

Committee: Strategic Development Committee	Date: 3 rd November 2005	Classification: Unrestricted	Report Number: SDC006/056	Agenda Item Number: 5.1
Report of: Director of Development and Renewal		Title: Town Planning Application		
Case Officer: Renee Goodwin		Location: 10 TO 20 DOCK STREET, LONDON, E1 8JP		
		Ward: St Katharine's and Wapping		

1. SUMMARY

1.1 Registration Details

Reference No: PA/04/993 (Scheme A)

Date Received: 01/07/2004

Last Amended Date: N/A

1.2 Application Details

Existing Use: Offices with adjoining vacant office, warehouse and yard.

Proposal: Demolition of buildings and erection of three buildings consisting of 7 storeys (Block A), part 7 and part 13 storeys (Block B) and 7 storeys (Block C) to create commercial use on part ground and part basement floors and 95 flats on part basement, part ground and all upper floors.

Applicant: Purple Property Holdings Limited c/- Dalton Warner Davis

Ownership: P Bartello, Elisabeth Giles, Martin Kuzmidiz, Buzzy Moiter

Historic Building: N/A

Conservation Area: N/A

2. RECOMMENDATION:

2.1 That the Director of Development and Renewal is instructed to inform the Planning Inspectorate that had the Council been empowered to make a decision on the application, it would have **REFUSED** planning permission for the following reasons:

- 1) The application does not include evidence of marketing with respect to the loss of employment floor space to justify the loss of employment floor space in this location. In light of this, it is considered that the proposed change of use could result in an unacceptable loss of employment floor space. As such the proposal is contrary to Policies EMP2 and CAZ3 of the Tower Hamlets Unitary Development Plan (adopted 1998) and EMP3 and EMP10 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to ensure that an adequate supply of land is safeguarded to enhance employment opportunities within the Borough.
- 2) The percentage of affordable housing proposed does not accord with the Council's targets to ensure the continued delivery of affordable housing in the Borough. The proposal is thus contrary to Policy HSG3 of the Tower Hamlets Unitary Development Plan (adopted 1998), and Policy HSG4 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to ensure that affordable housing is provided on-site to ensure the continued delivery of affordable housing in the Borough.
- 3) Details of the location, ratio and mix of the proposed affordable housing units has not been provided. In these circumstances, the Council consider that the proposed development is contrary to Policy HSG5 of the 1st Deposit Draft (May 2004) of the Tower

**LOCAL GOVERNMENT ACT 2000 (Section 97)
LIST OF BACKGROUND PAPERS USED IN THE DRAFTING OF THIS REPORT**

Brief Description of background paper: Tick if copy supplied for register
Application case file, plans and
& UDP

Name and telephone no. of holder
Development Control 020 7364 5338

Hamlets Unitary Development Plan, which seeks to ensure that an appropriate mix of social rented to intermediate market housing for affordable housing to reflect the Borough's needs identified in the 2004 Housing Needs Survey is provided and to ensure that affordable housing is integrated with the rest of the development.

- 4) A significant number of studios (26%) and one bedroom flats (41%) and a limited number of family housing, being three or more bedroom units is proposed. The dwelling mix and type of the proposed housing does not accord with the housing types and sizes identified to meet local needs. The proposal is thus contrary to Policy HSG7 of the Tower Hamlets Unitary Development Plan (adopted 1998), and Policy HSG8 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to ensure that housing accommodation in new residential developments and mixed-use schemes include those housing types and sizes to meet local needs and promote balanced communities in accordance with the Government's sustainable community agenda.
- 5) A number of the proposed unit/ room sizes (including those proposed to be located in the basement), by reason of their proposed internal layout would constitute an undesirable form of development, giving rise to a poor living environment for future occupiers as a result of:
 - (a) poor outlook;
 - (b) lack of natural light and ventilation; and
 - (c) cramped bedroom sizes.

The proposal is thus contrary to Policy DEV1 of the Tower Hamlets Unitary Development Plan (adopted 1998), Policy ENV1 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan and the Council's Supplementary Planning Guidance 'Residential Space', which seeks to ensure a quality living environment for future occupiers.

