to 430 sqm (270 sqm provided externally and 160 sqm internally), and would be accessible to all residents of the building given that it would be served by all lifts. It would also be located adjacent to the child play space on the same level allowing overlooking between the spaces.
- 7.59 On Level 53, the proposed communal amenity would provide a total of 304 sqm external spaces which would be accessible to private units as it would be served by two of the private lifts (PL1 and PL3). Whilst there is a policy compliant level of shared amenity space, Officers remain concerned that this could promote social exclusion, and although not a reason for refusal, this element of the scheme is not supported as it runs contrary to Policy S.SG2 and D.DH6 which seeks to increase opportunities for social interaction and social cohesion.

#### Child play space

7.60 The GLA's Play and Recreation Supplementary Planning Guidance (2012) provides detailed guidance on the appropriate distances to local play spaces as well as guidance on the needs of the different age groups in terms of equipment and scale. The SPD also provides details on the needs of different age groups.

7.61 The following table provides details on child yield generated by the proposed development and the minimum child play space requirements based on the LBTH Child Yield and Play Space calculator.

Age	Child yield	Required play space [sqm]
0-4	46	460
5-11	38	377
12-18	37	367
Total	121	1,206

*Table 5. Child yield and child play space requirements for the proposed development.*

7.62 In total, the proposed development would provide a policy compliant child play space offer of 1,206 sqm, out of which 770 sqm would be on the first floor, 273 sqm on the second floor whilst 163 sqm is proposed within the landscaped area of the development. The age breakdown and location of the proposed child play space is shown in the table below.

Age	Required play space [sqm]	Proposed play space [sqm]	Location
0-4 years	462	462	1 <sup>st</sup> and 2 <sup>nd</sup> floors, and within the landscaped area
5-11 years	377	377	1 <sup>st</sup> and 2 <sup>nd</sup> floors
12-18 years	367	367	1 <sup>st</sup> floor
Total	1,206	1,206	

*Table 6. Age breakdown of the proposed child play space.*

7.63 Limited information has been provided regarding the detailed design of the proposed child play spaces. However, the proposed playspace strategy within the Design and Access Statement sets out high level aims for the proposed spaces, and further details would have been secured via condition.

### **Design & Heritage**

7.64 The importance of good design is emphasised in Chapter 12 of the NPPF and the National Design Guide and development Plan policies which 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. Therefore, within the borough, it is expected that development must do more than simply preserve, the requirement is to enhance and improve.

7.65 London Plan (2021) policy D3 promotes the design-led to optimise site capacity. The policy requires high density development to be located in sustainable location, in accordance with London Plan (2021) D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.

7.66 Furthermore, policy D3 requires developments to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, as well as to respond to the existing character of a place by identifying the special and valued features and

characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

- 7.67 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.
- 7.68 Neighbourhood Plan policy 3D1 requires all strategic developments to be accompanied by a 3D model that is compatible with the model used for assessment as part of the development management process. The applicant has submitted a Vu City model which indicates compliance with the Neighbourhood Pan policy.

### Site Layout

- 7.69 Tower Hamlets Local Plan policy S.DH1 requires development to represent good urban design including coherency in building lines, roof lines and setback, complementing streetscape rhythms and associated landscapes.
- 7.70 The proposed layout of the site includes a single building situated within the eastern part of the site whilst the remaining part of the site along its western section is proposed as a publicly accessible landscaped area which includes child play space along its northern part and seating areas to the south.
- 7.71 The adjoining site to the west, known as the Madison, is a recently completed high-density development which includes a tall building within its western portion of the site with publicly accessible space along the remaining part of the site to the east. As seen in the image below, the application site contributes towards the delivery of publicly accessible open space in the area by complementing the adjoining site.



*Figure 3. Plan showing The Madison on the left and the proposed development on the right., with a public open space in between.*

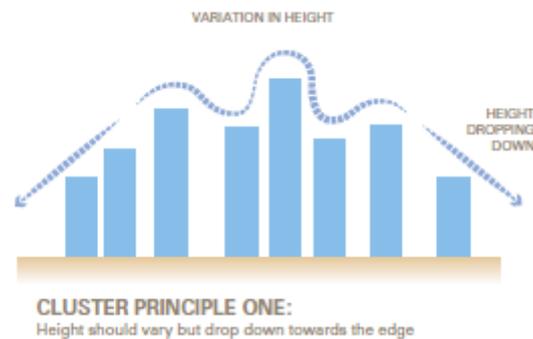
- 7.72 The continuation of the public open space in order to create a larger open space with the adjoining development is supported. It should be noted that the ideal site layout would provide some additional “breathing space” between the application site and 227 Marsh Wall to the east. However, this would compromise the delivery of a continued open space. As such, the general site layout arrangement is considered acceptable.

### Townscape, Height and Massing

- 7.73 London Plan (2021) policy D9 provides a strategic guidance for tall buildings in the London area. The policy also sets out criteria which against which development proposals should be assessed and these include visual, functional and environmental impacts. With regards to visual impacts, the policy states that tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views. Tall buildings should also reinforce the spatial hierarchy of the local and wider context and aim legibility and wayfinding.

- 7.74 Tower Hamlets Local Plan policy D.DH6 seeks to guide and manage the location, scale and development of tall buildings in the borough. The policy identifies five tall buildings clusters in the borough and sets out principles of each of them.
- 7.75 Policy D.DH6 sets out a number of principles for tall buildings, including that development must demonstrate, amongst other, how they will:
- Be of a height and scale, mass and value that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;
  - Enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes (including building/ roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings;
  - Provide a positive contribution to the skyline during both the day and night time; and
  - Present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.
- 7.76 Part 2 of Local Plan policy D.DH6 requires developments to have regard to the Tall Buildings Study, which forms the evidence of the Local Plan and should be read alongside the policy. The study provides detailed guidance on the potential location, design and height of tall buildings in the borough.
- 7.77 In particular, section 7 of the Tall Buildings Study sets out a tall building strategy which is intended to be a guide for tall building proposals. The strategy sets out 12 principles that each tall building should fall, including promoting outstanding design, enhancing image and strengthening sense of place, protecting and enhancing the existing heritage and townscape, to be proportionate to the role and importance of a place, and to safeguard Canary Wharf's iconic image.
- 7.78 The Isle of Dogs and South Poplar Opportunity Area Planning Framework provides an overview of the existing character within the OAPF area. With regards to the Canary Wharf character area, it is stated that tall office and residential buildings noticeable step down in height from One Canary Square and variation in building heights allows views through the tall building cluster.
- 7.79 The OAPF also stated that building heights strategy should respond to the existing context in terms of visual impact and design to create good microclimate in line with LBTH policy on tall buildings (D.DH6).
- 7.80 The Council is currently preparing the Tall Buildings Supplementary Planning Document to support the delivery of the Local Plan and the London Plan with respect to tall buildings. The formal consultation closed on 4<sup>th</sup> March 2022. The weight given to the emerging SPD should be appropriate to its stage of preparation, which at present is considered to be limited. However, it should be noted that the SPD provides a useful assessment of the existing area, in addition to setting out detailed guidance for developments.
- 7.81 The site's inclusion within a tall building zone confirms the appropriateness of a principle for delivering a tall building on the site. In addition, the extant consent for the application site includes a 49 storey residential tower. As such, the principle of a tall building on the application site has been established. However, any building coming forward on the site should be subject to the requirements set out in the Local Plan policy.
- 7.82 The site is situated within the most southern edge Canary Wharf Tall Building Zone (TBZ). Within this zone, buildings are expected to step down from the central location at One

Canada Square. Importantly, the stepping down towards the edges of the zone allows for the creation of varying height across the cluster to meet the policy objective. The stepping down towards the edges is also a general objective for all TBZs as stated in paragraph 8.73 of the supporting text of policy D.DH6, as shown graphically below.



