

#### DEVELOPMENT COMMITTEE

27th April 2023

Report of the Corporate Director of Place

#### **Application for Planning Permission**

click here for case file

Classification: Unrestricted

Reference PA/22/02551

Site 7-15 Blount Street, London E14 7RL

Ward St Dunstans

**Proposal** Demolition of the existing buildings on site and redevelopment to

provide 106 purpose-built student accommodation (PBSA) rooms, with associated internal and external amenity space and cycle parking.

alongside commercial space at the ground floor level.

Summary

Recommendation

Grant planning permission with conditions and planning obligations

**Applicant** Southern Grove

**Architect/agent** pH+ / Maddox and Associates

Case Officer Fran Haines

**Key dates** - Application registered as valid on 09/12/2022

- Public consultation finished on 01/02/2023

#### **EXECUTIVE SUMMARY**

The application comprises of the demolition of the existing structures and the erection of a 7-storey building providing commercial light industrial use (use Class E g iii) at ground floor, and student accommodation on floors 1-6. In addition, there will be associated landscaping, parking and facilities to support the proposed uses.

In land use terms, the proposed student led mixed use scheme is acceptable in this accessible location, being a short walk to numerous public transport options (DLR, national rail and bus) which provides easy access to a number of higher education institutions.

The proposed ground floor commercial space will be 'incubator maker space,' providing space for light industrial uses and workshop space. The commercial space would be a reprovision of the existing use on site. The proposed use would interact well with the student use proposed above and would create high quality workspace, which would be an improvement on the current space.

The height, massing and design has been carefully considered to respond to the local context and will not result in harmful impacts to the heritage assets in the locality. Whilst the proposal is for a 7-storey building, due to the design approach and set-backs, the development would appear as a 6-storey building from street level. The design finish is of high quality and would contribute positively to the street scene of Salmon Lane and Blount Street.

The proposal would result in some impacts upon neighbouring residents of 1-35 Rayners Terrace from a daylight and sunlight perspective. Officers are satisfied that the scale and massing has been designed to minimise such impacts and the benefits of the scheme would outweigh the harm caused. There will be some impacts on privacy of some existing windows

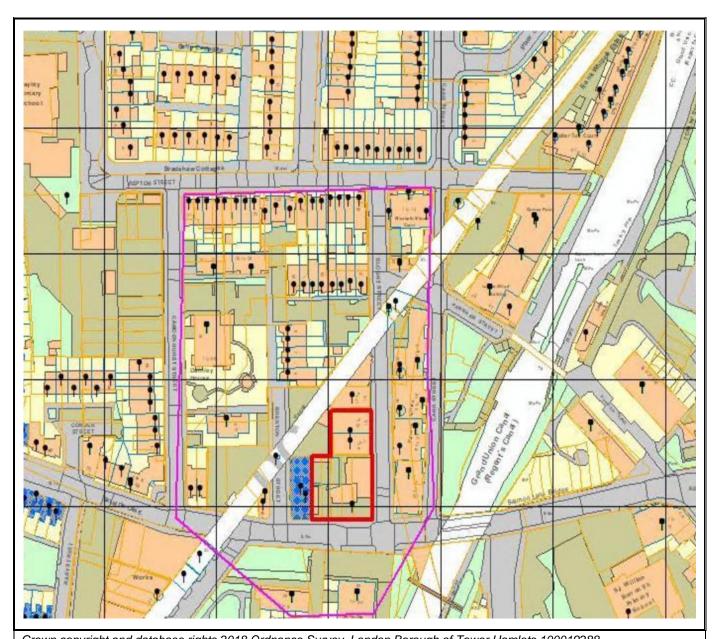
at 1-35 Rayners Terrace, however, the development would create more passive surveillance which is considered to outweigh the harm.

Highway improvement works have been outlined in consultation with LBTH Transport and Highways Officers and will be provided within the proposal and in perpetuity by way of S278 and S106 legal agreements. The proposed delivery and servicing arrangements will take place along Blount Street, as well as space for Blue Badge parking. Officers are supportive of the transport related considerations.

Biodiversity enhancements are also proposed within the landscaping proposals, which are considered sufficient to meet policy requirements and contribute towards ecology in the local area.

The scheme would be liable for both the Mayor of London's and the Borough's community infrastructure levy. In addition, the development would provide a necessary and reasonable contributions towards local employment and training.

## Site Plan





## 1. SITE AND SURROUNDINGS

- 1.1 The site is 1000sqm, bounded by Salmon Lane to the south, Blount Street to the east and a railway viaduct to the northwest. The site is currently occupied by a variety of low-density commercial uses, including a car repair workshop and MOT testing centre fronting Salmon Lane (use classes B2 / Sui generis) and 2 warehouse style buildings fronting Blount Street, used for car repairs and the storage of refrigerated goods. There is currently 399sqm of commercial floorspace at the site.
- 1.2 There is a locally listed public house, the Prince Regent, located adjacent to the site to the west fronting Salmon Lane. To the east of the site, is a low-rise commercial building which was granted permission in 2020 for an upwards extension by a single storey. Rayners Terrace forms part of that building, which contains residential flats. Immediately to the north of the site is a small low-density commercial unit, the exact details of operations there are currently unknown. There is also a residential flat on the upper floor of the Prince Regent Pub.
- 1.3 The site is not directly subject to any site designations, although the Regents Canal Conservation Area is located approximately 30 metres to the east. The York Square Conservation Area is located approximately 110 metres to the west of the application site. Other than the Prince Regent Pub, which is locally listed, there are no other nearby listed buildings.
- 1.4 The site is located in an area of sub-standard air quality. The surrounding area contains a mixture of building typologies and land uses including commercial, light industrial, parks and open spaces, however residential is the predominant use. The taller buildings in the surrounding area are generally at a height of 12 16 storeys. The lower lying buildings in the surrounding area are generally at a height of 2 4 storeys.
- 1.5 The site has good public transport links and a PTAL rating of 5. The site is within close proximity to Limehouse station to the south, which is served by National Rail and DLR. Stepney Green, Shadwell and Westferry Station are all within a 15-minute walk. Nearby bus stops are located primarily Commercial Street to the South, Burdett Road to the East and Ben Jonson Road/Stepney Green to the North. The London Cycle Network route runs along Salmon Lane directly to the south of the site. The National Cycle Network route runs along the canal and down Salmon Lane to the east, connecting the London Docks and Lea Valley.
- 1.6 There are a number of universities which are highly accessible from the site, for example, Queen Mary University is a 16-minute walk or short bus ride, the University of Cumbria in London is a 12-minute walk, or 8-minute bus ride and York St John University is a 14-minute journey on the DLR.
- 1.7 Neighbourhood town centres include Salmon Lane to the southeast, Limehouse to the southwest along Commercial Road and Ben Jonson Road to the north. Local amenities are also sited close by on Commercial Road. The site is within close proximity to local shops, facilities, and parks.

## 2. PROPOSAL

- 2.1 The proposal is for the re-development of the existing buildings into a seven-storey building comprising commercial space and student accommodation. The scheme proposes 400sqm of incubator maker space (Class E use) at ground floor and 106 student housing units across floors 1 6. Internal ancillary amenity space for all students will be provided at ground and first floor level, as well as outdoor amenity space at first, third and sixth floors.
- 2.2 The ground floor incubator maker space would comprise light industrial uses and would be accessed off Salmon Lane. This incubator maker space would provide workshop spaces, flexible workspaces, and meeting rooms for light industrial uses. The space would have its own kitchenette and cycle and refuse storage.
- 2.3 A mix of student housing rooms are proposed, including 65 studio units, 31 cluster units and 10 wheelchair accessible units. A total of 35% of the student units would be affordable, comprising 31 cluster units and 6 studio units. There will be a mix of internal and external shared amenity spaces throughout the building.
- 2.4 The proposed development would be car-free, with no parking provision other than one blue badge space on Blount Street. Cycle and refuse storage for the student accommodation and commercial unit is proposed at ground floor level, accessed off Blount Street. There will be a total of 76 long-stay cycle spaces for the student accommodation and 9 long-stay spaces for the commercial unit.



Figure 1: Visual of the proposed building viewed from Salmon Lane looking west.

#### 3. RELEVANT PLANNING HISTORY

#### **Application site**

3.1 PA/21/02237/A1 – Demolition of existing buildings and erection of a building up to part ground plus 7 storeys with commercial use (Use Class E) at ground level and residential (Use Class C3) at upper floors alongside associated access, parking, and landscaping – Withdrawn.

## Nearby/Related sites

- 3.2 PA/20/1839 16 Blount Street: Proposed second floor extension to existing offices to provide B1/B8 office use and roof terrace. **Approved 23/11/2020.**
- 3.3 PA/04/01429 Former site at Railway Arch, West of Carr Street North of Salmon Lane and East of Blount Street (Now known as Rayners Terrace): Demolition of railway viaduct and redevelopment by erection of a four-storey building comprising 35 residential units (all affordable) and 330sqm of commercial floor space (Class B1, B8). **Approved 22/03/2005.**

#### 4. PUBLICITY AND ENGAGEMENT

### **Pre-application**

4.1 The submitted Statement of Community Involvement (SCI) sets out the non-statutory consultation undertaken by the applicant, and how this influenced the application. The programme of consultation comprised of a project website and meetings with key stakeholders including elected representatives, local residents and businesses.