- 6) It is considered that the height of all elements of the scheme are excessive in this context and:
 - (a) would seriously and detrimentally challenge the spire of St Paul's Church (Ecclesiastical Grade C Listed Building);
 - (b) would detrimentally effect the setting of St Paul's Church;
 - (c) would be inconsistent with the prevailing urban character of the area, the tower being the significantly higher than the predominant roof height in Dock Street, and
 - (d) would significantly alter the character of the street by replacing the existing dominant architectural feature of St Paul's Church spire with a 13 storey tower

As such, the proposal is contrary to Policy DEV1, DEV5, and DEV39 of the Tower Hamlets Unitary Development Plan (adopted 1998) and Policy UD7 and UD17 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to support tall building proposals in appropriate locations and resist development that would harm the setting of a listed building.

- 7) The proposal represents an undesirable form of overdevelopment of the site by reason of its excessive density, resulting in:
 - (a) loss of light to adjacent residents, including Blocks A, B and C of the Peabody Housing Estate;
 - (b) increased sense of enclosure to adjacent residents, including Blocks A, B and C of the Peabody Housing Estate;
 - (c) loss of privacy/ overlooking to adjacent residents, including Blocks A, B and C of the Peabody Housing Estate; and
 - (d) would provide a poor living environment for the prospective occupiers, i.e. generally cramped site layout, lack of natural light and ventilation, poor outlook, deficient unit/ room sizes and lack of on site amenity space.

The proposal is thus contrary to Policy HSG9 of the Tower Hamlets Unitary Development Plan (adopted 1998) and Policy HSG9 and UD7 of 1st Deposit Draft (May

2004) of the Tower Hamlets Unitary Development Plan, which seek to ensure that high densities are only supported where consistent with other Plan policies.

- 8) The development, because of its height, bulk and proximity to adjacent occupiers, will result in an unacceptable adverse impact on the sunlight/ daylight conditions of Blocks B and C of the Peabody Housing Estate. The proposal is thus contrary to Policy DEV5 of the Tower Hamlets UDP (adopted 1998) and Policy UD7 of the 1st Draft Deposit (May 2004) of the Tower Hamlets Unitary Development Plan, which seeks to mitigate the impacts of tall buildings on the immediate surroundings.
- 9) Insufficient information has been submitted to fully ascertain the microclimate (sunlight/ daylight and wind) impacts of the proposed development, and in the absence of detailed assessments, an informed judgement of the impacts cannot be made. The proposal is thus contrary to Policy DEV5 of the Tower Hamlets UDP (adopted 1998) and Policy UD7 of the 1st Draft Deposit (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to mitigate the impacts of tall buildings on the immediate surroundings.
- 10) The proposal by reason of its height, bulk and proximity to the opposite habitable rooms (being, the ground to fourth floors of Block A and B of the Peabody Housing Estate) would result in:
 - (a) an unacceptable loss of privacy/ overlooking to the detriment of the occupiers and adjoining residents; and
 - (b) an increased sense of enclosure to the detriment of the occupiers and adjoining residents.

It would therefore cause a material loss of amenity to the occupiers and adjoining residents and is thus contrary to Policy DEV1 of the Tower Hamlets Unitary Development Plan (adopted 1998) and ENV1 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to protect the amenity of occupiers and neighbours.

- 11) The proposed residential development provides an inadequate amount of private open space for use by individual dwellings to the detriment of the amenity of the proposed dwellings. It is therefore considered that the proposal is contrary to Policy HSG16 of the Tower Hamlets Unitary Development Plan (adopted 1998) and Policy HSG12 and UD7 of the 1st Deposit Draft (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to ensure the provision of adequate amenity space.

3. BACKGROUND

Site and Surrounds

- 3.1 The site is situated on the west side of Dock Street on the corner of Flank Street. Dock Street lies between Royal Mint Street to the north and East Smithfield/ The Highway to the south. The site consists of two parts and is divided by Flank Street, with a total area of 0.109ha.
- 3.2 The site is currently occupied by 2425sqm of commercial and residential use in three separate buildings, ranging in height from 2 – 4 stories, consisting of the following:
 - 10 – 14 Dock Street: (A1 only) and 3 residential flats;
 - 16 – 18 Dock Street: Vacant since 1997 (previously B1); and
 - 20 Dock Street: B1 and partly vacant.
- 3.3 The surrounding area comprises a mix of uses, including pubs, hostel, nursery, estate agent, some housing and light industrial buildings. Directly opposite the site on the eastern side of Dock Street is a 3 storey Georgian Townhouse formally known as the Vicarage (Grade II Listed) and St Paul's in the East Church which is used as a nursery (Ecclesiastical Grade C Listed Building). The site is not within a Conservation Area. However, it is located to the north eastern boundary of the Tower Conservation Area.
- 3.4 Immediately north of, and adjacent to the site, is a 4 storey residential block. To the immediate south of the site is a 4 storey public house and further south of the site is a 3

storey data centre. The Peabody Housing Estate is located adjacent to and west of the site. This comprises of a series of 5/6 storey residential blocks.