*Figure 4. Tower Hamlets Local Plan 2031 policy D.DH6 step down requirements.*

- 7.83 Implementing these principles within the Canary Wharf TBZ, the height of tall buildings should respond to the location with potential for greater height towards the west of the eastern section of Marsh Wall and lower heights to the east. This is crucial from a policy point of view to achieve a sense of layering in height of buildings with the creation of varying heights when the Canary Wharf is viewed from distance, and to respond to the lower scale context to the south and east of the area.
- 7.84 The relationship between the Canary Wharf TBZ and the Millwall Inner Dock TBZ situated to the south with its northern edge on the opposite side of Marsh Wall, is important given that the policy seeks to maintain the primacy of the Canary Wharf TBZ as a Skyline of Strategic Importance and to ensure that the Millwall Inner Dock TBZ remains subservient. The step down from north to south as well as from the central point to east and west would ensure this policy objective.
- 7.85 In addition to this, heights in the cluster should vary in order to create a lively skyline and an aesthetically pleasing form to the cluster, mediating its high point and lower context and creating appropriate contextual responses to the surrounding environment.
- 7.86 The consented 49 storey tower at the application site sits at 163m AOD whilst the proposed tower would be 56 storeys tall with a height of 185m AOD. The neighbouring Madison, located further to the west along Marsh Wall is 187m AOD while Dollar Bay, sitting at the eastern most edge of the Canary Wharf TBZ is 115m AOD in height.
- 7.87 The tallest element of the Skylines Village situated to the south of the application site would be 167m AOD, further dropping to 90m, 50m and 18m. It should also be noted that Skylines sits within the Millwall Inner Dock TBZ and while it is taller than the consented height of 225 Marsh Wall, the tallest building sits closer to the Madison and as such, is further to the west than the application site. This secures a step down approach between the two clusters, as well as ensuring the variety in heights when viewed in conjunction with the application site.
- 7.88 The mentioned developments in the proximity to the site are shown visually in the image below. It should be noted that the relationship between Dollar Bay and the Madison, as well as the space between these two sites in which the application site is situated, forms an important part of the assessment for the proposed development. It is the crucial part of the TBZ which would ensure that the step down approach is secured as stipulated in the policy.



*Figure 5. View of the surrounding area. Dollar Bay sits further to the east (further right in the image).*

- 7.89 As a comparison, the consented height at the application site would be approximately 24m shorter than the neighbouring Madison and approximately 50m taller than Dollar Bay. The proposed tower would result in the new building being only 2m shorter than the neighbouring Madison, which would be a marginal difference and barely discernible in local townscape views. The proposed height would be 70m taller than Dollar Bay.
- 7.90 The proposed height and scale would not respect the existing character of the area and would result in the loss of a step down approach towards the edge of the Canary Wharf TBZ through the loss of varying heights in this part of cluster, which have been secured with the extant consent and surrounding consented developments as set out above. The proposal would contribution towards the creation of a "table top" effect which fails to meet the policy objectives for a step down approach.
- 7.91 The effect of the proposed height would in fact be exacerbated visually, in views form the north and south, including the LVMF view from the General Woolfe Statue, due to the design of the Maddison Building, which incorporates a sloping element in the roof form, such that the maximum height of the east elevation is less than that of the west elevation.
- 7.92 As a result, the proposed building would undermine the principles and objectives of the TBZ policy in the Local Plan, and adversely affect the townscape of the Canary Wharf area. As such, the proposal would fail to positively contribute to the skyline.
- 7.93 The above assessment is based on a detailed consideration of the buildings in context, as well as the tall buildings principles set out for the area in various policy documents. The applicant argues that the proposal is only 7 storeys or approximately 22 metres taller than the extant scheme and that the proposals do step down from the central point of the cluster

meeting the objectives of the policy. Officers fundamentally disagree with this approach and conclusion for assessing the proposed scheme.

- 7.94 Officers conclude that the proposal fails to comply with London Plan policy D9 and Local Plan tall buildings policy D.DH6 which provide detailed guidance on tall buildings, as well as Local Plan policy S.DH1 which requires development to be of an appropriate height and scale in its site and context.

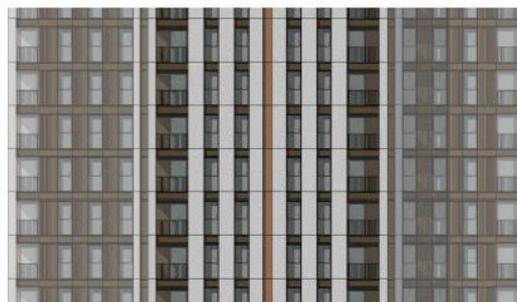
#### Appearance & Ground Floor Frontages

- 7.95 Tower Hamlets Local Plan 2031 policy D.DH6 requires developments with tall buildings to achieve exceptional architectural quality and provide shared facilities at the ground floor level to encourage social cohesion.
- 7.96 The proposed building is made of three distinctive sections, as shown in the image below. The bottom part of the building represents a two storey podium base. The middle part is the largest as it covers the residential levels above the podium level, from which it would appear separated due to the 2<sup>nd</sup> storey external amenity spaces which wraps around the building and creates the visual break-up of different elements. Finally, the top of the building can be best seen on south and north elevations with the central part of the building creating a distinctive section.
- 7.97 Each elevation is broken into three elements with the outer elements appearing softer than the central element. The top of the south and north elevations would only have the central element projecting whilst the east and west elevations show the top of the building in full width.

South Elevation - Top



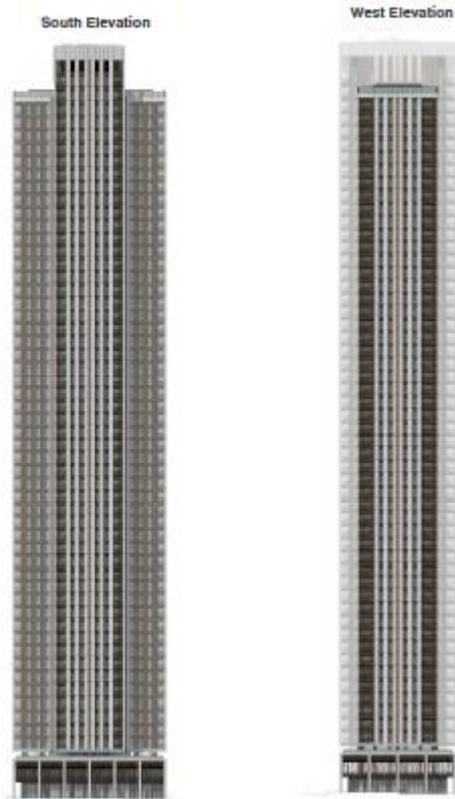
South Elevation - Typical Residential Levels



South Elevation - Base



*Figure 6. Proposed building façade arrangement.*



*Figure 7. Proposed south and west elevations.*

- 7.98 The applicant has explained the façade changes from the extant consent in the Design and Access Statement stating that some of the previously proposed materials could not be used given that they are made of combustible materials. This particularly relates to the laminated glass spandrel panels and balustrades.
- 7.99 The proposed ground and first floor of the building would form part of the podium which would be differentiated from the rest of the tower with vertical glazing panels on both floors and copper coloured screen wrapping around the first floor. This is further emphasised by the step in on the second floor of the building which provides an outdoor terrace for the proposed communal and child play space, and clearly differentiates the podium from the upper elements of the tower.



*Figure 8. View from the proposed open space of the proposed podium of the building and second floor terrace.*

- 7.100 In terms of the proposed materials, no objections have been raised by the LBTH borough urban design officer. In the event of a successful application, further details would have been secured via condition.
- 7.101 With regards to the appearance of the ground floor frontages, the market residential access is proposed in the north-western part of the proposed building, opening onto the landscaped area. The affordable housing access is situated in the south-eastern corner of the building and would be accessed from Marsh Wall.
- 7.102 The applicant has previously proposed the market and affordable housing entrances next to each other, overlooking the landscaped area; however, there were concerns with this arrangement as well as it was not considered to be genuine given that the entrances were divided by a wall between the two access points. The proposed access arrangement does not explore the opportunity of creating a single entrance for all residential tenures to promote social cohesion. Officers remain concerned that this could promote social exclusion, and although not a reason for refusal as it has previously been consented, this element of the scheme is not supported as it runs contrary to Policy S.SG2 and D.DH6 which seeks to increase opportunities for social interaction and social cohesion.
- 7.103 The ground floor frontage along Marsh Wall would be made of the proposed commercial floorspace which shows three units. The remainder of the ground floor along the eastern and northern elevations would contain the servicing spaces such as UKNP stations, a cycle storage access at the north-eastern corner, and refuse and management and parcel store.
- 7.104 Concerns have been previously in relation to the lack of active frontages along the Marsh Wall, to which the applicant responded to with the introduction of commercial units. However, Officers' concerns in relation to ground floor frontages remain, particularly along the northern and eastern elevations which would be mainly used for servicing purposes.
- 7.105 Nonetheless, it should be noted that servicing space should be provided in ground floor locations to ensure appropriate future operational and management activities.