## Statutory application consultation

- 4.2 Upon validation of the application, the Council sent out consultation letters to 319 nearby owners and occupiers. An advert was posted in the press and a site notice was displayed outside the site.
- 4.3 In response, one letter of objection and a petition in objection with 129 signatures were received. Two letters of support have been received. The themes and issues raised in objection are summarised as follows:
  - The redevelopment will have an adverse effect on the environment.
  - The development will change the physical environment of the locality.
  - This will worsen overcrowding.
  - It will obstruct sunlight to the properties next to the site.
  - It will increase pressure on public services e.g., post office, health centre.
  - It will lead to an increase in vehicle congestion and parking problems in the locality.
  - The provision of commercial facilities will change the character of the locality.
  - The development would deprive young children of potential space for play and games.
  - The space should be developed into a community facility.
  - The development will obstruct views of the neighbourhood.
  - It will be an overdevelopment of the site and too tall compared to adjacent new builds.
  - The space should be used to provide affordable housing for families as this is needed most.
  - The development will increase the noise pollution in the area.
  - This will add to disturbance and anti-social behaviour in the area.
  - It will infringe on rights to privacy.
  - Will increase CO2 emissions locally.
  - The terraces will create rooftop partying.

- 4.4 Officers acknowledge the comments made within the contents of the objections. The material considerations of this proposal will be addressed in the main body of the report, which will in turn address the comments made in the representations. It should be noted that comments made in relation to 'obstruction to views' is not a material planning consideration.
- 4.5 Letters of support have been received by International Students House (ISH) and London Metropolitan university. ISH write in support of the high quality accommodation proposed and the living experience that would be provided for students. London Met have expressed their support for additional residential capacity for ISH as they rely on ISH to provide accommodation for their students.

#### 5. CONSULTATION RESPONSES

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

#### **External responses**

**Thames Water** 

5.2 No objections to the proposed development. Piling method condition recommended.

## MET Police - Secured by Design

- 5.3 There are opportunities to implement measures to ensure safe and secure environment for future residents.
- 5.4 No objections to the proposed development but recommend Secure by Design conditions.

#### Transport for London

- 5.5 TfL supports that proposal would be 'car free' therefore future residents should be excluded right for local parking permits, to be secured by legal agreement.
- 5.6 Cycle parking provision is satisfactory, and the on-going provision and up-keep should be secured by condition. Shower and changing facilities should be provided for the commercial unit.
- 5.7 TfL recommends that Tower Hamlets Council to secure appropriate walking/ cycling/ public realm improvements in light of findings in the Healthy Street ATZ Assessment.
- 5.8 The provision of a Framework Travel Plan is welcomed, the approval of the Final Travel Plan shall be secured by s106 agreement. It is considered that local cycle training details and offers shall also be provided as part of the Cycle Plan measures, as well as the adequate up-keep of the on-site cycle parking facility.
- 5.9 Delivery and Servicing Plan, Construction Management Plan and Construction Logistics Plan shall be secured by condition.

#### Network Rail

5.10 No objections. Informatives recommended.

## HSE Planning Gateway One

5.11 The building will be provided with two staircases which serve the full height of the building, one of which is a designated firefighter stair. Following a review of the information provided in the planning application, HSE is satisfied with the fire safety design.

## Canal and River Trust

5.12 The design of the proposal takes appropriate consideration of the adjacent public house. With the pub's origins (c1817) being associated with the early development of the canal corridor, its successful reincorporation into a coherent street-scene is of relevance to the conservation of the waterway heritage. In addition, the staggered treatment of the east-facing aspect of the proposal helps ensure that the limited views onto the proposal are not harmful to the Regent's Canal Conservation Area.

The scale of the development would bring more residents and visitors to the area and to the Regent's Canal and its towpath, to make use of its amenity value and convenient car-free walking and cycling route. The development may provide support through a contribution towards biodiversity improvements around the canal at Stonebridge Wharf or Salmon Lock, improved cycle connections and wayfinding at street level.

#### **Internal Responses**

## Environmental Health (noise and vibration)

- 5.13 The Proposed Development is subject to the agent of change principle, in accordance with London Plan Policy D13. This places the responsibility for mitigating the impact of noise and vibration on the proposed development. This means that where new developments are proposed close to existing noise-generating uses, developments should be designed to avoid significant adverse noise and vibration impacts on the new occupiers, including residents.
- 5.14 Where a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses; the onus is on the new user to ensure its building or activity is designed to protect existing users or residents from noise impacts.
- 5.15 No objection to the proposed development on grounds of noise and vibration. Conditions recommended.

#### Environmental Health (contaminated land)

5.16 No objections. Ground contamination condition recommended.

#### Environmental Health (pollution)

- 5.17 The 'Air quality assessment' submitted is satisfactory. The 'Air Quality Neutral' included in the 'Air Quality Assessment' is satisfactory. Since there is no on-site parking, and since the proposed development will use electrical HVAC systems only, the proposed development is air quality neutral both from a building and transport emissions perspective.
- 5.18 No objections to the development, conditions relating to air quality during the construction phase are recommended.

#### Biodiversity

- 5.19 The existing application site consists entirely of existing buildings and hard surfaces. The buildings have negligible potential for bat roosts. There will not, therefore, be any adverse impacts on biodiversity.
- 5.20 Policy D.ES3 requires developments to deliver net gains in biodiversity that contribute to the Local Biodiversity Action Plan (LBAP). The Preliminary Ecological Assessment recommends enhancements including biodiverse roofs, nectar-rich planting, bat, bird and insect boxes. All of these would be appropriate at this location and would contribute to LBAP objectives and targets.
- 5.21 The proposed terraces and extensive green roofs will contribute towards LBAP targets. The proposed planting on the amenity roof terraces includes a good variety of nectar-rich perennials and shrubs, which will provide nectar for bees and other pollinators. This will contribute to another LBAP target.
- 5.22 Bird, bat and insect boxes as recommended in the PEA should be incorporated. Full details of biodiversity enhancements should be secured via condition.

#### **SUDs**

5.23 The SUDs details are acceptable in principle. Further details regarding drainage and maintenance should be secured via planning condition.

#### Policy

- 5.24 Policy D.H6 states that student housing should be directed in locations which are in close proximity to higher education institutions. Close proximity is defined as being adjacent to the institution or within walkable distance of 10-15 mins. The proposed development is in close proximity to the University of Cumbria (12-minute walk). Queen Mary University is a 16-minute walk, and York St John University is a 14-minute journey on the DLR. However, the proposed development site is in PTAL zone 5, within close walking distance of Limehouse Station.
- 5.25 Paragraph 9.63 of this policy requires developments to demonstrate the proposed development would not compromise the supply of self-contained homes and would not result in a net loss of self-contained homes. In this regard, this site is currently occupied by industrial/warehouse use and is not allocated for housing in the Local Plan. It is considered therefore that the proposed development would not result in net loss of self-contained housing.
- 5.26 Policy D.EMP3 requires that developments should not result in a net loss of viable employment space outside of designated employment areas. The proposed scheme would re-provide 400 sqm (100%) of existing employment space as a 'incubator/ maker's space' (use class E g iii) and therefore satisfies the requirements of this policy.

#### Waste

- 5.27 A Reuse, Recycling and Waste strategy has been submitted.
- 5.28 Bin store access should be fitted with key access codes under guidelines Tower Hamlets do not accept fob access for collection as fobs tend to get lost.
- 5.29 Multi-storey residential developments should have a separate space for the short-term storage of bulky items of furniture or electrical items, at ground level. This has not been provided in this case.

## Transport and Highways

- 5.30 No objection in relation to the Servicing arrangements, which would be via a servicing bay on Blount Street. A final Deliveries and Servicing plan is recommended to be secured via condition. The cycle parking provision, although a slight shortfall in meeting the required number of spaces, would meet the requirements of the London Cycle Design Standards.
- 5.31 Transport and Highways related planning obligations are recommended, including a s278 agreement to make alterations to the parking spaces / double yellow lines along Blount Street, as well as building out the existing curb line to widen the pavement along Salmon Lane. A commuted sum of £10k should be secured, if in the future there is requirement for an additional disabled bay, refundable to be held for 2 years after the site has been occupied.

#### **Employment and Enterprise**

5.32 The Economic Benefits Officer provided details of the required financial and non-financial obligations relating to employment and skill training which are to be secured within a s106 agreement.

## **Energy and Environment**

5.33 The proposals are for a 2.5 tonnes/CO2 reduction in on-site emissions and would result in a carbon offsetting contribution of £21,090 to offset the remaining 7.4 tonnes CO2 and achieve net zero carbon. It is recommended that a post construction energy assessment be submitted, including the 'as built' calculations to demonstrate the anticipated savings have been delivered on-site. This calculation has been based on the new SAP10 carbon factors and using the recommended GLA carbon price of £95 per tonne for a 30 year period.

- 5.34 Whilst the percentage reduction in CO2 emissions falls short of the policy requirements, the scheme is delivering an electrical based low carbon ASHP system that will benefit from future decarbonisation of the national grid. It is recommended the Applicant should continue to explore energy efficiency measures and seek to deliver a better air permeability rating than currently proposed, to reduce energy requirements of the building and associated CO2 emissions.
- 5.35 In relation to sustainability policy D.ES7 states 'All new non-residential development over 500 square metres floorspace (gross) are expected to meet or exceed BREEAM 'excellent' rating'. The submitted Statement identifies that the scheme will achieve BREEAM excellent rating with a predicted score of 70.93%. This is in accordance with policy requirements and should be secured via condition with final certificates submitted to demonstrate delivery.
- 5.36 A condition requiring full details of the proposed PV array should attached to any consent to ensure that renewable energy generating technologies have been maximised. In addition to this, an appropriate condition should be attached to ensure the building's actual energy performance will be monitored post-construction. The applicant should commit to the 'Be Seen' policy requirements and follow the monitoring guidance produced by the GLA.