- 3.5 Further north of the site at Royal Mint Street are a series of higher office buildings, these buildings are visually separated from the site by the elevated DLR line.
- 3.6 The prevalent building height is inconsistent on the east side of Dock Street, ranging in height from 7 storeys (Look Ahead Housing Association) to 3 storeys (e.g. 3 storey Georgian Townhouse formally known as the Vicarage (Grade II Listed)). The west side of the street is more uniformly 4 – 5 storeys.
- 3.7 The site is approximately 500m from the Tower Gateway DLR Station, 600m from the Tower Hill Underground Station and within 1km of the Fenchchurch Street mainline station and 800m from Shadwell DLR Station. A number of bus routes are within close proximity of the site.

Relevant Planning History

- 3.8 Planning Permission (PA/98/1297) was granted at 16 – 20 Dock Street for the demolition of the existing building and erection of a 7 storey (4000sqm) B1 office building with basement parking and landscaping, on 7th August 1998. This scheme has not been implemented.

Current Proposal

- 3.9 Council received the application, which is the subject of the planning appeal, on 1st July 2004. The application sought full planning permission for the demolition of buildings and erection of three buildings consisting of 7 storeys (Block A), part 7 and part 13 storeys (Block B) and 7 storeys (Block C). The proposal includes commercial use on part ground floor and part basement floors and 95 flats on part of the basement, part ground and all upper floors.
- 3.10 Scheme A includes:
- Commercial uses totalling 595sqm (net). The commercial uses applied for include A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments), A5 (hot food and takeaways) and B1 (business).
 - A total of 95 residential units or 6,851sqm residential floor space.

4. PLANNING POLICY FRAMEWORK

- 4.1 The following Unitary Development Plan **proposals** are applicable to this application:

- (1) Central Area Zone
- (2) Areas of Archaeological Importance

- 4.2 The following Unitary Development Plan **policies** are applicable to this application:

- DEV1 Design Requirements
- DEV2 Environmental Requirements
- DEV3 Mixed use developments
- DEV4 Planning Obligations
- DEV 5 High Buildings and Views
- DEV12 Landscaping
- DEV13 Tree Planting
- DEV18 Public Art
- DEV39 Development Affecting Setting of Listed Building
- DEV45 Development in areas of archaeological importance
- DEV56 Litter and Waste
- CAZ3 Mixed Use Development
- EMP1 Promoting Employment Growth
- EMP2 Protection of Employment Uses
- EMP 3 Surplus Office Floorspace
- EMP6 Access to Employment

HSG2	New Housing developments
HSG3	Affordable Housing
HSG7	Dwelling mix and type
HSG8	Dwelling Accessibility
HSG9	Maximum Density
HSG11	Minimum Density
HSG13	Internal standards for residential developments
HSG16	Amenity space
T9	Strategic Restraint
T15/T16	Transport and development
T17	Parking standards
T21	Protection of pedestrian routes
T24	Cyclists

4.3 The following New Unitary Development Plan Draft **proposals** are applicable to this application:

- (1) Central Area Zone
- (2) Employment (Schedule B - No. 66)
- (3) Archaeological importance or potential

4.4 The following New Unitary Development Plan Draft **policies** are applicable to this application:

EMP1	Promoting economic growth and employment opportunities
EMP2	Mixed use development
EMP3	Central Activities Zone
EMP5	Alternative development of Office space
EMP6	Range of Unit sizes and managed workspaces
EMP8	New Build Residential/Employment Mixed-use proposals
EMP10	Redevelopment of Change of Use of Employment Sites
HSG2	New Housing Developments
HSG4	Affordable Housing Target
HSG5	Affordable Housing Ratio and Mix
HSG8	Dwelling Type and Mix
HSG9	Housing Density
HSG10	Lifetime Homes and Wheelchair/Mobility Housing
HSG12	Amenity Space
SF1	Social Facilities
TRN1	Transport and Development
TRN2	Public Transport Schemes
TRN6	Parking and servicing
TRN7	Transport Assessments
TRN8	Travel Plans
TRN11	Bicycle Facilities
UD1	Scale and density
UD2	Architectural Quality
UD3	Ease of movement and Access Through Inclusive Design
UD4	Design Statements and Access Statements
UD5	Safety and security
UD7	Tall Buildings and Large Development Proposals
UD8	Important Views
UD9	Public Art
UD11	Landscaping
UD16	Areas of Archaeological Importance
UD17	Protecting and Enhancing Statutory Listed Buildings
ENV1	Amenity
ENV5	Disturbance from Demolition and Construction
ENV8	Energy Efficiency
ENV11	Waste Disposal and Recycling Facilities
ENV12	Recycling of Construction Waste
ENV27	New Open Space Provision
IM1	Planning Agreements