#### Landscaping & Public Realm

- 7.106 London Plan (2021) policy D8 requires development proposals to ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, and easy to understand and maintain.
- 7.107 Tower Hamlets Local Plan policy D.DH2 requires developments to positively contribute to the public realm through the provision of active frontages and multi-usable spaces that can cater for social gathering and recreational uses.
- 7.108 The submitted Landscape Report sets out the overall landscaping vision, including the aim for a unified landscape between the application site and the adjoining Madison development. This would be achieved with proposed details, including hard and soft landscaping features that would build on the character of the completed open space of the adjoining Madison.
- 7.109 The proposed open space hardscaping would be a mix of paving and timber decking with safety play surfacing for the proposed child play space. The remaining public realm around the perimeter of the building would be particularly designed for pedestrian movement whilst a more robust appearance is proposed for vehicular movement.
- 7.110 The proposed soft landscaping would take the form of hedging, planting, lawn and trees, as seen in the image below. The landscaping would also incorporate the relevant wind mitigation measures.



Figure 9. Proposed landscaping.

7.111 Overall, the proposed approach for the creation of a unified public open space between the two development is strongly supported. The proposed details are considered acceptable and further details would have been secured via condition.

Safety & Security

7.112 The Metropolitan Police Designing Out Crime Officer has been consulted and provided site specific recommendations with regards to communal access control, fire access, doors and windows specifications, refuse and cycle storage and lighting. A condition has also been recommended in relation to obtaining Secured by Design accreditation.

7.113 The proposed publicly accessible open space would be overlooked from the residential entrances. In addition, Marsh Wall is a busy road and in conjunction with the delivery of the Skylines development to the south, the proposed development will provide additional commercial spaces along the road, contributing further to the perception of safety in the area.

Built Heritage

7.114 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. Development Plan policies require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.

7.115 The application is supported by a Built Heritage, Townscape and Visual Impact Assessment (BTHVIA) forming part of Volume 2 of the Environmental Statement, which provides an assessment of the impact from the proposed development on the townscape character of the immediate and surrounding area, as well as the impact from the proposed development

on heritage assets which have been identified within 600m radius from the centre of the application site.

#### *Heritage assets*

- 7.116 The site is not located within a conservation area, nor does it contain any listed buildings. Coldharbour conservation area is situated further to the east of the site, and its southern section includes a junction of Marsh Wall, East Ferry Road and Manchester Road. Further to the east along the River Thames sits the Grade II\* listed Isle of Dogs Pumping Station. To the north, on the opposite side of the dock entrance is a row of Grade II listed buildings.
- 7.117 The application site would have a visual connection to these heritage assets, however, the impact on them is not considered to be harmful.

#### *Strategic views*

- 7.118 London Plan policy HC4 provides requirements on the London View Management Framework (LVMF). The policy states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements, as well as the preservation of the landmarks of World Heritage Sites (WHS). Development proposals in designated views should comply with the relevant criteria set out in the policy.
- 7.119 Tower Hamlets Local Plan 2031 policy D.DH4 reiterates the requirement to comply with the LVMF requirements and the WHS Management Plans. Furthermore, the policy requires development to positively contribute to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf; and preservation or enhancement of the skyline of strategic importance in the borough-designated views. In addition, this policy requires development to demonstrate how they preserve or enhance townscape and views to and from the site which are important to the identity and character of the place.
- 7.120 Tower Hamlets Local Plan 2031 policy D.DH5 particularly requires proposals affecting the wider setting of the Maritime Greenwich WHS or those impinging upon strategic or other significant views to or from these sites should conserve and enhance the outstanding universal value of the world heritage sites.
- 7.121 Local Plan policy D.DH4 defines Canary Wharf as Skyline of Strategic Importance (SSI), as shown in the figure below. The Canary Wharf SSI has become a globally recognised silhouette and is a prominent and recognisable feature in views from the surrounding areas, including from a number of designated views, including local ones identified in policy D.DH4, as well as strategic ones set out in the LVMF.
- 7.122 The SSI area covers the two tall building zones in Canary Wharf which include Canary Wharf cluster and Millwall Inner Dock cluster. Policy D.DH4 states that building heights within the designation area should significantly step down towards its boundaries.
- 7.123 The application site is situated within the south-eastern part of the SSI and is shown with a black dot in the figure below.

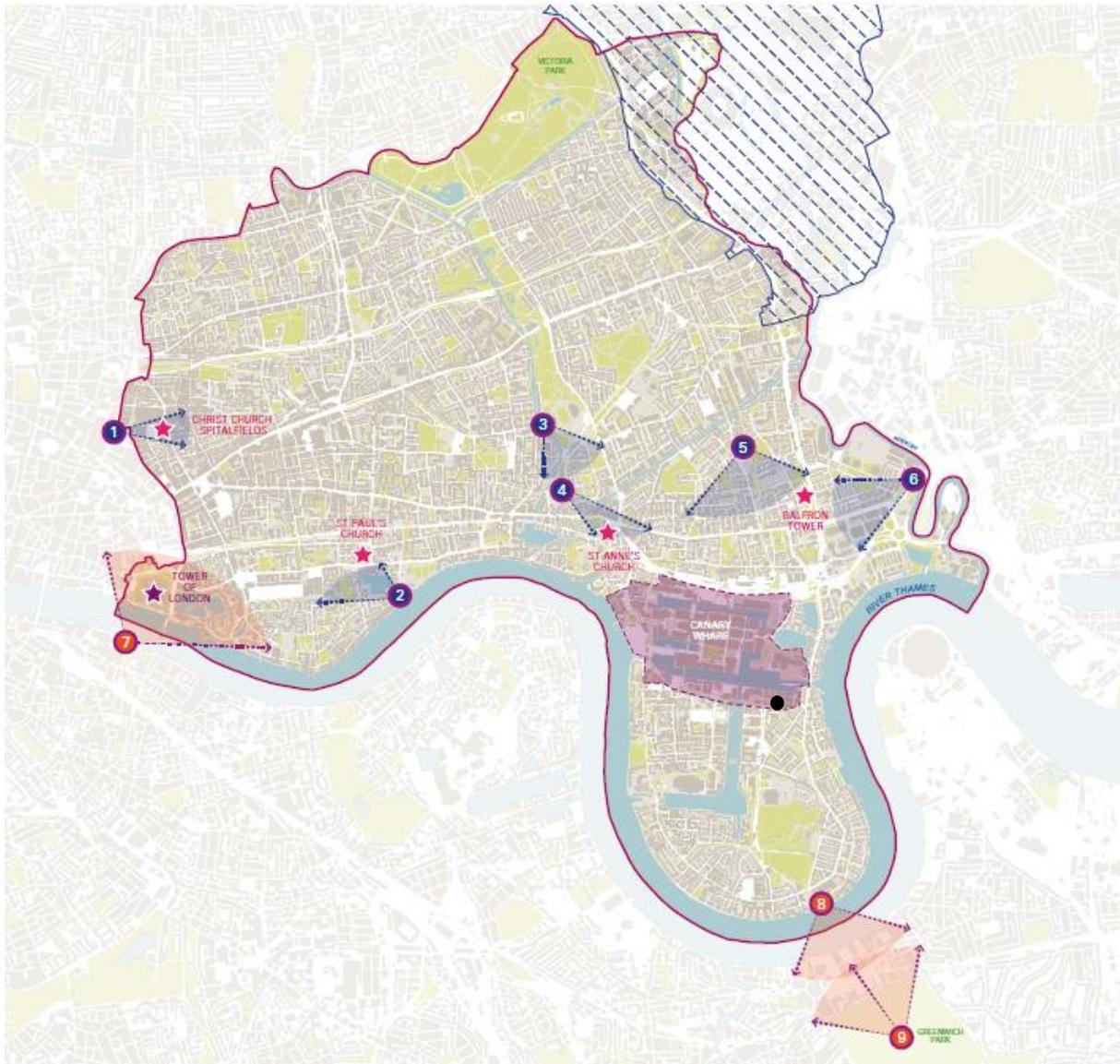


Figure 10. Key views, landmarks and the skyline of strategic importance – Tower Hamlets Local Plan 2031 policy D.DH4.