## **Design and Conservation**

- 5.37 The proposal responds to the height of the neighbouring locally listed pub by stepping down toward it and gradually transiting the height from three to seven storeys across the site. The south-eastern section of the building has been setback above the ground floor, ensuring this section of the structure aligns with the pub frontage on the first and second floors. This approach, combined with matching the three-storey height of the pub on the south-eastern section of the site, helps to reduce the impact of the taller parts of the scheme.
- 5.38 The taller sections of the building are located away from the pub at the north and west ends of the site. The top storey is recessed from the main building line and has a champagne-coloured finish to help diminish its visual presence.
- 5.39 The aesthetic of the building is a high-quality appearance. It is nicely detailed and has a solidity which grounds it and gives it presence within the street. The clever balance of the solid to glazed elements, paired with the champagne-coloured louvres, panels, and window frames, gives the top of the building a reassuring solidity without dominating the base or making the upper parts of the building appear top-heavy.
- 5.40 Minor amendments to the elevations and detailing as well as the provision of a communal kitchen suggested.

## 6. RELEVANT PLANNING POLICIES AND DOCUMENTS

- 6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.
- 6.2 In this case the Development Plan comprises:
  - The London Plan (2021)
  - Tower Hamlets Local Plan 2031 (2020)
- 6.3 The key development plan policies relevant to the proposal are:

#### Land Use - (student accommodation, employment)

London Plan – H15, E7 Local Plan – D.H6, D.EMP2, D.EMP3

# Design and heritage (layout, townscape, appearance, public realm, safety, heritage)

London Plan - D1, D3, D4, D5, D8, HC1 Local Plan - S.DH1, D.DH2, S.DH3

#### Student Accommodation (affordable student housing, fire safety, amenity)

London Plan – H1, H15, D6, D12

Local Plan - S.H1, D.H3, D.H6

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

London Plan – D3, D6 Local Plan - D.DH8

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

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

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

London Plan - G1, G4, G5, G6 Local Plan - S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.MW3

- 6.4 Other policy and guidance documents relevant to the proposal are:
  - National Planning Policy Framework (2021)
  - National Planning Practice Guidance (as updated)
  - LBTH Central Area Good Growth SPD (2021)
  - LBTH Reuse, Recycle and Waste SPD (2021)
  - LBTH Planning Obligations SPD (2021)
  - LBTH Community Infrastructure Levy (CIL) Charging Schedule (2023)
  - London Plan Housing SPG (updated 2017)
  - London Plan Control of dust and emissions during construction and demolition SPG (2014)
  - London Cycling Design Standards (2016)
  - Building Research Establishment's Site Layout for Daylight and Sunlight: A Guide to Good Practice (2022)

#### 7. PLANNING ASSESSMENT

- 7.1 The key issues raised by the proposed development are:
  - i. Land Use
  - ii. Student Housing
  - iii. Design & Heritage
  - iv. Neighbour Amenity
  - v. Transport
  - vi. Environment
  - vii. Infrastructure
  - viii. Local Finance Considerations
  - ix. Equalities and Human Rights

## **Land Use**

7.2 The site currently comprises low-density light industrial and sui generis uses in what is a predominately residential area. Therefore, given that the site is not subject to any site-specific land use allocations, the principle of a mixed-use scheme is acceptable in principle subject to the employment floorspace requirements discussed below.

### **Employment Floorspace**

- 7.3 Policy D.EMP3 of the Local Plan (2020) local plan states that development should not result in the net loss of viable employment floor space in areas outside of designated employment areas unless a number of tests are met, including:
  - Evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures; or
  - Robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use.
- 7.4 Part 3 of Policy D.EMP2 outlines that new or intensified employment space will be supported in locations outside of Tower Hamlets Activity Areas, Town Centres and along major transport routes if it can be demonstrated that there is a reasonable prospect or occupancy, the employment use would contribute towards integrated placemaking or the area forms part of a cluster of similar employment uses.
- 7.5 Policy E7 of the London Plan (2021) states that mixed used intensification proposals on industrial sites should only be supported where industrial floorspace is provided.
- 7.6 The site is not subject to any site-specific land use allocations on the Borough's Adopted Policy map but is classified as an 'other employment location' under policy S.EMP1. Information submitted with the application evidence that the site is currently occupied by low density commercial uses comprising a car repair workshop and MOT testing centre fronting Salmon Lane and two warehouse style buildings fronting Blount Street, used for storage and refrigeration goods. The existing buildings are run down with parts of the car repair workshop and MOT testing centre built with corrugated metal. The two buildings used for storage of refrigerated goods comprise large floorplates accessed through garage doors, with rooflights providing the only source of natural light. It is considered that the current commercial spaces are of poor quality.
- 7.7 The proposal would deliver 400sqm of employment space in the form of 'incubator maker space,' which falls under Class E use. Such commercial units tend to be used by start-up companies, providing space for workshops and research activities. The use class would be akin to the former Class B1c (now E g iii) which would comprise of light industrial and creative industries. There would be no loss of Industrial Capacity on the site and the proposals would provide new, high quality light industrial floorspace. It is considered that the proposed use would interact well with the student use proposed above and would create high quality workspace which would be an improvement on the current space.
- 7.8 The proposals would comprise a minor uplift of 1sqm in commercial floorspace and the activities associated with the light industrial use are not considered to represent an 'intensification' of employment. As such, it is not considered that Policy D.EMP2 would need to be applied in this instance. Further, this policy relates to new employment use floorspace, which is not the case in this development, given the existing employment use at the site.
- 7.9 Officers are satisfied that the layout of the proposed 'incubator maker space' would provide sufficient space to meet the needs of employees using the space. The space includes refuse and cycle storage, WC facilities and kitchen space, therefore providing users of the unit with functional space.

## Student Accommodation

- 7.10 Local Plan Policy D.H6 states that proposals involving new purpose-built student accommodation should be directed in locations which are in close proximity to the borough's higher education institutions or in highly accessible locations. Such proposals should not compromise the supply of land for self-contained homes and should have an undertaking in place to provide housing for students at one or more specific educational institutions, or otherwise provide and element of student accommodation. Furthermore, such proposals should respect existing neighbouring amenity and the development would be expected to provide a minimum of 5% wheelchair accessible units.
- 7.11 The London Plan policy H15 echoes the requirements of the Local Plan and further emphasises that a nominations agreement should be secured for occupation by students of one or more higher education provider.
- 7.12 The site offers a PTAL rating of 5, therefore making the site highly accessible to nearby higher education facilities. For example, Queen Mary University is a 16-minute walk or short bus ride, the University of Cumbria in London is a 12-minute walk, or 8-minute bus and York St John University is a 14-minute journey on the DLR.
- 7.13 The site is not within an allocation for self-contained housing and there is no extant consent for housing, therefore student housing on the site does not compromise the supply of land for self-contained homes. It is considered that the introduction of student housing on this site would contribute to creating a mixed and inclusive neighbourhood. Therefore, student housing is considered to be acceptable in principle at this site.
- 7.14 The applicant has been in discussions with 'International Students House' (ISH) to partner with them on the site. ISH is one of London's only student housing charities dedicated to international students and UK students. ISH is partnered with 32 London universities, each of which pay a membership fee to support their mission to house students. Their rents are maintained at affordable levels as part of the charity's mission, with ISH also offering bursaries and scholarships to support living arrangements.

#### **Student Housing**

#### Affordable Student Accommodation/ Nominations Agreement

- 7.15 London Plan (2021) Policy H15 requires the majority of the student rooms, including all affordable rooms, to be covered by a Nominations Agreement with one or more Higher Education Providers (HEP). To follow the 'fast track route', at least 35% of the accommodation must be secured as affordable student accommodation, or 50% where the development is on public land or industrial land appropriate for residential uses, where there is a loss of industrial capacity. Local Plan Policy D.H6 supports this approach and, as discussed above, the applicant has committed to entering into a nominations agreement via a s106 obligation with one or more HEP.
- 7.16 The proposal would re-provide the existing Industrial Capacity on the site. As such, the development proposes 35% affordable student accommodation which is welcomed and in line with the London Plan (2021) policy H15.
- 7.17 Specifically, the development would provide 37 affordable student rooms, including 31 cluster units and 6 studio units. This equates to 35% of the student accommodation as affordable, to be secured at rates equal to or below 55% of the maximum Government maintenance loan for living costs in accordance with the London Plan Annual Monitoring Report (AMR). The proposed offer would therefore be eligible for the Fast-Track Route, subject to the units being secured at the levels set out in the AMR in the S106 agreement, inclusive of all services and utilities as offered to a market rented unit.
- 7.18 The affordable student accommodation would have no discernible differences in quality, with all rooms in the development being finished to the same standard. The affordable and wheelchair accessible element shall be secured via a S106 obligation and condition.

## Quality of Accommodation

- 7.19 London Plan policy H15 requires purpose-built student accommodation to provide adequate functional living space for students in terms of the design and layout of bedrooms. Supporting paragraph 4.15.6 of the London Plan states that student accommodation should achieve a high residential quality in line with Policy D3, which requires, among other things, a safe, secure and inclusive environment, appropriate outlook, privacy and amenity, conveniently located open spaces, and comfortable and inviting indoor and outdoor environments.
- 7.20 While there are no defined space standards (including amenity space) for student accommodation, it is the view of officers that the principles of good residential design should be applied to a proposal for student housing given that student accommodation is a primary place of residence. It is critical that design of purpose-built accommodation is of a high quality, with adequate amenity to contribute to healthy and sustainable lifestyles.
- 7.21 The student accommodation units are intended for single use only, with no provision for larger units to support families.
- 7.22 There will be two-stair cores through the building, with a maximum of 24 units and a minimum of 10 units per floor.
- 7.23 The submitted accommodation schedule sets out the range of unit types proposed. There would be a total of 31 'cluster' units with bedrooms which range from 12sqm to 17sqm, all providing an efficient layout with space for a bed, ensuite, desk, chair and storage. The shared cluster amenity spaces would range from 22sqm to 56sqm and provide a communal kitchen and living space. Depending on the floor of the building, the cluster spaces would provide shared facilities for between 2 to 8 students.
- 7.24 There will be a total of 65 studio units ranging from 15sqm to 31sqm in size, providing sufficient private space for future residents. The bedrooms have been designed with an efficient layout to provide space for a en-suite, bed, desk and chair, storage space and a kitchenette.
- 7.25 There will be communal amenity spaces located within the building which can be accessed by all occupiers of the building. On the ground floor, there will be a lounge space, laundry facilities as well as a room for flexible study space. On the first floor, there will be communal social space providing seating and sofa space. These spaces would provide a good environment for students to interact and study outside of their bedrooms.
- 7.26 High quality external amenity space would be provided in the form of 3 outdoor terraces, amounting to a total of 322sqm. These terraces would be located on the first floor, with the internal communal social space looking onto this space, the third floor and the sixth floor. All outdoor terraces would be landscaped, incorporating seating areas, planting beds, trees, shrubs and grasslands. These spaces will provide high-quality outdoor amenity space for students.