CFR1 Development Nodes
CFR3 Activity Nodes
CFR6 Access

4.5 The following **Community Plan objectives** are applicable to this application:

- (1) A better place for living safely – reduction in crime and improved safety.
- (2) A better place for living well – quality affordable housing and access to health care, leisure and retail facilities.
- (3) A better place for creating and sharing prosperity – a centre for business and trade, more jobs for local people, community involvement in planning, and higher living standards.

London Plan

4.6 The London Plan, which provides the strategic planning policy framework for London, was adopted on 10 February 2004. The application was thus post the adoption of this plan.

4.7 One of the key objectives of the Plan is the need to increase the supply of housing within London. An annual target of 30,000 additional homes has been set within the Plan. The target for Tower Hamlets is over 41,280 additional homes between 1997 and 2016, with an annual monitoring target of just over 2,000 new homes.

4.8 Another key objective is to increase the amount of affordable housing, and to that end Policy 3A.7 sets out the Mayor's strategic target of 50% of housing proposals being affordable. Policy 3A.8 states that, Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes, having regard to the affordable housing targets adopted in line with policy 3A.7, the need to encourage rather than restrain residential development and the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

4.9 The London Plan also generally encourages developments to achieve the highest possible intensity of use, in appropriate locations, provided amongst other things, that they are compatible with the local context, respect London's built heritage, sensitive to their impact on micro-climates and pay particular attention to privacy, amenity and overshadowing.

4.10 Under the London Plan, the site is within the East London Sub-region. East London is identified as a priority area for development, regeneration and infrastructure improvement.

The strategic priorities for the East London (Policy 5C.1) include:

- Deliver the London element of the government's priority for the Thames Gateway for development, regeneration and transportation improvement;
- Identify capacity to accommodate new job and housing opportunities and appropriate mixed-use area;
- Maximise the number of additional homes, including affordable housing by exceeding housing provision targets set out in this plan, and secure mixed and balanced communities;
- Plan for and secure the necessary financial resources to deliver planned transport infrastructure for the sub-region including local schemes that improve public transport, walking and cycling connections to town centres and employment locations.

5. CONSULTATION

5.1 The following were consulted regarding this application:

(1) **Greater London Authority**

The GLA First Stage Report was not available at the time of writing. It is anticipated that the report will be presented verbally at the Strategic Development Committee.

(2) **English Heritage**

The principal concern is the impact of the proposal on the setting of the adjacent listed buildings and the surrounding townscape.

Dock Street and its immediate surroundings are characterised by a fairly consistent pattern of four to five storey development, much of which is surviving and adapted nineteenth century warehousing or light industrial building types, and the Peabody Trust housing scheme immediately behind the site. Within this the spire of St Paul's Church forms the obvious original landmark. The adjacent, modern housing association building on the east side of the street (approximately 7 storeys) provides one of the few aberrations from this original pattern in the immediate vicinity.

The height of all elements of the scheme are excessive in this context. The role of the spire of St Paul's as the original focal point of the street within an established cluster of lower buildings (i.e. four and five storey form of the street) will be seriously and detrimentally challenged by the proposed development.

A deferential relationship showing the spire of St Paul's so as to ensure that it remains the focal point of the street, is of critical importance.

(3) **Thames Water**

Conditions and informatives recommended.

(4) **English Heritage (Archaeology)**

Conditions recommended.

(5) **Cleansing**

No response received.

(6) **Environmental Health**

Environmental Health

Recommended the following conditions:

- Sound insulation to habitable rooms due to high-expected levels of road and rail;
- Mechanical ventilation from kitchens;
- Preparation of an air quality scheme; and
- Contamination investigation scheme (given the location of the site adjacent to a former gas work).