- 7.124 As noted in the Townscape, Heights and Massing section above, the proposal fails to meet the requirements set out in Local Plan policy D.DH6 which sets out the objectives and principles for the Canary Wharf Tall Building Zone (TBZ).
- 7.125 As a result of the proposed building's height, the lack of a step down approach and varying heights, as well as the creation of a table top of buildings, the proposed development would cause harm to the townscape and a harmful impact to the Canary Wharf Skyline of Strategic Importance. This is particularly evident when viewing the SSI from the Queen's House and Greenwich Park.
- 7.126 In addition, views from the north-east looking across between Dollar Bay and the Madison also highlight the importance of the site in the composition of the cluster and the SSI.
- 7.127 The level of harm is considered to be significant given that the proposal fails to meet a number of policies which stipulate the importance of the Canary Wharf townscape area and Skyline of Strategic Importance.

#### Archaeology

- 7.128 The application site lies within an Archaeological Priority Area and the proposed development would include significant excavation to make space for the proposed

basement. As such, the application has been referred to the Greater London Archaeological Advisory Service (GLAAS) for comment.

7.129 Chapter 12 of the Environmental Statement focuses on archaeology and provides the relevant details with regards to the impact from the proposed scheme. In order to manage any harm to archaeological remains, a condition as suggested by GLAAS would have been secured.

### Neighbour Amenity

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

### Daylight, Sunlight & Overshadowing

7.131 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).

7.132 For calculating daylight to neighbouring residential properties affected by the proposed development, 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 whether buildings maintain most of the daylight they currently receive.

7.133 BRE guidance in relation to VSC requires an assessment of the amount of daylight striking the face of a window. The VSC should be at least 27%, or should not be reduced by more than 20% of the former value, to ensure sufficient light is still reaching windows. The NSL calculation takes into account the distribution of daylight within the room, and again, figures should not exhibit a reduction beyond 20% of the former value.

7.134 A window is considered to be noticeably affected in terms of sunlight if a point at the centre of the window receives in the year less than 25% of the Annual Probable Sunlight Hours (APSH), including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period. Sunlight is relevant to main living rooms (i.e. habitable rooms) of dwellings and conservatories, if they have a window facing within 90 degrees (o) of due south.

7.135 The BRE guidelines state that if the room has multiple windows on the same or on adjacent walks, the highest value of APSH should be taken.

7.136 The table below shows the LBTH numerical classifications that are required to be applied for Negligible, Minor Adverse, Moderate Adverse and Major Adverse bandings for daylight (VSC and NSL) and sunlight (APSH and WPSH).

<b>Reduction to daylight (VSC &amp; NSL) and Sunlight (APSH &amp; WPSH)</b>	<b>Effect classification</b>
0 – 20% reduction	Negligible effect
20.1% - 30% reduction	Minor adverse effect
30.1% - 40% reduction	Moderate adverse effect
Above 40% reduction	Major adverse effect

*Table 7. Daylight and sunlight effect classification.*

7.137 The applicant has submitted a Daylight, Sunlight and Overshadowing Assessment in support of the application, prepared by Point 2, which has been included within Chapter 10 of the Environmental Statement (Volume 3, Annexes). The Council's external consultants, Delva Patman Redler (DPR), have reviewed the submitted information and agreed that the

applicant used appropriate methodology. This has also been stated by the Council's external consultants Temple, who carried out the review of the Environmental Statement.

7.138 The submitted Assessment includes five scenarios assessing the impact on the daylighting and sunlighting conditions and overshadowing to the surrounding open spaces and amenity areas. These include the following:

1. Pre-demolition baseline VS the proposed development;
2. Current temporary baseline VS the proposed development;
3. Current temporary cumulative baseline VS the proposed development;
4. Extant consent cumulative baseline VS the proposed development; and
5. The 2018 extant consent VS the proposed development.

7.139 Scenarios 1 and 2 form the main basis for the assessment whilst remaining Scenarios 3 and 4 consider the cumulative impact. Scenario 5 compares the extant consent (2016 ES) and the proposed development (current ES). As stated in the ES, recently consented schemes which are expected to be completed in advance of the proposed development have been included in the cumulative scenarios.

7.140 The image below shows the location of the neighbouring properties in the area included within the assessment. The site is shown in yellow, existing properties are shaded in pink, whilst the consented properties and the ones in construction are shown in purple.



*Figure 11. Location of assessed neighbouring properties.*

7.141 For Scenarios 1 and 2, there would be negligible to minor adverse effects in daylighting and sunlighting conditions to neighbouring properties. Similarly, negligible to minor adverse impacts would be experienced to surrounding gardens and amenity areas with respect to overshadowing.

7.142 Similarly, for Scenario 4, all properties would experience a negligible effect in daylighting and sunlighting conditions. All analysed amenity areas would also experience negligible overshadowing.

7.143 The assessment within the Officer's report focuses on the remaining Scenarios which include cumulative effects and comparison with extant consent. Properties which would experience a moderate and major adverse effect to their daylighting and sunlighting conditions are included in the assessment below.

## Daylight

7.144 In Scenario 3, only 8 out of 28 properties would experience a change when compared to Scenarios 1 and 2. As shown in the table below, only 4 of these would experience moderate adverse impact to their daylighting conditions. 2 out of the remaining 4 properties would experience minor adverse effects whilst the other 2 would experience an improvement from minor adverse to negligible effects. The moderate adverse impacts are discussed further below.

Address	Significance of daylight effects	Significance of sunlight effects
8. 24 East Ferry Road	Negligible > Minor adverse	N/A
12. 6, 14 Chipka Street	Minor adverse > Moderate adverse	N/A
13. 7, 15 Chipka Street	Minor adverse > Moderate adverse	N/A
14. 8, 16 Chipka Street	Minor adverse > Moderate adverse	N/A
15. 9, 17 Chipka Street	Minor adverse > Moderate adverse	N/A
19. 13, 21 Chipka Street	Minor adverse > Negligible	N/A
25. Antilles Bay	Minor adverse > Negligible	Minor adverse (no change)
27. Meridian Gate	Negligible > Minor adverse	Negligible > Minor adverse

Table 8. Significance of daylight and sunlight effects for Scenario 3.

7.145 In relation to Scenario 5, which looks at the additional impact representing the difference between the extant and proposed schemes, 25 out of 28 analysed properties would experience minor adverse impact to their daylighting conditions. The amount of additional impact would not be greater than 1.24% of VSC, where minor adverse impact is classified as up to 10% of changes to the VSC.

### 6-9 and 14-17 Chipka Street

7.146 The subject properties are situated to the south-east of the application site and are arranged in maisonette properties in a terrace which runs north-east to south-west. Within each property, all of the analysed windows serve either a kitchen or a bedroom.

7.147 Analyses of both VSC and NSL have been carried out for each of the properties. In relation to VSC, all of the windows within properties would experience a loss greater than 20% of the former VSC value. With regards to NSL, three out of four analysed windows would experience a loss greater than 20% of the former NSL value.

7.148 However, it should be noted that none of the windows for these properties meet the minimum VSC criteria of 27% in any of the Scenarios' baselines. In Scenarios 1 and 2, these properties meet NSL in excess of 80% in the Scenarios' baselines, but this drops down in cumulative scenarios, as demonstrated in the table below.

Property	Total No. of rooms	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
6, 14 Chipka Street	4	4	4	3	1	1
7,15 Chipka Street	4	3	3	3	1	1
8,16 Chipka Street	4	4	4	2	1	4
9, 17 Chipka Street	4	3	3	1	1	3

Table 9. Windows receiving NSL in excess of 80% in the Scenarios' baselines.

7.149 The reported baseline for Scenario 3 includes additional massing of the cumulative schemes which reduce the overall levels of daylight and sunlight so that when the proposed development is introduced the impact would be magnified.

7.150 However, as mentioned above, this would also result in some lesser impacts which would mask the impact from the proposed development as a result of the incorporation of the cumulative schemes in the baseline.

#### Sunlight

7.151 In Scenario 3, a total of 3 out of 14 analysed properties would experience minor adverse effects with regards to their sunlighting conditions. Out of these, only one property, Meridian Gate (The Madison), would experience deterioration from negligible to minor adverse effects.

7.152 For Scenario 5, all properties apart from Meridian Place would experience negligible additional impact in terms of sunlight when comparing the extant and proposed schemes. Meridian Place would experience an overall minor adverse impact. 1 out of 179 analysed windows within this property would experience moderate adverse impacts; however, this would amount to only 1% reduction in APSH.

#### Overshadowing

7.153 BRE guidance suggests that for a space to appear sunlit throughout the year, at least 50% of the amenity area should receive at least 2 hours of direct sunlight on 21<sup>st</sup> March. It states that the “availability of sunlight should be checked for all open spaces”, which usually includes gardens, sitting-out areas, parks or playgrounds.