Figure 2: Illustrative landscape plan

- 7.27 A large proportion of student rooms would be single aspect, which would not be considered acceptable within a traditional housing scheme. However, the arrangement proposed does not raise any planning concerns, given the short term nature of student accommodation tenancies and provision of high quality internal and external amenity space within the scheme. Further, all windows proposed to the student rooms would be large floor to ceiling windows providing good levels of light and outlook. Any windows which look onto shared outdoor amenity space will have sufficient defensible space to ensure the privacy of the student rooms is not compromised.
- 7.28 Paragraph d of policy D.H6 states that 5% of student rooms must be wheelchair accessible. The proposal will deliver 10 accessible units (2 per floor on levels 1, and 3, and 3 per floor on levels 4 and 5), fitted-out to the same standard as the rest of the accommodation. Therefore, 9% of the units will be accessible, thus exceeding the policy requirement.
- 7.29 The scheme will provide 108sqm of internal amenity space, which equates to 1sqm of internal amenity space for each student, as well as laundry and post room facilities for each student. The shared internal amenity space for all students comprises a ground floor study space and lounge, and a first floor communal lounge. Whilst the amount of internal amenity space per student is not overly generous, it should be noted that there is 322sqm of external communal space for students to use. In addition, the students in the cluster units would have access to their own shared communal facilities and lounges. The internal amenity spaces would provide good quality spaces for all students to socialise outside of their rooms and clusters, should they wish to.
- 7.30 The space on the roof of the block is designated for PVs, ventilation and lift uses. It is considered that the scheme provides an acceptable level of amenity space for the students.

#### Daylight and Sunlight for Proposed New Development

7.31 Policy D.DH8 of the Local Plan seeks to ensure that amongst other things, adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development are achieved. The relevant guidance for assessing daylight and sunlight levels is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2022).

- 7.32 The applicant has submitted a daylight / sunlight report, produced by eb7, to assess the daylight and sunlight within the development based on BRE guidance. All the assessments have been reviewed independently by BRE.
- 7.33 The daylight and sunlight amenity provided within the proposed student accommodation has been assessed using the daylight illuminance assessments following the methodology of the 2022 BRE guidance.
- 7.34 In respect of daylight, the BRE guidance suggests that, for student accommodation, the highest targets should apply. For example, in a bed sitting room in student accommodation, the value for living room should be used if students would often spend more time in their rooms during the day. When applying the BRE targets for daylight illuminance, the results indicate that out of 112 habitable rooms, all would meet or exceed the target.
- 7.35 In respect of sunlight, the target is for the units to achieve at least 1.5 hours of direct sunlight on 21<sup>st</sup> March ideally within the main living space. The results indicate that 91 (81%) of the 112 habitable rooms analysed in the proposed development, would be able to achieve at least the minimum recommended 1.5 hours of sunlight on 21 March.
- 7.36 Whilst there are 4 bedrooms which do not achieve the 1.5 hours of sunlight required, these all have access to communal areas which exceed the minimum target for sunlight.
- 7.37 17 studios will fall below the target for sunlight, of which 9 of these are located on the northerly side of the building and given the orientation of the site, it is not possible for these units to achieve the required targets. The remaining units which do not meet the target are located to the internal 'corner' of the proposal but maintain good outlook facing west onto the communal gardens.
- 7.38 In conclusion, the proposed daylight and sunlight results to the new units are considered to be acceptable. All units would meet the daylight targets, and whilst there are shortfalls for some units in terms of the sunlight targets, the internal communal areas would receive sufficient sunlight.

#### **Outdoor Communal Amenity Space**

- 7.39 As this is a student accommodation scheme rather than conventional residential, there is no policy requirement for play space, open space or communal amenity space to be provided.
- 7.40 For outdoor amenity space, BRE guidance uses a '2 hour sun contour' analysis. This involves dividing the areas that can receive at least 2 hours of sunlight on ground from those that receive less than 2 hours. As a whole, the results suggest that 58% of the outdoor amenity spaces combined experience at least 2 hours of sun on 21 March, therefore exceeding the BRE target of 50%.
- 7.41 The first floor terrace would fall below the target for sunlight, achieving 2 hours of sunlight to 40% of the area. The landscaping plan has however been designed to respond to the pattern of sunlight by delivering both sunlit and shaded seating areas to provide occupants with varied mix of outdoor spaces.
- 7.42 The results suggest that the proposed terraces on the third and sixth floors would meet the recommendation of 2 hours of sunlight on 21 March for at least half of the area.
- 7.43 Overall, it is considered that the outdoor amenity spaces as a whole would receive adequate levels of sunlight, providing students with a range of spaces to socialise.

#### **Design & Heritage**

- 7.44 Development Plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting or heritage assets.
- 7.45 London Plan (2021) policy D3 promotes the design-led to optimise site capacity. 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.

7.46 Policy S.DH3 (Heritage and the Historic Environment) of the Local Plan states that proposals must preserve or where appropriate, enhance the Boroughs designated and non-designated heritage assets in a manner appropriate to their significance. The policy goes on to state that proposals that would affect the setting of a heritage asset would only be permitted where, amongst other things, they safeguard the significance of the heritage asset, including its setting, character, fabric or identity and they are appropriate in terms of design, height, scale, form, detailing and materials in their local context.

#### **Layouts**

#### Commercial unit

- 7.47 Local Plan policy D.EMP2 requires new employment space to be completed to a standard which meets the needs of potential users. The supporting text states that development should provide sufficient cycle spaces, appropriate levels of natural light and a range of shared services and facilities appropriate for the size and scale of the unit, such as communal breakout spaces, kitchen areas and showers. Industrial units will be expected to provide double-height units, with appropriate access and good standards of internal sound insulation to minimise conflict with surrounding uses.
- 7.48 The proposed commercial unit is well laid out, providing flexible workspace, meeting rooms and workshops for future users of the unit. The large windows on the Salmon Lane elevation will align with the fenestration height of the pub, therefore relating to the surrounding context and also providing generous natural lighting. The unit has been designed with rooflights towards the rear to ensure the back of the building receives some level of natural light. The unit is provided with kitchen space, cycle and refuse storage as well as changing/shower facilities. It is considered that the proposed commercial unit is provided with all essential functions and the space will function well.

#### Student Accommodation

- 7.49 London Plan policy H15 states that PBSA must provide functional living space and layout. Policy D3 states that developments must achieve safe, secure and inclusive environments, with appropriate and conveniently located spaces for social interaction and with appropriate mitigation for noise and air quality impacts. It should be noted that there are currently no adopted policy or government design standards for student accommodation.
- 7.50 The ground floor layout of the student accommodation has been designed to include all essential functions associated with the use. There will be adequate space for a reception/concierge and associated facilities as well as sufficient cycle storage space. There will be ancillary student spaces at the ground floor such as lounge space, flexible study space and a laundry room. These rooms would front onto Blount Street and provide invaluable informal surveillance. The location and layout of these ancillary spaces will provide safe spaces outside of their rooms for all students located within the building to socialise and study, offering the opportunity for students to feel like part of a community.
- 7.51 A further 56sqm of internal communal social space is proposed on the first floor, providing space for sofas and dining tables. This space will be accessible to all students within the building, thus providing further space for socialising outside of individual rooms. This social space has been designed with large windows which look out onto the external shared amenity space.
- 7.52 Cluster amenity spaces are proposed on floors 1 to 6, providing students of the cluster units with space to socialise and cook. The cluster amenity spaces vary in size depending on the number of students in the cluster, but each space provides adequate layout and space.
- 7.53 As discussed earlier in the report, the development will provide 108sqm of internal amenity space for all students to use, equating to 1sqm per student. The shared internal communal spaces will be on the ground and first floors, which can be easily accessed by all students.

Whilst it is acknowledged that design officers suggested the inclusion of a shared kitchen facility within one of the communal spaces, the applicant has not provided this. Although this would provide opportunity for occupants of the studios additional cooking facilities, the studio units provide sufficient layouts which include kitchenettes. It should be noted that there are no defined standards and requirements for student housing.

7.54 On balance, it is considered that the proposed internal layout of the student accommodation is acceptable and will deliver adequate functional living space and layout in line with policies D3 and H15 of the London Plan (2021).