Environmental Health - Microclimate

Council's Environmental Health officer is not able to recommend planning permission for the micro-climate (sunlight/ daylight and wind) aspects of the scheme in its current form.

The sunlight daylight information submitted is considered deficient as follows:

1. The report does not identify the internal impacts to residents within the development, i.e. the impact of Block A on Block B, and the impact of Block B on Block C;
2. The report does not address the cumulative impact of:
 - The development on 9 Dock Street (Look Ahead Housing Association, 7 storeys);
 - the development on 11 Dock Street;
 - Block A, B and C on the adjacent properties, i.e. 12 – 14 Dock Street (which is a 4 storey residential building); and
 - Proposed Block C (7 storeys) on Block A of the Peabody Housing Estate (5 storeys).
3. A shadow analysis or sunpath analysis is required to determine how many hours of sunlight to sunset would be available to the Peabody Housing Estate. The analysis is to include all 4 equinoxes, i.e. 21st March, 21st June, 21st September

- and 21st December; and
4. Further analysis is required for 11 Dock Street (Grade II Listed Building – Vicarage, currently used as a townhouse) and should include average daylight factor (ADF), vertical sky component (VSC) and sunpath analysis.

Furthermore, the development will result in an unacceptable adverse impact on Blocks B and C of the Peabody Housing Estate, including ground through to fourth floor.

The wind assessment information submitted is considered deficient as follows:

1. The wind assessment report is desk based. This is unacceptable, wind sensing monitors are required to be set up on site;
2. The report has not demonstrated the windiness of the new development in relation to the existing development to enable the Council to make an informed judgement. The assessment is required to be carried out using sensors to demonstrate the existing development, proposed development, and proposed development with mitigation. This information is required to support the claim that Dock St is suitable for 'standing' and enable the Council to make an informed judgement;
3. The report has not addressed the cumulative impact of the proposal on all neighbouring properties;
4. The junction of Flank Street and Dock Street is no longer acceptable for 'standing' as a result of the proposed development, the Council would accept conditions for 'walking', however, this has not been demonstrated; and
5. The report has not demonstrated the change (between the existing and proposed development) in the "Lawson Comfort Criteria for Pedestrian Level Wind Environment". This information is required to enable the Council to make an informed judgement of the impact of the proposed development.

(7) **Highways**

No objection subject to:

- Car free agreement; and
- Section 278 agreement to carry out off site highway works.

(8) **Conservation and Urban Design**

The Council's Design and Conservation officer objects to the proposal as the proposal:

- Does not address the prevailing urban character of the area,
- The tower proposed being significantly higher than the predominant roof height in Dock Street;
- Detrimentally effects the setting of St Paul's Church; and
- Significantly alters the character of the street by replacing the existing dominant architectural feature of St Paul's spire with a 13 storey commercial tower block.

(9) **Housing**

The Council's Housing officer objects to the proposal as Council's 1st Deposit Draft UDP requires 35% and the applicant should consider the London Plan. The officer also commented that:

- An RSL partner is required; and
- The location of the site makes it of strategic importance and a high quality scheme is required.

(10) **Access Officer**

The Council's Access officer provided the following comments:

1. Will the residential units be built to Lifetime Home Standard?

2. Will any of the residential units be built to the space standards required of potential wheelchair housing?
3. Will access to external areas be flush?
4. How will the proposed ground floor full height glazing be made visually distinct?
5. Will there be any on street accessible parking?
6. How will the applicant ensure that the development is built inclusively and considers the needs of disabled people through out the development process?

(11) **Crime Prevention Officer**

Issues associated with security, privacy and transitional spaces highlighted.

5.2 Responses received from residents are summarised below:

No. Responses: 7 In Favour: 0 Against: 7 Petition: 0

Height, Density and Scale

- The proposed increases in height are not in keeping with the area;
- The development does not comply with the overwhelming numbers of buildings in the area south of the DLR that are either 4 or 5 storeys in height;
- No correspondence between the plan and the proposed tower block and the existing church steeple;
- The proposal represents overdevelopment of the site;

Microclimate

- The sunlight/ daylight study has not considered 11 Dock Street;

Access and Transport

- No consideration for residential parking for the 95 extra residential flats;
- No new parking will be provided in the development. People will still acquire permits or park in the nearby streets;

Other

- Negative impact on television and satellite reception;
- Negative impacts will arise during construction;
- Pleased to see this application and uplift of the surrounding area. However, they objected to any glass or window detail facing north and looking over the roofline of No. 8 Dock Street.