7.154 In Scenario 3, the impact to overshadowing of the surrounding amenity spaces would be negligible for 28 amenity areas, and major adverse for 2 amenity areas. The two worst affected amenity spaces would be Meridian Place Roof Terrace 4 and Meridian Place Courtyard.

7.155 It should be noted that only 15% of the area within the Meridian Place Roof Terrace 4 would receive at least 2 hours of sunlight on 21<sup>st</sup> March within the baseline for Scenario 3, whilst this decreases to 14% of the area for the Meridian Place Courtyard within the same baseline. In addition, the deterioration of the overshadowing impact to these two spaces would be a result of the additional massing.

7.156 With regards to Scenario 5, the overshadowing impact to surrounding amenity spaces would be negligible for 29 amenity areas and beneficial for 1 amenity area. The improvement would be made to the garden space of 609 Manchester Road situated to the north-east of the application site.

#### Conclusion on Daylight, Sunlight and Overshadowing

7.157 Officers have had regard to the daylight and sunlight results in respect to the analysed properties, as listed above. For all Scenarios, the majority of properties would experience negligible to minor adverse impacts in terms of the deterioration of daylighting and sunlighting conditions had overshadowing to amenity spaces and gardens.

7.158 The identified harm to the surrounding properties through the loss of daylight and sunlight, as well as overshadowing to some areas is not considered sufficient to form a standalone objection to the proposed development. As such, the identified impact is considered acceptable on balance.

#### Overlooking, Outlook and Sense of Enclosure

7.159 Tower Hamlets Local Plan policy D.DH8 indicates a distance of approximately 18 metres between windows of habitable rooms in order to reduce inter-visibility between these to an acceptable level.

7.160 The proposed building would benefit from appropriate separation distances from the nearest properties to the north, west and south due to the width of roads and positioning of buildings. To the east of the site, the existing building at 227 Marsh Wall sits 10.5m from the proposed

building which is considered appropriate for the future proofing of the potential redevelopment of the site.

#### Noise & Vibration

- 7.161 The relevant information relating to noise and vibration impact from the proposed development is contained within Chapter 9 of the Environmental Statement which confirms that no likely significant adverse effects have been identified.
- 7.162 The Council's noise officer reviewed the information and raised no objections. Standards conditions regarding demolition and construction restricts (s61) and plant noise details would have been secured via conditions.

#### Construction Impacts

- 7.163 Demolition and construction activities are likely to cause additional noise and disturbance to the surrounding area, including additional traffic generation, noise and dust. Details for minimising these impacts, including mitigation measures set out in the ES, would have been secured via condition under the submission of a detailed Construction Environmental Management and Logistics and Plan, which would have also been publicised and communicated with residents as stipulated by Neighbourhood Plan policies CC1 and CC2.
- 7.164 In addition, financial contributions would have been secured towards development co-ordination and integration as set out in the Planning Obligations SPD.

#### **Transport**

- 7.165 Development Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.
- 7.166 The application is accompanied by a Transport Assessment which forms part of Chapter 7 of the Environmental Statement.

#### Vehicular, pedestrian and cycle access

- 7.167 The main pedestrian access to the proposed development would be from Marsh Wall. From the north, access is available from Lord Armory Way and Meridian Place. The proposed access to the cycle storage would be from Meridian Place.
- 7.168 The proposed vehicle access would be from Marsh Wall into the eastern street immediately adjacent to the site. LBTH highways officer raised concerns in relation to the opening of a road onto Marsh Wall due to potential conflict points. However, given the constraints of the site, as well as the need for appropriate servicing arrangements, which would happen to the north of the site, this is considered acceptable on balance.

#### Deliveries & Servicing

- 7.169 The proposed development would be serviced from Meridian Place. In terms of deliveries, there is a dedicated Management and Parcel Store along the northern section of the ground floor. No objections are raised to the proposed arrangement given that Meridian Place is a private road, and the applicant will be responsible for any required enforcement activities during the operation.
- 7.170 The submitted draft Service Management Plan (SMP) is considered acceptable and a full SMP would be secured via condition.

#### Car Parking

- 7.171 London Plan policy T6.1 requires residential developments in Inner London areas with PTAL 4 to 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.

- 7.172 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.
- 7.173 The proposed development has been designed as car free with the provision of a total of 4 accessible parking spaces, out of which 1 would be located on Meridian Place to north of the proposed building whilst the remaining 3 accessible bays are proposed within the access street to the east of the proposed building.
- 7.174 The proposed spaces represent only 1% provision of accessible bays. It has been noted that Marsh Wall is unsuitable for accessible bays and as such, further provision would need to be situated further to the south of Marsh Wall.
- 7.175 Whilst the proposed provision of 1% is below the 3% minimum policy requirements, it is considered acceptable on balance given that a condition would have been secured for further provision to be demonstrated, along with the proposed management of these spaces.

#### Cycle Parking and Facilities

- 7.176 London Plan policy T5 sets out the minimum cycle storage requirements for each of the land uses. For residential developments, 1 space should be provided per studio and 1bedroom 1person units, 1.5 spaces for 1bedroom 2person units, and 2 spaces for all other dwellings. With respect to short-stay spaces, a minimum of 2 spaces should be provided for the first 40 dwellings and 1 space per 40 dwellings thereafter.
- 7.177 For commercial spaces, the minimum requirement would be 1 long-stay space per 175 sqm of gross external area (GEA). For commercial units over 100 sqm, 1 short-stay space should be provided per 20 sqm of GEA.
- 7.178 The proposed development would generate a minimum policy requirement of 684 long-stay cycle spaces and 11 short-stay cycle spaces for the residential component. For the proposed commercial use, 1 long-stay space and 8 short-stay spaces should be provided.
- 7.179 In terms of long-stay spaces, the applicant has confirmed that 690 cycle spaces will be provided within the basement and further 11 spaces would be provided on Levels 13, 14 and 16. A total of 14 short-stay cycle spaces are proposed at the south-eastern corner of the building adjacent to the southern most accessible bay and within the landscaping along the western part of the site.
- 7.180 The proposed cycle storage would include a mix of cycle stands, including 36 two-tier stands providing 72 spaces, 10 racks with additional spaces available for adaptation to adapted/larger cycles, while the rest would be semi-vertical stands.
- 7.181 The Council's highways officer objects to the proposed semi-vertical type of cycle stands due to their lack of accessibility to cater for all users or cycles. The proposed semi-vertical stands are not inclusive to all and would prevent people with mobility or strength issues from using them. Further details would have been requested via condition to ensure that these spaces are inclusive, as suggested by the applicant.
- 7.182 Whilst the proposed development would a policy compliant quantum of spaces, the proposed mixes of cycle spaces is not considered to be suitable. However, on balance, it is considered that this would not warrant a refusal on the proposed cycle storage.

#### Trip generation

- 7.183 The removal of the previous parking on the site is welcomed as it contributed towards the reduction of vehicle trips on the road network. No objections were raised by the LBTH highways officer in relation to the submitted trip generation details.

### Travel Planning

- 7.184 The application is supported by a draft Travel Plan setting out the details of the travel planning for the proposed development. No objections are raised, and a final Travel Plan would be secured via condition.

### Active Travel Zone and Healthy Streets

- 7.185 The applicant has carried out an Active Travel Zone assessment which identifies improvements identified along the route to improve the pedestrian and cyclist environment in the area and to improve the links to existing infrastructure. These would have been secured via planning obligations if the application was recommended for approval.

### Summary

- 7.186 Whilst the majority of transport matters relating to the proposed development are considered acceptable, the main issue represents the lack of sufficient cycle storage spaces for future occupants.

## **Environment**

### Environmental Impact Assessment

- 7.187 The planning application represents Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES) coordinated by Trium.
- 7.188 Regulation 3 prohibits the Council from granting planning permission without consideration of the 'environmental information' that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the development.
- 7.189 The submitted ES assesses the environmental impacts of the development under the following topics:
- Socio-economics and Health;
  - Transport;
  - Air Quality;
  - Noise and Vibration;
  - Daylight, Sunlight, Overshadowing and Solar Glare;
  - Wind Microclimate;
  - Archaeology;
  - Greenhouse Gas Emissions;
  - Heritage, Townscape and Visual Impact;
  - Climate Change.
- 7.190 The ES has been reviewed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations).
- 7.191 The Council appointed Temple Group to independently examine the ES to confirm whether the ES satisfies the Regulations. This review consisted of the following documents: Interim Review Report (version 2.0 dated July 2021), Final Review Report 001 (version 3.0 dated August 2021) and Final Review Report 002 (version 3.0 dated November 2021).