## Townscape, Massing and Heights

- 7.55 The proposed building will be a ground plus six-storey building measuring a maximum of approximately 24 metres in height. The seventh storey will be recessed and set back from the front building line by approximately 1.3 metres in the Blount Street elevation and 1.8 metres in the Salmon Lane elevation, therefore largely giving the building the appearance of 6-storeys when viewed from street level.
- 7.56 The surrounding building heights are varied, ranging from tall buildings to low lying dwellinghouses. To the north of the site, single storey industrial buildings would remain following the development. To the east is a four-storey residential block fronting Carr Street. To the south is a 17-storey residential tower block and adjoining the site to the west is a three-storey public house. As such, it is evident that the site sits within a varied townscape.
- 7.57 The design responds well to the height of the adjoining locally listed public house by stepping down toward it and gradually transitioning the height from three to seven storeys across the site. The south-eastern section of the building has been setback above the ground floor, ensuring this section of the structure aligns with the pub frontage on the first and second floors. This design approach reduces the mass and height of the development to ensure the building responds well to the adjoining building.
- 7.58 The tallest sections of the building are located away from the public house at the north and east ends of the site. The top (seventh storey) is located furthest away from the site in the north-eastern corner. The top storey is recessed from the main building and has a champagne-colour finish which helps to diminish its visual dominance.
- 7.59 The design of the building has successfully reduced the mass and bulk of the development throughout. The stepped design approach, which allows terraces at first, third and sixth floor to be incorporated, as well as green roofs throughout the building, and a chamfered corner on Salmon Lane, ensures that the mass and bulk is broken up and the building does not appear heavy within the street scene. Officers are satisfied that the proposed building would sit well within the context of the neighbouring buildings.
- 7.60 The proposed building will sit above the building heights of both the locally listed pub and the Rayners Terrace flats, therefore appearing the tallest in this part of Salmon Lane street scene. The proposed height is considered to be acceptable.

#### Appearance & Materials

7.61 The appearance of the building is of a high quality, with carefully chosen detailing and materials which complement each other. In terms of the proposed materials, the building will be predominately constructed in a red coloured brick, with a lighter tone of champagne coloured metal cladding.



Figure 3: Visualisation of the building from Salmon Lane looking east.

- 7.62 There will be exposed blank walls siding the Prince Regent Public House, as well as the furthest most northern elevation. To ensure these walls are not left blank, visual interest has been added by continuing the brick banding onto these walls, which is detail that is evident on other elevations.
- 7.63 The external aesthetic will give the building a quality and cohesive appearance. The proposed detailing, brickwork and glazing together with the colour tones ensures the building is finished to a good standard. Of particular note are the proposed active frontages onto both Salmon Lane and Blount Street. As existing, the buildings on the site provide no activation and present as an untidy and rather austere built form. As proposed, new 'shopfronts' would provide passive surveillance and activation onto the street, enhancing the character of the street scene and the pedestrian environment.
- 7.64 Overall, the proposed appearance and materials will ensure the delivery of a high quality design which enhances the local character. The quality of the materiality, detailing and finish will play an essential role in achieving the desired appearance, therefore, material samples and further details will be secured by conditions.

#### Landscaping & Public Realm

- 7.65 The proposal includes 3no landscaped terraces which would be accessible to all students within the development. The indicative layouts of these spaces have been shown on the plans and these suggest that tranquil amenity spaces are proposed, with a good balance of hard and soft landscaping.
- 7.66 The landscaped terraces and sedum roofs throughout the development add a level of softening to the building, in particular the trees and shrubs, of which some will be visible from the street scene. To ensure the planting proposed is deliverable, full details of the planting and accommodation for long term growth will be secured via condition.



Figure 4: Visualisation of one of the outdoor terrace spaces for students.

7.67 Overall, the proposed landscaping strategy creates a green and verdant appearance to the building which will provide a number of high quality spaces for students to socialise outside. Whilst the applicant has indicated the nature of these spaces in the submission documents, details regarding the soft and hard landscaping, maintenance and furniture will be secured via condition.

## Safety & Security

- 7.68 The Met Police were consulted as part of the application process. The Met police believe that there are opportunities within the proposals to implement measures to ensure a safe and secure environment for future residents.
- 7.69 The Met police have requested that a strategy detailing the measures to be incorporated into the development in order to meet Secured by Design accreditation, is submitted prior to the commencement of above ground works, which the applicants have agreed to.

#### **Built Heritage**

- 7.70 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.
- 7.71 The Prince Regent Pub, located immediately west of the application site, is the closest heritage asset to the proposal. The pub is locally listed, and the proposal has sought to respond to the building height of the pub by stepping down on the western side of the building. Further, the ground floor fenestration aligns with that of the pubs ground floor fenestration height. Once part of a coherent street frontage, the pub has spent much of the last 50 years as a stand-alone building on a prominent corner. The introduction of development onto the site would bring the pub back into the street scene and create a continuous street frontage.
- 7.72 The proposed building has considered appropriate materiality, tonality, massing and articulation to ensure that there is a respectful transition between the locally listed pub and the

new development. It is considered that the building responds well to the heritage asset and does not cause detrimental harm to the significance of the locally listed pub. The Prince Regent will remain dominant on its corner in its own right and the proposal brings opportunity to reengage the pub with its surroundings.

- 7.73 The Regents Canal, which forms part of the Regents Canal Conservation Area sits approximately 50 metres to the East of the application site. The conservation area designation protects the special character of the banks of the Regent's Canal and specific canal features such as the locks, bridges, wharves, moorings and towpath. The site is within the setting of the conservation area but does not contribute to its value. Further, there is limited visibility between the site and nearby canal. As such, given the distance in land from the canal, it is not considered that the proposed development would harm the setting and appearance of the Regents Canal Conservation Area.
- 7.74 The York Square Conservation Area is located approximately 110 metres to the west of the application site, sitting on the western side of the railway arches. Given the distance from the application site, and the limited views of this Conservation Area due to the presence of the railway bridge and arches, it is not considered that the proposed development would cause harm to the nearby York Square Conservation Area.
- 7.75 Given the distance between the conservation area heritage assets and the application site, as well as the densely built environment, it is considered that there would be no impact due to the lack of intervisibility and the potential to appreciate these together. As such, the proposal is considered acceptable.

## **Neighbouring residential amenity**

7.76 Policy D.DH8 of the Local Plan requires new developments to protect and where possible enhance or increase the extent of the amenity of new and existing buildings and their occupants, as well as the amenity of the surrounding public realm. To this end development should maintain good levels of privacy and outlook, avoid unreasonable levels of overlooking, not result in any material deterioration of sunlight and daylight conditions of surrounding development. Development should also ensure that there are no unacceptable levels of overshadowing to surrounding open space, private outdoor space and not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development.

#### Daylight & Sunlight

- 7.77 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2022).
  - For calculating daylight to neighbouring properties affected by the proposed development, the BRE contains two tests which measure diffuse daylight (light received from the sun which has been diffused through the sky). These tests measure whether buildings maintain most of the daylight they currently received. Test 1 is the vertical sky component (VSC) which is the percentage of the sky visible from the centre of a window. Test 2 is the No Sky Line (NSL) assessment which measures the distribution of daylight within a room where internal room layouts are known or can be reasonably assumed.
- 7.78 For the above methods, the BRE guidance suggests that the existing daylight may be noticeably affected by new development if windows achieve a VSC of below 27% and are reduced to less than 0.8 times their former value, or levels of NSL within rooms are reduced to less than 0.8 times their former values.
- 7.79 For sunlight, the Annual Probable Sunlight Hours (APSH) test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. In assessing sunlight effects to existing properties surrounding a new development, only those windows orientated within 90 degrees of due south, and which overlook the site, require assessment.

- 7.80 The BRE Guidelines suggest that the main living rooms within new buildings should achieve at least 25% of annual sunlight, with 5% during the winter period. For neighbouring buildings, the guide suggests that occupiers will notice the loss of sunlight if the APSH to main living rooms is both less than 25% annually (with 5% during the winter) and that the amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.8 times its former value.
- 7.81 The below table demonstrates 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).

Reduction to daylight (VSC & NSL) and Sunlight (APSH)	Effect classification	
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 1: Daylight and Sunlight effect classification

7.82 The image below shows the location of the neighbouring properties included in the applicant's daylight and sunlight assessment. The application site boundary is shown in red.



- 1. 1-35 Rayners Terrace
- 2. Prince Regent Public House
- 3. 79 Salmon Lane
- 4. Anglia House
- **5**. Cambria House
- 6. 5 Brenton Street
- 7. 21-33 Blount Street

Figure 5: Location of assessed neighbouring properties.

7.83 The table below provides a summary of each of the neighbouring groups of properties tested and the effects on daylight and sunlight to neighbouring properties from the proposed development.

Properties	Total no. of rooms tested	Significance of daylight effects overall	Significance of sunlight effects overall
1 – 35 Rayners Terrace	33	Major adverse	Minor adverse
Prince Regent Public House	5	Minor Adverse	Negligible
79 Salmon Lane	14	Negligible	Negligible
Anglia House	67	Negligible	Negligible
Cambria House	33	Minor Adverse	Negligible
5 Brenton Street	11	Negligible	Negligible
21 – 33 Blount Street (odd numbers only)	32	Negligible	Negligible

Table 2: Impact on neighbouring properties from the proposed development

7.84 As outlined in the table above, the vast majority of neighbouring properties tested in terms of daylight and sunlight impacts would receive negligible impacts from the development. However, 1 – 35 Rayners Terrace, which is located to the east of the application site, would receive major daylight impacts. The impacts to this property will be discussed in detail below.

## 1 – 35 Rayners Terrace

- 7.85 1 35 Rayners Terrace is a four-storey apartment building which fronts onto Carr Street to the east, but there are a small number of habitable room windows fronting onto Blount Street, at its southern end. These windows face the application site. The windows facing the site serve bedrooms, with the exception of a column of living room windows on the corner of Blount Street and Salmon Lane. These living rooms also have windows (and balconies) that face south, towards Salmon Lane.
- 7.86 The results of the daylight assessments show that these windows would see reductions in daylight which would fall below the BRE VSC guidelines, with the primary impacts being to the ground floor and first floor bedroom windows and dual aspect living spaces located on the corner of Blount Street and Salmon Lane. At second floor and above, the windows which are not constrained beneath balconies retain VSC levels of c.13% and are consistent with levels considered broadly acceptable of inner urban development.
- 7.87 Overall, the proposal does result in an effect to the windows of the Blount Street elevation of the 1-35 Rayners Terrace units due to the inevitable change in scale from development. Notwithstanding this, the number of units affected is limited, with the predominate effect being to bedrooms of the lower floors, which are less sensitive than main living room windows. As the primary use of bedrooms is to sleep, the reduction in daylight is considered to be acceptable.