6. ANALYSIS

The main key issues with the scheme are:

- 1) the level of affordable housing; and
- 2) the height of the building with respect to St Pauls Church (Ecclesiastical Grade C Listed Building) and the height of the proposed scheme in the context of Dock Street.

Extensive discussions were held with the applicant. However, a satisfactory solution could not be secured, despite several suggested amendments.

6.1 Land Use Considerations

6.1.1 The site is currently occupied by the following buildings:

Address	Use
No. 10 – 14 Dock Street	(A1 only) A1 and 3 residential flats
No. 16 – 18 Dock Street	Vacant (previously used as rag trade store, vacant since 1997)
No. 20 Dock Street	B1 and partly vacant

6.1.2 The current use of the floor space is:

Current Use	Area
Residential floor space	240sqm (or 3 flats)

Retail floor space	140sqm
Office floor space	1300sqm
Warehousing floor space	745sqm
Total	2425sqm

6.1.3 The proposal is for a total of 6851sqm of residential floor space and 595sqm of commercial, being either retail or office floor space.

Tower Hamlets Unitary Development Plan (Adopted 1998)

6.1.4 The site is included in the “Central Area Zone” (CAZ) on the Proposals Map of the adopted UDP and the existing buildings comprise of approximately 2,285sqm of floor space used or last used for employment use.

6.1.5 Policy EMP2 of the UDP specifies that on sites last used for employment generating uses, the Council will oppose development resulting in a loss of those uses. The policy (EMP2.8 and EMP2.9) includes some exceptions, such as:

- *Where non B class development proposals are likely to generate employment, such uses being considered against the gains afforded by the individual scheme particularly those offered to the local unemployed and the environmental and traffic implications of the proposal; or*
- *Where the site or building remains vacant after having been made actively marketed for a reasonable length of time at a value prevailing in the area for employment-generating land uses.*

6.1.6 The proposal includes a total of 595sqm of commercial use, including A1 (retail), A2 (financial and professional services), A3 (food and drink) and B1 (business). The commercial uses are located within part of the basement and part of the ground floor and are divided into 4 separate commercial duplex units. Each of the commercial units has direct frontage and access from Dock Street. One of the units will provide replacement accommodation for the existing real estate that currently occupies the ground floor of 10 – 14 Dock Street.

6.1.7 The type of each commercial unit and size is listed below:

- A.G.06: 126sqm
- A.G.04: 198sqm
- B.G.01: 179sqm
- B.G.03: 92sqm
- Total: 595sqm

6.1.8 However, the application does not include evidence of marketing with respect to the loss of employment floor space to justify the loss of class “B1” floor space in this location. Consequently, the proposal could result in an unacceptable loss of employment floor space. As such, the proposal is contrary to Policy EMP2 of the Tower Hamlets Unitary Development Plan (adopted 1998), which seeks to ensure an adequate supply of employment floor space or justify its loss.

6.1.9 As the site is situated in the Central Area Zone, Policy CAZ3, which seeks mixed used (business and retail) schemes, is also applicable to the assessment of the scheme. The supporting text (para. 5.11) acknowledges that, whilst it may be physically practical to provide residential accommodation in the CAZ through redevelopment of surplus office accommodation, the quality of that accommodation will be of primary consideration. The text continues that, the housing provided should comply with the housing policies of this Plan, paying particular attention to the need for adequate daylighting and sunlighting and the provision of social, recreational and community facilities within the vicinity of the development.

6.1.10 In this instance, the proposal conflicts with the objectives of the Central Area Zone. Firstly, the application does not include a justification for the loss of employment space in accordance with Policy EMP2. Secondly, the policy specifies that the housing provided should comply with the housing policies of the Plan, paying particular attention to the need for adequate daylighting and sunlighting and the provision of social, recreational and community facilities within the vicinity of the development. The proposal is thus contrary to

Policy CAZ3 of the Tower Hamlets Unitary Development Plan (adopted 1998), which specifies that the quality of the residential accommodation will be of primary consideration and should comply with the policies of the plan.