- 7.192 The application has been supported by an ES and Non-Technical Summary (NTS) (dated 6<sup>th</sup> October 2021), an ES Interim Review Report Response (dated 28<sup>th</sup> July 2021), ES Final Review Report Response (dated 31<sup>st</sup> August 2021), and a Wind Mitigation Measure Compliance Review – EIA Clarification Note (dated 18<sup>th</sup> November 2021).
- 7.193 The ES reported moderate adverse likely significant effects with respect to archaeology as a result of the basement and other ground works during construction phase. As suggested by GLAAS, a condition would have been secured to manage the effect.
- 7.194 In terms of other likely significant effects, this includes negligible to moderate adverse effects to townscape as a result of construction works. It should be noted that the ES reported these would be temporary and short-term in terms of duration. Cumulative significant adverse effects are also reported regarding greenhouse gas emissions and daylight and overshadowing.
- 7.195 Several beneficial likely significant effects have reported in the ES in relation to transport, townscape and visual impact. All of these would be permanent and long term likely significant effects in terms of their duration. Due to the subjective nature of the assessment townscape and visual assessment, LBTH has considered whether the conclusions are agreed with in determining the application.
- 7.196 The Council's EIA officer and the Council's appointed EIA consultants have confirmed that the submitted ES (including the subsequently submitted ES information) meets the requirements of the EIA Regulations and as such, is considered adequate.
- 7.197 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the proposed development, which forms the basis of the assessment presented in the report.
- 7.198 Appropriate mitigation and monitoring measures as proposed in the ES would have been secured through planning conditions and/or planning obligations. The environmental information comprises the ES, including any further information and any other information, any representations made by consultation bodies and by any other person about the environmental effects of the Proposed Development.

#### Air Quality

- 7.199 London Plan policy S11 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.
- 7.200 With regards to the construction impact, the Isle of Dogs Neighbourhood Plan policy CC3 requires the compliance with the GLA's Dust and Emissions SPG
- 7.201 The information relating to air quality is contained within Chapter 8 of the ES which confirms the proposed development has been designed to be air quality neutral.
- 7.202 No objections were received from the Council's air quality officer, subject to the proposed conditions to prevent dust nuisance and air pollution during construction and operational stages, which would have been secured in the event of a successful proposal and as such, would have been in accordance with the relevant policies.

#### Biodiversity

- 7.203 London Plan policy G6 and Tower Hamlets Local Plan D.ES3 require developments to protect and enhance biodiversity. In addition, London Plan policy G5 recommends a target score for Urban Greening Factor (UGF) of 0.4 for predominantly residential development.

- 7.204 The application site consists largely of demolished buildings given that the extant planning permission has been implemented. In addition, the previously existing trees along Marsh Wall have been already removed.
- 7.205 The Council's biodiversity officer analysed the submitted information. Whilst extensive areas of planting and greenery are proposed, the main concern is about the proposal meeting the Local Biodiversity Action Plan targets. It has been suggested to secure further details on biodiversity enhancements via condition.
- 7.206 The submitted Urban Greening Factor report indicates that the proposal would achieve a UGF of 0.32, which is lower than the recommendation in the London Plan. As such, the proposal is not in accordance with London Plan policy G5.

#### Energy & Environmental Sustainability

- 7.207 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)
- 7.208 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.

#### *Energy*

- 7.209 At a national level, the National Planning Policy Framework sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The climate change policies as set out in the London Plan 2021 and the Borough's Local Plan Policy D.ES7 collectively require new development to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 7.210 Policy SI2 of the London Plan requires major development to be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- Use Less Energy (Be Lean);
  - Supply Energy Efficiently (Be Clean);
  - Use Renewable Energy (Be Green); and
  - Monitor and report (Be Seen).
- 7.211 Local Plan Policy D.ES7 requires zero carbon emission development to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site, and the remaining regulated carbon dioxide emissions to 100%, to be off-set through a cash in lieu contribution. This is applicable to all developments.
- 7.212 The application is supported by a Sustainability and Energy Statement by Burro Happold which has been reviewed by the LBTH energy and sustainability officer.
- 7.213 The proposed measures for carbon savings represent energy efficiency measures and the use of an air source heat pump communal system. Whilst no renewable energy generating technologies are proposed, it is considered that the roof area could accommodate the

installation of photo voltaic panels, as confirmed by the LBTH energy and sustainability officer.

- 7.214 The proposed measures would result in an on-site CO<sub>2</sub> reduction of 231.7 tonnes. The remaining 153.8 tonnes of CO<sub>2</sub> would be offset by a financial payment in lieu which would amount to £438,330, based on the £95 per tonne rate as identified in the London Plan.
- 7.215 The application site is identified as being within a Heat Network Priority area and in close proximity to the Barkantine Heat Network. Due to the Council's decarbonisation of heat supplied via Barkantine and the expansion of network to meet increasing heat supply demands of new developments, the proposed development should continue to engage and establish the feasibility and viability of the connection. This would have been secured via planning obligation.

#### *Environmental sustainability*

- 7.216 Policy D.ES6 requires new residential development achieve a maximum water use of 105 litres per person per day, to minimise the pressure on the combined sewer network and to demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development, taking into consideration the cumulative impact of current and proposed development.
- 7.217 Local Plan Policy D.ES7 states 'All new non-residential development over 500 square metres floorspace (gross) are expected to meet or exceed BREEAM 'excellent' rating'. In addition, Local Plan policy D.ES7 and Neighbourhood Plan policy SD1 encourage residential buildings to meet the Home Quality Mark.
- 7.218 Isle of Dogs Neighbourhood Plan policy D1 requires high density residential developments to submit an Infrastructure Impact Assessment.
- 7.219 The proposed scheme would fall under the relevant 500sqm threshold for non-residential uses and as such, no BREEAM would be required. The use of Home Quality Mark would have been secured via condition.
- 7.220 The applicant has not submitted a standalone Infrastructure Impact Assessment; however, a letter addressing this policy has been submitted and includes the relevant information in relation to the infrastructure impact from the proposed development, which has also been included in other documents such as the ES and Health Impact Assessment.
- 7.221 The indicated infrastructure impacts are likely to be similar to the extant consent in terms of impact on infrastructure, and as such are considered to be acceptable. Relevant mitigation measures would have been secured via planning obligations and through the CIL monies, which is in accordance with the neighbourhood plan policy.

#### Flood Risk & Drainage

- 7.222 Tower Hamlets Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drain is 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.
- 7.223 A standalone Flood Risk Assessment has been submitted by the applicant. The Environment Agency was consulted and concluded that the development would be at a low risk of tidal and fluvial flooding. The FRA has also taken into consideration the surface water and it has been informed by the Surface Water Drainage Strategy.
- 7.224 The proposed development is considered acceptable with respect to flood risk and drainage. A standard condition would have been secured in relation to details on suds.

#### Health Impact Assessment

- 7.225 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.

- 7.226 An HIA document has been submitted as part of Chapter 6 (Socio-Economics) of the ES, which has been reviewed by the Council's HIA officer.
- 7.227 The HIA found positive health benefits as a result of the proposed development such as the delivery of housing and employment, a new public garden and the incorporation of sustainable design measures.
- 7.228 A number of mitigation measures have been identified to mitigate potential negative health impacts during construction and operational phases of the development. In the event of a successful application, these would have been secured as planning conditions and obligation.

#### Land Contamination

- 7.229 The application site is situated on potentially contaminated land; however, it should be noted that the extant planning permission has been implemented on the site. This included the approval of the relevant conditions relating to ground contamination.
- 7.230 The Council's contaminated land officer stated that the submitted information is considered sufficient and that no further information is required.