7.88 In terms of sunlight, the results indicate that there will be minor shifts in retained ASPH affecting two living spaces, one at ground and one at first floor level. Both of these rooms will continue to exceed the target for window sunlight but will experience marginal reductions in overall sunlight to 20% and 24% respectively. These are considered to be modest deviations from the 25% APSH target and, given that the more constrained levels of sunlight received during the winter months, will remain unchanged, these deviations are unlikely to have a substantive impact on the everyday use of these living spaces.

#### Privacy, Outlook and Enclosure

- 7.89 Policy D.DH8 of the Local Plan sets out that development must maintain good levels of privacy and avoiding an unreasonable level of overlooking. This policy sets a guide of an approximate distance of 18 metres between directly facing habitable room windows as being appropriate to maintain privacy and overlooking levels to an acceptable degree. However, this figure will be applied as a guideline depending upon the design and layout of the development.
- 7.90 Given the design and angle of the chamfered corner, it is not considered that the living spaces located in 1 35 Rayners Terrace on the corner fronting Blount Street and Salmon Lane will be harmfully overlooked. Occupants of the chamfered corner student units will only have oblique views of the Rayners Terrace living spaces; therefore, it is not considered that there would be a detrimental loss of privacy and overlooking into these rooms.
- 7.91 At the developments closest point, there would be a distance of approximately 11.3 metres between the bedroom windows facing the site at 1 35 Rayners Terrace and the proposed new building. Whilst this is not an ideal arrangement and there will be some loss of outlook from these west facing windows at Rayners Court, the relationship would not be uncommon to an urban area. The affected windows at Rayners Court primarily serve bedrooms and the respective flats are dual aspect, with either additional southern or easterly outlooks, which would remain unaffected with the proposal in place.
- 7.92 On balance, the impacts on privacy, outlook and enclosure to the surrounding occupiers as a result of the development are considered to be acceptable.

## Overshadowing impact

- 7.93 In respect of overshadowing to neighbouring gardens and amenity areas, the guidelines require that at least 50% of amenity areas should receive at least 2 hours of sunlight on 21 March to appear adequately sunlit throughout the year. If, as a result of new development, an existing garden or amenity area does not meet the above, and the area that can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.
- 7.94 An overshadowing assessment has been carried out on the amenity area and gardens at 1 9 Brenton Street to the north of the site. The assessment concludes that there will be no material impact to the rear gardens at 1 3 and 5 Brenton Street, with these areas continuing to enjoy 2 + hours of sunlight on 21 March.
- 7.95 The results show that currently the garden of no.6 Brenton Street receives at least two hours of sun on 21 March. As a result of the proposal, 20% of the space will be left with at least 2 hours of sun on 21 March. This reduction is considered to be moderate, and it should be noted that the existing railway viaduct exacerbates the percentage reductions. There will be a minor shift in pattern to shading overall and will not have a significant impact on the use of the garden space.

## Noise & Vibration

7.96 The Council's Environmental Health officers have reviewed the application. Subject to details being submitted via condition regarding the submission of a Noise Verification Report for the student units and restrictions on demolition and construction activities, there are no objections to the proposed development.

- 7.97 It is acknowledged that the proposed terraces at first, third and sixth floor may give rise to additional noise and activity which could be noticeable to neighbouring properties. To ensure this kept to a minimum and the amenities of neighbouring properties is protected, a condition restricting the terrace use times from 8am to 10pm (see condition 5) will be attached to the permission.
- 7.98 Subject to the conditions recommended, it is not considered that the development will generate unacceptable noise impacts.

## Construction Impacts

- 7.99 Demolition and construction activities are likely to cause additional noise and disturbance to the surrounding area and to neighbouring occupiers, including additional traffic generation and dust. However, this noise and disturbance would be a short term impact. Details for minimising these impacts would be provided via condition for the submission of Construction Environmental Management and Logistics and Plan.
- 7.100 In addition, in accordance with the Planning Obligations SPD, conditions would be secured towards development co-ordination and integration.

#### **Transport**

- 7.101 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.
- 7.102 Local Plan policy S.TR1 states that developments should prioritise pedestrians and cyclists; be integrated effectively alongside public transport, walking and cycle routes; be focused in areas with high levels of public transport connectivity; and not adversely affect the capacity, quality, accessibility and safety of the transport network in the borough.
- 7.103 The site is located approximately 320m from Limehouse DLR station. The site has good accessibility to local convenience stores, GPs and local employment. The site has a PTAL rating of 5 which is very good with respect to public transport.

#### Vehicular, pedestrian and cycle access

- 7.104 The commercial space will have two entrances, from Salmon Lane and from the chamfered corner fronting Salmon Land and Blount Street. The student accommodation would have three entrances on Blount Street.
- 7.105 There would be no vehicle access into the site, with all deliveries, servicing and drop off taking place via a dedicated loading bay on Blount Street.
- 7.106 Cycle parking for students will be accessed off Blount Street, through a large entrance lobby then through 2 x doors to the store, of which one of these doors will be permanently open and will only shut upon fire alarm activation. The doors will be button operated to ensure ease for cycle users. It is considered that the access route to the cycle store for students is acceptable and easily accessible.
- 7.107 The cycle parking for users of the commercial space will be accessed from Blount Street. There will be one set of doors which open inwards onto the store. It is considered that the storage is easily accessible for users of the commercial unit.
- 7.108 In summary, the proposed access arrangements are considered adequate and would provide an appropriate movement strategy for the proposed development.

#### Deliveries & Servicing

7.109 Deliveries and servicing associated with the student accommodation are expected to mostly be small to medium sized vans relating to daily deliveries, with a small number of larger vehicles collecting waste once a week.

- 7.110 For the commercial use, it is not expected that the use would generate any additional servicing/delivery trips that will materially differ from the existing use. Based on similar developments in the borough, the commercial space is not expected to generate more than 3 deliveries per day.
- 7.111 The proposed deliveries and servicing arrangements would occur along Blount Street, from a new on-street loading bay. The proposed servicing bay will be located on the western side of Blount Street, measuring approximately 10m in length. The bay would provide space for deliveries and refuse collection adjacent to the development. A dropped curb will be created to ensure that bins can be manoeuvred easily from the bin store to the collection point.
- 7.112 Whilst it is recommended in policy in the Local Plan to have servicing take place on site, the site is heavily constrained in respect of the requirement to re-provide the existing use and provide the necessary requirements of the student accommodation. It is considered that the benefits of the scheme, notably the provision of high quality workspace which would be an improvement on the existing arrangements, outweigh the use of Blount Street for servicing.
- 7.113 LBTH Highways Officers reviewed the Deliveries and Servicing Plan and arrangements provided. Officers were content that the details provided at this stage demonstrated that such movements could be sufficiently accommodated along Blount Street.
- 7.114 Students drop off and pick up would likely occur twice a year. These will take place in the deliveries and servicing bay. Full details of how this will be managed will be secured within the full Deliveries and Servicing Plan which will be secured via condition, prior to the occupation of the development. Measures such as a booking system for student drop off and pick up to ensure the bay and road is not overcrowded will be implemented.

## Car Parking

- 7.115 In line with policy, the development will be car free, with one blue badge holder parking space to be provided on Blount Street. An additional space would be provided on-street, should the demand require, which would be funded by a s106 contribution.
- 7.116 Policy requires accessible parking to be provided within the site boundary. In this instance, it has not been possible to provide blue badge parking within the site boundary due to the facilities and requirements of the student use and commercial space. The site constraints have meant that the blue badge bay would be provided on street. An on-street accessible bay would mean that the bay is not dedicated solely to the users of the development, as it would be open to all blue badge holders. Should demand demonstrate that additional blue badge bays are required, these will be secured via s106 agreement.
- 7.117 The proposed blue badge space is considered to be acceptablefi, and officers welcome the provision of the space immediately adjacent to the building.

## Cycle Parking and Facilities

- 7.118 London Plan (2021) policy T5 provides the minimum cycle parking standards for different land uses.
- 7.119 The London Cycle Design Standards (2016), produced by TfL, sets out that cycle parking for developments should be secure, well located, covered, fully accessible and managed. There should be options for long stay and short stay spaces.
- 7.120 The student accommodation would require a minimum of 80 long stay cycle stands, based on the London Plan (2021) standards. The proposal includes 76 long stay spaces, comprising 23 Sheffield style stands and the remainder comprising two-tier stands. Sheffield stands are the preferred style of cycle storage as they are considered to be most accessible for users. Whilst there is a slight shortfall in the number of spaces, given the generous amount of Sheffield style spaces, officers consider the slight shortfall to be acceptable on balance. There will be 4 short stay Sheffield stands on the chamfered corner.

- 7.121 The students cycle store will be accessed from Blount Street, through 3 sets of doors, 1 of which will remain permanently open unless a fire alarm is activated. The doors will be operated via a push button system, therefore providing easy access for cycle users.
- 7.122 For the commercial use, the London Plan would require 2 long stay spaces for the proposed use class (light industrial) and amount of floor space proposed. The size of the unit would not meet the minimum space requirement to provide short stay spaces. The proposed cycle storage for the commercial unit comprises space for up to 9 cycles, using a mix of Sheffield stands and two-tier racks. There will also be 4 short-stay Sheffield style spaces on the chamfered corner.
- 7.123 The commercial cycle storage will be accessed from inward opening doors off Blount Street, located next to the refuse store. The cycle storage proposed is generous and accessible for users of the commercial space.
- 7.124 In summary, the proposed provision of cycle storage is considered acceptable in accordance with policy requirements.

#### Trip generation

- 7.125 The applicant has provided a transport statement which concludes that the development would have negligible impact on the local transport network.
- 7.126 It is not considered that the proposed development would have a significant impact on existing nearby stations and services. No concerns have been raised by statutory consultees.