First Deposit Draft UDP (May 2004)

- 6.1.11 The site (No. 10 – 20 Dock Street) is included in the “Central Activities Zone” on the Draft Proposals Map. However, part of the site (No. 16 – 20 Dock Street) is also designated “Employment” on the Draft Proposals Map. In addition, No. 16 – 20 Dock Street is included in Schedule 8, “Employment and Industrial Employment – No. 66” and Development Site CFR9 of the City Fringe Area Action Framework. CFR9 states that, “An application was recently approved for the erection of a 7 storey building providing 4,205sqm of office space. Maintain east-west connection through the site.”
- 6.1.12 Policy EMP 3 of the 1st Deposit UDP considers that clusters of specialist activity in and around the Central Activities Zone are identified in the City Fringe Area Action Framework and their activities will be protected and supported. The proposal involves the redevelopment of the existing employment site.
- 6.1.13 Redevelopment of employment sites will be considered in accordance with Policy EMP 10, of the 1st Deposit UDP, where:
- (a) *there is evidence that the possibilities to reuse or redevelop the site for a similar or alternative business use has been fully explored;*
 - (b) *there is availability of an alternative site which may be better located for employment uses;*
 - (c) *the new proposal is of high architectural quality and contributes to a regeneration programme to improve the area;*
 - (d) *the retention or creation of new employment and training opportunities which meet the needs of local residents are maximised in any new proposal, especially for a mixed-use proposal; and*
 - (e) *the overall loss of employment, and the employment needs of the local community, and other policies contained in this plan have been taken into account.*
- 6.1.14 The application did not include evidence of marketing with respect to the loss of employment floor space to justify the claim that there is no demand for “B1” floor space in this location. In light of this, it is considered that the proposed change of use could potentially result in an unacceptable loss of employment floor space. As such, the proposal is contrary to Policies EMP3 and EMP10 of the 1st Deposit Draft UDP, which seek to ensure that an adequate supply of land is safeguarded to enhance employment opportunities within the Borough.

6.2 Housing

- 6.2.1 The scheme includes a total of 95 residential units. The following is a summary of the overall mix of units by unit type:

Block A

9 x studios
12 x 1 bedrooms
13 x 2 bedrooms

Block B

16 x studios
27 x 1 bedrooms
3 x 2 bedrooms

Block C

6 x 2 bedrooms
9 x 3 bedrooms

Affordable Housing

- 6.2.2 UDP 1998 Policy HSG3 requires that 25% affordable housing be provided on all housing developments with a capacity for 15 dwellings or more, with calculations to be on a unit basis. However, Policy HSG4 under Council’s emerging Draft UDP requires an increased

provision of 35% affordable housing, calculated on a floor space basis. This is further supported by the adoption of the London Plan in February 2004, which requires a 50% affordable housing provision.

- 6.2.3 At time of lodgement of Scheme A (1 July 2004), the application stated that the amount of affordable housing to be provided as part of the scheme, is to be agreed as part of the negotiations with the Local Planning Authority. The applicant considered that the affordable housing provision should take into account the commercial viability of the scheme, lack of public subsidy and the results of the Greater London Authority's Toolkit analysis.
- 6.2.4 The applicant later submitted a copy of the 'GLA's Toolkit Appraisal' (27 August 2004) which indicated that for the scheme to remain financially viable, 9.3% of the total habitable rooms in the scheme could be provided in the form of affordable housing.
- 6.2.5 Council officers informed the applicant on 21st September 2004 that the Council would be unlikely to accept anything less than 25% affordable housing as a lesser provision would simply not be approved by the Development Committee. An appeal for the non-determination of Scheme A was lodged on 25 November 2004.
- 6.2.6 The applicant submitted a Supporting Statement on Affordable Housing which included a revised copy of the 'GLA's Toolkit Appraisal' on the 20th September 2005, after their appeal for non-determination. The statement concludes that the scheme can broadly support the following permutations of affordable housing:
- 17.5% affordable housing of which 70% is social rent and 30% shared ownership; or
 - 17% affordable housing assuming 80% social rent and 20% shared ownership; or
 - 28% affordable housing of which all is shared ownership; or
 - 0% on site provision, but a cash contribution of up to £1,900,000 towards off site provision elsewhere in the Borough. However, this figure is calculated on the 2002 evaluation of the site and is liable to change following the updated version.
- 6.2.7 The applicant has advised that an additional more up-to-date version of the toolkit would be made available between 13 – 20 October 2005. At the time of writing this information was not available. The council engaged the expertise of consultants, Jones Lang Lasalle, to assist with the analysis of the inputs into the toolkit. The outcome of their assessment will be presented verbally at the Strategic Development Committee.
- 6.2.8 Whilst noting the above toolkit conclusions, it is evident that the proposal does not accord with the affordable housing targets to ensure the continued delivery of affordable housing in the Borough. It should also be noted that the proposal is contrary to the 50% affordable housing target as specified in the London Plan. The proposal is thus contrary to both Policies HSG3 of the UDP and HSG4 of the 1st Deposit Draft which seek to ensure that 35% of the gross floor space of the development is provided as affordable housing on site.