#### Waste

- 7.231 Policy D.MW3 of the Local Plan (2020) requires adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements. Part of the policy requires new major residential development to incorporate high quality on-site waste collection system that do not include traditional methods of storage and collection. The policy further explains that the Council is seeking to move away from the traditional waste storage methods, including Euro bin containers.
- 7.232 The Council's Reuse, Recycle and Waste SPD was adopted in July 2021. The document sets out design guidelines regarding waste management for new residential developments, and provides a decision tree to ensure that the correct waste storage and collection methods are chosen for developments.
- 7.233 The High Density SPD also provides a set of guidelines for high density scheme. In relation to waste, design guidelines AB.14 states that traditional waste systems will be resisted.
- 7.234 The submitted Delivery and Servicing Plan provides details on refuse collection. The proposed development would use Eurobins, situated on the ground and basement floors. The proposed collection of waste would occur twice a week, which is not the Council's preferred method for high density developments.
- 7.235 The LBTH waste officer has objected to the proposed use of Eurobins and twice a week collection, which are not in line with the latest policy requirements and are not supported by the Council.
- 7.236 The applicant has provided supporting evidence justifying why the proposed scheme is unable to use alternative and non-traditional waste collection methods. In addition, the applicant has provided additional information regarding the waste management during collection time, internal storage arrangements within proposed units, communication with occupants and management of bulky waste.
- 7.237 The consented scheme has been approved on the basis of a twice a week collection. The proposed development seeks to utilise the sub structures and footprint of the extant permission for waste storage and collection arrangements. Whilst the Council's requirements have significantly changed since then, including through the adoption of new planning policies which require non-traditional waste collection methods, it is not considered

that there would be significant additional harm in terms of waste collection to constitute a reason for refusal, based on the submitted information.

### Wind/Microclimate

7.238 The relevant information relating to wind microclimate is included as part of Chapter 11 of the ES which confirms that no likely significant wind effects have been identified as a result of the proposed development.

7.239 A number of mitigation measures would be secured through landscaping, inclusion of solid balustrades, dense planting and canopies in different locations to ensure that all spaces are fit for their use. As a result, no adverse residual effects have been noted.

### **Planning Balance**

7.240 This section examines the overall planning balance of the proposed scheme and considers public benefits against the harm caused to the townscape and the Canary Wharf Skyline of Strategic Importance, as well as conflicts with other relevant policies of the Development Plan. The overall planning balance also takes into consideration the extant scheme which is currently under construction.

7.241 When compared to the extant scheme, the proposal would deliver 58 additional residential units and increase the height of the building from 49 storeys to 56 storeys. The consented scheme included an affordable housing of 25% whilst the proposed scheme seeks to increase this to 26.6%.

7.242 The proposed scheme would deliver additional homes, including affordable homes, which weigh in favour of granting permission. However, it should be noted that the proposal is still far away from the minimum policy requirement of 35% of affordable housing. Whilst there is no dispute on the submitted viability evidence, the additional affordable housing units only make a difference of 1.6% of overall homes that will be delivered on the site with the proposed scheme when compared to the consented scheme.

7.243 It should be noted that the proposed housing mix includes a family sized affordable rented offer of 46% which is welcomed, however, this would be slightly over the minimum policy requirements of 45%.

7.244 The proposed scheme would secure a greater carbon reduction, including the introduction of air source heat pumps (ASHP) instead of Combined Heat and Power (CHP) as secured in the consented scheme. However, given the adoption of the new Local Plan, as well as the wider decarbonisation agenda, CHPs are no longer considered acceptable in general and as such, the use of ASHPs would represent a policy compliance. As such, this element is given neutral weight in the planning balance.

7.245 Similarly, the proposed scheme would deliver additional child play space which the applicant is demonstrating as a benefit. It should be noted that the consented scheme falls short in the delivery of child play space, and the proposed scheme meets the minimum policy requirement for child play space. Similarly, this element is given neutral weight.

7.246 The proposal secures the least preferred option for waste management and collection method. Similarly, the proposed scheme would have an Urban Greening Factor of 0.3 when compared to a policy suggestion of minimum 0.4 for residential developments.

7.247 In addition to the above identified issues, the proposed building layout misses the opportunity to deliver positive social cohesion given that the market and affordable housing entrances are proposed separately.

- 7.248 A detailed design assessment is provided in the Design & Heritage section above. It is concluded that the proposed development would cause harm to the townscape and the Canary Wharf Skyline of Strategic Importance. This would result in the proposal's failure to meet a number of Development Plan policies relating to design and townscape.
- 7.249 It should be acknowledged that some additional construction phase and financial contributions would have been secured as a result of the proposed additional units. Similarly, additional CIL monies would have been secured for the additional floorspace within the proposed 7 storeys. However, it is not considered that these should be afforded great weight given that any additional development on the site would be required to provide these. In addition, the extant scheme has secured the majority of these benefits whilst not resulting in a number of policy failures.
- 7.250 The Council is able to demonstrate that the delivery of housing was substantially above 75% of the housing requirement over the previous 3 years (Housing Delivery Test) and hence the presumption in favour of sustainable development in paragraph 11d of the National Planning Policy Framework would not apply.
- 7.251 Overall, the proposed benefits arising from the proposed development, and mainly its additional benefits which would be supplementary to the extant scheme, are not considered to outweigh the proposal's failure to meet the London Plan and Local Plan policies relating to design of tall buildings and townscape impact.
- 7.252 Officers conclude that the proposed development should be refused.

#### **Infrastructure Impact**

- 7.253 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments and Mayor of London CIL.
- 7.254 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.

#### **Local Finance Considerations**

- 7.255 The proposal would have generated a New Homes Bonus payment.

#### **Human Rights & Equalities**

- 7.256 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.
- 7.257 Notwithstanding the issues identified in the above section of the report, the proposed new residential accommodation would meet inclusive design standards and 50 of the new homes are proposed as wheelchair accessible.
- 7.258 In addition, the proposed affordable housing would be of particular benefit to groups that are socially and/or economically disadvantaged. It should be noted that the additional benefit comes from an increase in affordable and wheelchair units when compared to the extant scheme which is already under construction.
- 7.259 To conclude, the proposed development would not result in adverse impacts upon human rights, equalities, or social cohesion.

### **8. RECOMMENDATION**

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

1. The proposed development, by virtue of its height and scale within its context and relationship to the height and scale of nearby tall buildings, would fail to provide a step down approach towards the edge of the Canary Wharf Tall Building Zone nor provide any substantial variation of heights in this part of cluster. The proposal would harm the character and distinctiveness of the Canary Wharf townscape and would cause harm to the designated Canary Wharf Skyline of Strategic Importance. The proposal is therefore contrary to policy D3 and D9 of the London Plan, policies S.DH1, S.DH3, D.DH4 and D.DH6 of the Tower Hamlets Local Plan 2031, and the Isle of Dogs and South Poplar Opportunity Area Planning Framework (2019). The public benefits of the development, including the provision of housing and affordable housing would not be sufficient to warrant a departure from the Development Plan policies for managing height and scale within the Tall Building Zone.
  
2. In the absence of a legal agreement to secure policy compliant financial and non-financial contributions including for affordable housing, employment, skills, training and enterprise, transport matters, public realm improvements including contributions towards active travel zone, and carbon offsetting contribution, the development fails to mitigate its impact on local services, amenities, infrastructure and environment. This is contrary to the requirement of policy DF1 of the London Plan, policy D.SG5 of the Tower Hamlets Local Plan 2031, and Planning Obligations Supplementary Planning Document (2021).