## Travel Planning

7.127 A framework travel plan has been provided. A final Travel Plan would be secured and monitored via a s106 agreement.

#### **Environment**

#### Energy & Environmental Sustainability

- 7.128 Generally, a decarbonisation agenda has been adopted at all planning policy levels. Policy SI2 of the emerging London Plan requires major development to be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy.
  - Use Less Energy (Be Lean),
  - Supply Energy Efficiently (Be Clean), and
  - Use Renewable Energy (Be Green)
  - Monitor, verify and report on energy performance (Be Seen).
- 7.129 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 reminder to be offset with cash payment in lieu.
- 7.130 The submitted Energy and Sustainability Statement by The PES, dated November 2022, sets out the proposals to reduce energy demand through energy efficiency measures, efficient heating system (communal air source heat pump) and renewable energy generating technologies (solar panels).
- 7.131 The proposed energy strategy would result in a 2.5 tonnes/CO2 (25.25%) reduction in on-site emissions compared to the GLA's SAP10 baseline. Whilst the percentage reduction in CO2 emissions falls short of the policy requirements, the scheme is delivering an electrical based low carbon ASHP system that will benefit from future decarbonisation of the national grid. A condition will be attached to the permission to secure details of the proposed PV array to ensure that renewable energy generating technologies have been maximised.

- 7.132 In order to support the scheme, the residual CO2 emissions should be offset through a carbon offsetting contribution of £21,090 to deliver a policy compliant net zero carbon development. This contribution will be secured through a planning obligation. In addition, appropriate conditions would be levied to secure the energy proposals, post completion verification and monitoring of the buildings energy performance.
- 7.133 D.ES7 of the Local Plan also states, 'All new non-residential development over 500 square metres floorspace (gross) are expected to meet or exceed BREEAM 'excellent' rating'. The submitted BREEAM pre-assessment identifies that the scheme will achieve BREEAM excellent rating with a score of 70.93%. This is supported and would be secured via condition with final certificates submitted to demonstrate delivery.

#### Air Quality

- 7.134 London Plan policy SI1 and Tower Hamlets Local Plan policy D.ES2 require major developments to submit an Air Quality Assessment demonstrating to meet or exceed at least Air Quality Neutral standard. The site lies within an area of substandard air quality, as set out by in the LBTH Air Quality Management Area (AQMA)28.
- 7.135 The application is accompanied by an Air Quality Assessment, including an Air Quality Neutral assessment, by The PES, which has been reviewed by the Council's Air Quality Officer. The assessment concludes that the proposal would be air quality neutral, in accordance with planning policy.
- 7.136 With regard to building emissions, the proposed development will use Air Source Heat Pumps (ASHP) with photovoltaic technology (PV). Therefore, the proposed development is air quality Neutral with respect to building-related emissions.
- 7.137 The mitigation measures to prevent dust nuisance and air pollution during construction and the life of the development would be secured via a condition, as requested by the Council's air quality officer.
- 7.138 On the basis of the above, it is considered that the proposed development therefore meets the requirements of the Air Quality Neutral Guidance and has No Adverse Impact.

#### Waste

- 7.139 Policy D.MW3 of the Local Plan (2020) requires adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements.
- 7.140 For the commercial unit, the development proposes a refuse store which opens onto Blount Street, located next to the cycle store.
- 7.141 For the student accommodation, provision has been made for 130 litres of waste per student. A bin store is provided on the ground floor, which will be accessed internally through the building, but also accessible onto Blount Street. It is noted that LBTH Waste team preference is for a Underground Recycling and Residual Waste System (URS) for developments of 50 units or more. However, officers consider the bin store facility to be acceptable for a building of just over 100 students, which would be fewer occupants than a scheme of 50 flats.
- 7.142 The proposed arrangement is considered to be appropriate and compliant with planning policy subject to securing a final Waste Management Plan via condition. Details such as the bin store access arrangements and who will manage the collection of waste on collection days, will be secured within this condition.

#### Biodiversity

7.143 London Plan policy G6 and Tower Hamlets Local Plan D.ES3 require developments to protect and enhance biodiversity. Policy D.ES3 requires major development to deliver net gains in biodiversity that contribute to objectives in the Local Biodiversity Action Plan. Policy G5 of the London Plan requires that major development proposals contribute to the greening of London by including urban greening as a fundamental element of site and building design.

- 7.144 The applicant has submitted a Biodiversity Net Gain Assessment and a Landscape Strategy, which was reviewed by the council's Biodiversity Officer. The proposals in the Landscape Strategy include amenity roof terraces at 1st, 3rd and 6th floor levels and extensive green roofs at 1st, 3rd, 4th, 5th, 6th floor and rooftop levels. The proposed extensive roofs total 329 square metres, with substrate depth between 80 and 120mm to provide a varied topography, planted with a mix of sedum and wild flowers, and have additional habitat such as piles of logs. This qualifies as a biodiverse roof and will contribute to LBAP targets.
- 7.145 The proposed planting within the amenity roof terraces would provide a good variety of nectar rich perennials and shrubs. Further, bird, bat and insect boxes have been recommended in the Biodiversity Assessment. Full details of biodiversity enhancements will be secured via condition.

### Flood Risk & Drainage

- 7.146 London Plan Policy SI13 sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.147 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. Policy D.ES6 requires new development to minimise the pressure on the combined sewer network.
- 7.148 The site is located within Flood Zone 1; therefore, the site has no significant risk of tidal or fluvial flooding. There are surface and ground water flooding risks associated within the wider catchment area. Consequently, the application of the London Plan Policy SI 13 and Local Plan Policy D.ES5 are relevant, making sure the proposed buildings freeboard threshold levels and finished floor levels are set to mitigate against any potential flooding risk.
- 7.149 The application is supported by a Flood Risk Assessment (FRA), prepared by The PES. The proposed development has incorporated onsite surface water storage using SUDs features, such as extensive green roofs, a geo-cellular storage tank and a rainwater harvesting butt system to filter rainwater from the buildings down pipes and direct to the landscaped areas. The Council's SUDs officer reviewed the information provided and is agreement to the SUDs features in principle. Conditions securing the maintenance of the drainage scheme have been recommended.
- 7.150 Thames Water Authority have not raised any objection to the scheme, subject to the incorporation of a condition requiring details on a Piling Method Statement.

#### Land Contamination

7.151 The application includes a Desk Study / Preliminary Risk Assessment Report by Jomas Associates Ltd. This has been reviewed by the Council's Environmental Health Contaminated Land Officer. Subject to the inclusion of standard pre-commencement and pre-occupation condition, the proposal is considered acceptable and in accordance with Tower Hamlets Local Plan policy D.ES8.

#### **Health Impact Assessment**

- 7.152 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.
- 7.153 The application is supported by an HIA, authored by Greengage. Notable benefits of the scheme for students includes access to landscaped external spaces, communal social spaces and being in a highly accessible location providing excellent connections into and around the city. For the wider community, the development will provide benefits such as employment opportunities and active ground floor uses.

## Infrastructure Impact

- 7.154 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £736,650 and Mayor of London CIL of approximately £176,040.
- 7.155 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.
- 7.156 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:
  - £16,300 towards construction phase employment skills training
  - £2,864.68 towards end-user phase employment skills training
  - £4,075.00 towards development Coordination and Integration
  - £21,090 toward carbon emission off-setting

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

- 7.157 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.
- 7.158 The proposed student accommodation would exceed the policy requirement for wheelchair accessible units, providing 10 wheelchair units in total which meet the inclusive design standards. Further, the proposed affordable student housing would be of particular benefit to students that are socially/economically disadvantaged.
- 7.159 For the wider community, the proposal would provide opportunity for employment within high quality workspace.
- 7.160 The application has undergone the appropriate level of consultation with the public and Council consultees. The applicant has also carried out an extensive engagement with the existing residents of the surrounding area.
- 7.161 The proposed development would not result in adverse impacts upon equality or social cohesion.

#### 8. RECOMMENDATION

8.1 That subject to any direction by the Mayor of London, **conditional planning permission is GRANTED** subject to the prior completion of a legal agreement to secure the following planning obligations:

## 8.2 Financial obligations

- a. £16,300.00 towards construction phase employment skills training
- b. £2,864.68 towards end-user phase employment skills training
- c. £21,090.00 toward carbon emission off-setting
- d. £4,075.00 towards Development Coordination and Integration
- e. £12,716.48 monitoring fee

Total financial contributions: £57,045.68.

## 8.3 Non-financial obligations:

- a. Affordable student accommodation (35%) 37 units
- b. 10 Wheelchair accessible units
- c. Nominations agreement (to take place prior to occupation)
- d. Access to employment
  - 20% local procurement
  - 20% local labour in construction
  - 2 construction phase apprenticeships
- e. Transport matters:
  - Car Free development
  - Approval and implementation of a Travel Plan
  - S278 Agreement (works to the kerb line and cost associated with providing on-street loading bay and associated waiting restriction).
  - Additional Blue Badge parking (should demand require)
- f. Compliance with Considerate Constructors Scheme
- 8.4 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Place is delegated power to refuse planning permission.
- 8.5 That the Corporate Director of Place is delegated the power to impose conditions and informatives to address the following matters:

## 8.6 Planning Conditions

#### Compliance

- 1. 3 years deadline for commencement of development.
- 2. Development in accordance with approved plans.
- 3. Restrictions on demolition and construction activities:
  - a. All works in accordance with Tower Hamlets Code of Construction Practice;
  - b. Standard hours of construction and demolition;
  - c. Air quality standards for construction machinery;
  - d. Ground-borne vibration limits; and
  - e. Noise pollution limits.
- 4. Light industrial uses only in commercial space (Class E(g)(iii)
- 5. Outdoor terrace opening hours restricted to 8am 10pm
- 6. Cycle storage
- 7. Noise from plant level maintained.