## APPENDIX 1 – List of Plans and Documents for Refusal

### Schedule of Drawings

Existing Site & Location Plan, Drawing No: 18942-DDU-225-00GL-DR-A-00000 P3  
Proposed Site & Location Plan, Drawing No: 18942-DDU-225-00GL-DR-A-00001 P5  
Proposed Basement Level B1, Drawing No: 18942-DDU-225-00B1-DR-A-83101 P7  
Proposed Basement Level B2, Drawing No: 18942-DDU-225-00B2-DR-A-83100 P4  
Proposed Ground Floor Plan, Drawing No: 18942-DDU-225-00GL-DR-A-83102 P10  
Proposed Level 1 Floor Plan, Drawing No: 18942-DDU-225-01-DR-A-83103 P4  
Proposed Level 2 Floor Plan, Drawing No: 18942-DDU-225-02-DR-A-83104 P4  
Proposed Level 03-05 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83105 P4  
Proposed Level 06-08 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83106 P4  
Proposed Level 9 Floor Plan, Drawing No: 18942-DDU-225-09-DR-A-83107 P4  
Proposed Level 10 Floor Plan, Drawing No: 18942-DDU-225-10-DR-A-83108 P5  
Proposed Level 11 Floor Plan, Drawing No: 18942-DDU-225-11-DR-A-83109 P4  
Proposed Level 12 Floor Plan, Drawing No: 18942-DDU-225-12-DR-A-83110 P4  
Proposed Level 13-14 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83111 P5  
Proposed Level 15 Floor Plan, Drawing No: 18942-DDU-225-15-DR-A-83112 P6  
Proposed Level 16 Floor Plan, Drawing No: 18942-DDU-225-16-DR-A-83113 P3  
Proposed Level 17-18 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83114 P4  
Proposed Level 19-37 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83115 P2  
Proposed Level 38 Floor Plan, Drawing No: 18942-DDU-225-38-DR-A-83116 P4  
Proposed Level 39 Floor Plan, Drawing No: 18942-DDU-225-39-DR-A-83117 P2  
Proposed Level 40-41 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83118 P2  
Proposed Level 42-52 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83119 P2  
Proposed Level 53 Floor Plan, Drawing No: 18942-DDU-225-53-DR-A-83120 P2  
Proposed Level 54 Floor Plan, Drawing No: 18942-DDU-225-54-DR-A-83121 P2  
Proposed Level 55 Floor Plan, Drawing No: 18942-DDU-225-55-DR-A-83122 P2  
Proposed Roof Level Floor Plan, Drawing No: 18942-DDU-225-RF-DR-A-83123 P2  
1-Bed Apartment Type 2 Floor Plan, Drawing No: 18942-DDU-225-XX-DR-A-83201 P4  
1-Bed Apartment Type 3 – M4(2) Wheelchair Unit, Drawing No: 18942-DDU-225-XX-DR-A-83202 P4  
1-Bed Apartment Type 4, Drawing No: 18942-DDU-225-XX-DR-A-83203 P4  
1-Bed Apartment Type 5, Drawing No: 18942-DDU-225-XX-DR-A-83204 P4  
1-Bed Apartment Type 6 – M4(3) Wheelchair Unit, Drawing No: 18942-DDU-225-XX-DR-A-83205 P4  
1-Bed Apartment Type 7, Drawing No: 18942-DDU-225-XX-DR-A-83206 P4  
1-Bed Apartment Type 8, Drawing No: 18942-DDU-225-XX-DR-A-83207 P4  
2-Bed Apartment Type 2, M(4)3 Wheelchair Unit, Drawing No: 18942-DDU-225-XX-DR-A-83208 P4  
2-Bed Apartment Type 3, Drawing No: 18942-DDU-225-XX-DR-A-83209 P4  
2-Bed Apartment Type 6, Drawing No: 18942-DDU-225-XX-DR-A-83210 P4  
3-Bed Apartment Type 2, Drawing No: 18942-DDU-225-XX-DR-A-83211 P4  
3-Bed Apartment Type 3, Drawing No: 18942-DDU-225-XX-DR-A-83212 P4  
3-Bed Apartment Type 4, Drawing No: 18942-DDU-225-XX-DR-A-83213 P4  
3-Bed Apartment Type 5, Drawing No: 18942-DDU-225-XX-DR-A-83214 P2  
3-Bed Apartment Type 6, Drawing No: 18942-DDU-225-XX-DR-A-83215 P2  
4-Bed Apartment Type 1, Drawing No: 18942-DDU-225-XX-DR-A-83216 P2  
North Elevation, Drawing No: 18942-DDU-225-XX-DR-A-84100 P3  
South Elevation, Drawing No: 18942-DDU-225-XX-DR-A-84101 P3  
East Elevation, Drawing No: 18942-DDU-225-XX-DR-A-84102 P3  
West Elevation, Drawing No: 18942-DDU-225-XX-DR-A-84103 P3  
Section AA, Drawing No: 18942-DDU-225-XX-DR-A-85100 P3  
Section BB, Drawing No: 18942-DDU-225-XX-DR-A-85101 P3  
Ground Floor Below Ground Drainage Layout, Drawing No: 5298-WAL-ZZ-GF-DR-D-3000 P02

Services Plan Overlay – Gas Pipes Locations, Drawing No: CPL-225-Log-114 A  
Cladding Details 1, Drawing No: 18942-DDU-225-XX-DR-A-84200 P2  
Cladding Details 2, Drawing No: 18942-DDU-225-XX-DR-A-84201 P2  
Cladding Details 3, Drawing No: 18942-DDU-225-XX-DR-A-84202 P1  
Cladding Details 4, Drawing No: 18942-DDU-225-XX-DR-A-84203 P1  
Cladding Details 5, Drawing No: 18942-DDU-225-XX-DR-A-84204 P1  
Bathroom Type WC-10 – Affordable Housing, Drawing No: 18942-DDU-225-XX-DR-A-74060 P3  
Shower Room Type BT-30 – Intermediate and Private Tenure, Drawing No: 18942-DDU-225-XX-DR-A-74030 P3  
Rectangular Balcony Detail sheet 2, Drawing No: BOA-2499-XX-DR-10001 D

### **Schedule of Documents**

Accommodation Schedule, Number: 18942-DDU-225-XX-SC-A-15122, dated 06.04.22.  
Affordable Housing Statement, May 2021  
Approved Crane Methodology, April 2021  
Approved Drainage Report, April 2021  
Approved Geoarchaeological Written Scheme of Investigation, April 2021  
Approved Phase II Site Investigation Scheme, April 2021  
Approved Piling Method Statement (Zone A), April 2021  
Approved Piling Method Statement (Zones B & C), April 2021  
Approved Remediation Strategy, April 2021  
Aviation Safeguarding Review, April 2021, P1222/R1 Rev. 02  
Biodiversity Net Gain Assessment, 16<sup>th</sup> April 2021  
Circular Economy Statement, 14<sup>th</sup> March 2021, Rev. P03  
Construction Environmental Management and Logistics Plan, 18<sup>th</sup> January 2021, Report Number 3, Rev. C  
Cycle Space Requirements  
Design and Access Statement (inc. Landscape report), 18942-DDU-225-XX-RP-A-00100 Rev. P8, 14<sup>th</sup> April 2021  
Environmental Statement, by Trium, 16<sup>th</sup> April 2021  
ES Interim Review Report Response, 28<sup>th</sup> July 2021  
ES Final Review Report Response, 31<sup>st</sup> August 2021  
ES Non-Technical Summary, October 2021  
Financial Viability Assessment, 16<sup>th</sup> April 2021  
Fire Safety Statement, September 2021, 20025n04.2 Rev. P2  
Fire statement form, 225 Marsh Wall  
Flood Risk Assessment, 16<sup>th</sup> April 2021  
Heritage and Townscape Statement, April 2021  
Housing Association Support Letter, dated 12<sup>th</sup> April 2021  
Landscape report, 30<sup>th</sup> September 2021, 18942-DDU-225-XX-RP-A-80002 Rev. P5  
London Sustainable Drainage Proforms v2019.02  
Planning Statement, April 2021  
Response to GLA Stage I Report, dated 12 October 2021  
Savills Letter dated 7 April 2022  
Statement of Community Involvement (SCI), April 2021  
Summary of Variations between Consented & proposed Scheme's Accommodation, by CPL  
Sustainability and Energy Statement, April 2021, 046738-BHE-225-XX-RP-EN-0002 Rev. P05  
Transport Assessment, April 2021, Report Number 1, Rev. P1  
TV & Radio Interference Assessment, Revision 00, 2016-09-21  
Urban Greening Factor, December 2020  
Verti45 Cycle stand specification  
Viability Letter by Avison Young, dated 19 November 2021  
Waste Strategy, 189420000, 2/03/2022  
Waste Management Strategy – Addendum, dated 21 June 2022  
Waste Management Strategy 001, June 2022, by WSP

Whole Life Carbon Assessment, 16<sup>th</sup> April 2021, 046738-BHE-225-XX-RP-SP-0001 Rev.  
P01

Wind Mitigation Measures Compliance Review – EIA Clarification Note, dated 25 November  
2021

## APPENDIX 2 – Existing photos

Application site in July 2022, viewed towards the east.



Application site in July 2022, viewed towards the west.





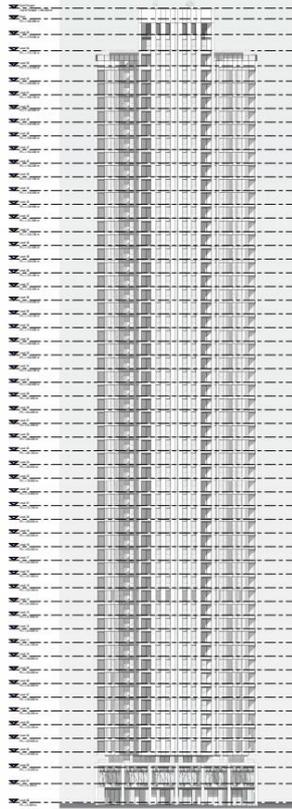
Proposed 2<sup>nd</sup> Floor Plan



Proposed Level 53 Floor Plan



Proposed South Elevation



Proposed East Elevation