#### Pre-commencement

The inclusion of the following pre-commencement conditions has been agreed in principle with the applicants, subject to detailed wording.

- 8. Construction Environmental Management Plan and Construction Logistics Plan (in consultation with TfL):
- 9. Land Contamination Remediation Scheme (subject to post completion verification).

- 10. Dust Management Plan and PM10 Monitoring.
- 11. Details of plant machinery to be used at the demolition and construction phases.
- 12. Piling Method Statement (in consultation with Thames Water).

## Pre-superstructure works (above ground works)

- 13. Details of external facing materials and architectural detailing.
- 14. Details of hard and soft landscaping of all public realm and open spaces including furniture and lighting.
- 15. Biodiversity enhancements.
- 16. Secured by design strategy detailing measures.
- 17. SUDs maintenance provisions.

## Pre-occupation

- 18. Noise verification report
- 19. Deliveries and Servicing Plan
- 20. Waste Management Plan
- 21. Energy assessment with 'As built' calculations
- 22. Full details of proposed PV array
- 23. Secured by Design accreditation certificate

## Post Occupation

- 24. BREEM rating certificates
- 25. GLA 'Be Seen' verification report

#### 8.7 Informatives

- 1. Permission subject to legal agreement.
- 2. Development is CIL liable.
- 3. Thames Water proximity to assets.
- 4. Network Rail infrastructure

#### **APPENDIX 1**

## LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

```
1043 - X - 0000 - GA - 1 - Site Location Plan
1043 – X – 0001 – GA – 1 - Existing Site Plan
1043 – X – 0002 – GA – 1 - Existing Site Plan
1043 – X – 0010 – GA – 1 - Existing Ground Floor Plan
1043 - X - 0040 - GA - 1 - Existing East Elevation
1043 – X – 0041 – GA – 1 - Existing South Elevation
1043 – X – 00101 – GA – 2 – Proposed Site Plan
1043 - X - 00102 - GA - 2 - Proposed Site Plan
1043 – X – 0200 – GA – 13 – Proposed Ground floor Layouts
1043 – X – 0201 – GA – 10 – Proposed First floor Layouts
1043 – X – 0202 – GA – 10 – Proposed Second floor Layouts
1043 - X - 0203 - GA - 10 - Proposed Third floor Layouts
1043 - X - 0204 - GA - 9 - Proposed Fourth floor Layouts
1043 - X - 0205 - GA - 9 - Proposed Fifth floor Layouts
1043 – X – 0206 – GA – 9 – Proposed Sixth floor Layouts
1043 – X – 0207 – GA – 9 – Proposed Roof Layouts
1043 - X - 00300 - GA - 2 - Proposed Section A-A
1043 - X - 00301 - GA - 2 - Proposed Section B-B
1043 - X - 00302 - GA - 2 - Proposed South & East Long Sections
1043 – X – 0400 – GA – 3 – Proposed East Elevation
1043 – X – 0401 – GA – 3 – Proposed South Elevation
1043 – X – 0402 – GA – 3 – South & East Street Elevation
1043 – X – 0403 – GA – 3 – Proposed West Elevation
1043 – X – 0404 – GA – 3 – Proposed North Elevation
PLA 0058 SD 001 R01 – Illustrative Landscape Plan
```

#### Other application documents

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Air Quality Assessment – Prepared by The PES (17 November 2022)
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Biodiversity Impact Assessment – Prepared by Greengage (November 2022)

Construction & Environmental Management Plan – Prepared by The PES (November 2022)

Daylight and Sunlight Addendum Report - Prepared by eb7 (02 March 2023)

Daylight and Sunlight Report – Prepared by eb7 (28 November 2022)

Design and Access Statement - Prepared by pH+ Architects (November 2022)

Desk Study / Preliminary Risk Assessment Report – Prepared by JOMAS Ltd (Sept 2021)

Energy & Sustainability Statement - Prepared by The PES (17 November 2022)

Fire Statement – dated 23.11.2022.

Foul Sewerage & Utility Statement – Prepared by Seneca (Oct 2022)

FRA & SuDS Strategy Statement – Prepared by The PES (25 November 2022)

Framework Travel Plan – Prepared by RPS (28 November 2022)

Health Impact Assessment – Prepared by Greengage (November 2022)

Healthy Streets Transport Assessment – Prepared by RPS (28 November 2022)

Heritage Impact Assessment – Prepared by HCUK Group (September 2022)

Landscape Strategy – Prepared by PLAN Design Landscape Architects (November 2022)

MEP Services Strategy – Prepared by Seneca (October 2022)

Noise & Vibration Impact Assessment – Prepared by ALN Acoustic Design (November 2022)

Outline Delivery and Servicing Plan – Prepared by RPS (03 Feb 2023)

Planning Statement – Prepared by Maddox Planning (November 2022)

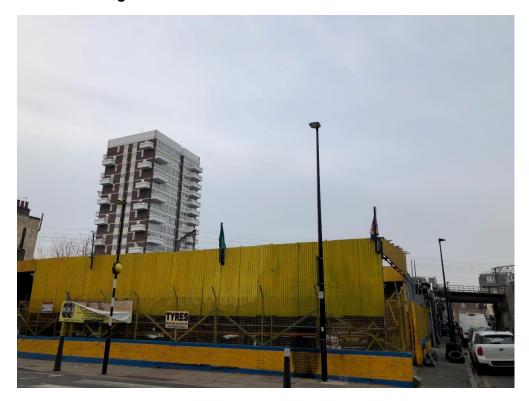
Preliminary Ecological Appraisal – Prepared by Greengage (November 2022)

Reuse, Recycling and Waste Plan – Prepared by pH+ Architects (Feb 2023)

Statement of Community Involvement – Prepared by Carvil Ventures Ltd (November 2022) Unit Area Schedule (17.02.2023)

Wind Assessment - Prepared by SLR (November 2022)

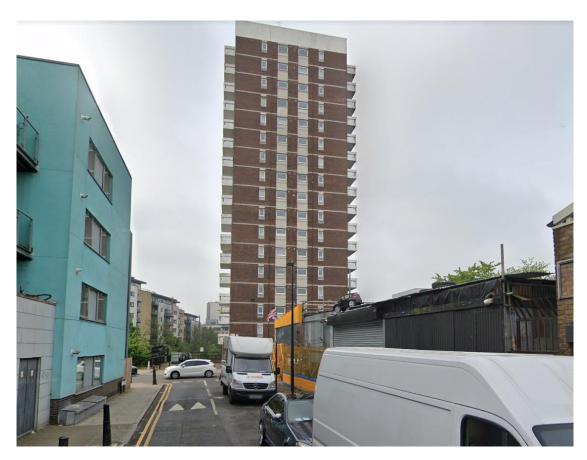
## **APPENDIX 2 – Existing Site Photos**



View from Salmon Lane looking North with Blount Street on the right of this image. Darnley House is the visible tall building which is 17 storeys of residential flats.



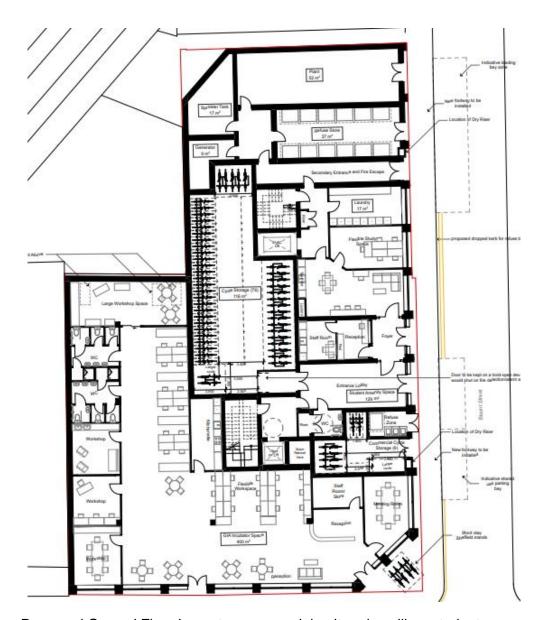
View from Salmon Lane looking West, with the flank wall of the Prince Regent Pub siding the site.



View from Blount Street looking South. The application site is visible along the right of this image. 1 – 35 Rayners Terrace is a residential block located on the left of this image in blue.

Anglia House is the central tower which is 17 storeys of residential flats.

## **APPENDIX 3 – Proposed Drawings**



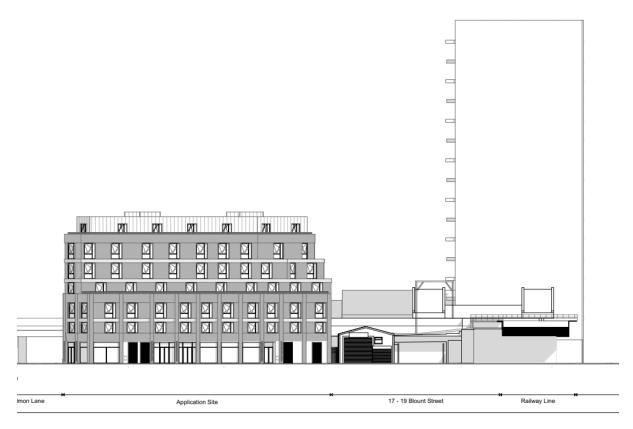
Proposed Ground Floor Layout – commercial unit and ancillary student space.



Proposed First Floor Layout – comprises communal social space, outdoor amenity space and student units (2 x cluster units located to the northern part and studio units within the central and southern part).



Proposed Third Floor Layout – this plan demonstrates 5 x cluster units located at the northern part of the site and 14 x studio units on the central and southen part of this floor. There is a third floor terrace located on the western side of the site.



Proposed Blount Street elevation (street scene)



Proposed Salmon Lane elevation (street scene)