Mix of Units

- 6.2.9 Policy HSG7 of the UDP states that, housing developments are expected to provide a mix of unit sizes where appropriate including a substantial proportion of family dwellings between 3 and 6 bedrooms. Similarly Policy HSG8 of the 1st Deposit UDP requires that housing accommodation in new residential developments include those housing types and sizes to meet local needs. Finally, the Council's Housing Needs Survey shows that there is a significant need for larger family units (3 and 4 bedroom units) in the borough. In addition Policy HSG5 of the Council's 1st Deposit Draft UDP, states that affordable housing should include a mix of socially rented and intermediate market housing, with the split being 80:20.
- 6.2.10 The following is a summary of the proposed mix of units for Scheme A compared to the London Borough of Tower Hamlets Housing Needs Survey:

Unit Size	No of Units	Percentage (%)	Housing Needs Survey % requirements
Studio	25	26%	0%
1 Bedroom	39	41%	20%

2 Bedroom	22	23%	35%
3 Bedroom	9	10%	30%
4 Bedroom	0	0%	15%
Totals:	95	100%	100%

- 6.2.11 The applicant considers that it is inappropriate to provide a proportion of family sized flats because the site is located adjacent to a busy street and there are site constraints, which prevent the provision of substantial amenity space. However, officers do not agree with this statement. Indeed the lack of family sized housing is contrary to Council's policies.
- 6.2.12 Details of the mix or location of the proposed affordable housing units has not been provided. In these circumstances, the Council consider that the proposed development is contrary to Policies HSG7 of the UDP and Policies HSG8 and HSG5 of the 1st Deposit Draft UDP and Council's Housing Needs Survey, which seek to ensure that new residential development provides a mix of dwelling types and sizes to meet local needs and promote mixed use and balanced communities.

Internal Layout

- 6.2.13 Policy HSG13 of the UDP requires that all new developments have adequate provision of internal residential space in order to function effectively and should take account Council's supplementary guidance on residential space. The following is a summary of the units which do not comply with the Supplementary Planning Guidance (SPG) Note: Residential Space:

Unit	Proposed Size (sqm)	No. of bed/ people	Minimum SPG Requirement (sqm)
A.2.03	33	1/ 2	44.5
A.3.03	33	1/ 2	44.5
A.4.03	33	1/ 2	44.5
A.5.01	53	2/ 3	57
A.5.02	47	2/ 3	57
A.6.01	53	2/ 3	57
A.6.02	47	2/ 3	57

- 6.2.14 A total of 10 bedrooms, contained in Units A.B.01, B.B.02, C.B.01, C.B.02 and C.B.03, are proposed to be located in the basement. Light wells are proposed to provide light to some of the habitable rooms, such as bedrooms, located in the basement. However, a number of these bedrooms do not have windows, and/ or would receive very limited amounts of light because of the very narrow lightwell. Additionally, the living room of residential unit C.G.03 is proposed to be located on the ground floor on the corner of Flank Street with frontage to Dock Street. The applicant has failed to demonstrate how sufficient light and ventilation to this living area will be achieved and/ or the subsequent impacts on the privacy to the future occupiers of the ground floor residential unit.
- 6.2.15 Furthermore, a number of the room sizes are below the minimum room sizes specified in Council's SPG: Residential Space. For example, of the 95 residential units proposed, 28 fail the minimum SPG requirements for room sizes.
- 6.2.16 Overall, the proposed units by reason of their proposed internal layout would constitute an undesirable form of development, giving rise to a poor living environment for future occupiers. Specifically, this would result in poor outlook, lack of natural light and ventilation, and cramped bedroom sizes. The proposal is thus contrary to Policy DEV1 of the UDP, Policy ENV1 of the 1st Deposit Draft UDP and the Council's SPG: Residential Space, which seeks to protect the amenity of future residents.

6.3 Height, Density and Scale

Height

- 6.3.1 The Council's Urban Design and Conservation officer provided the following comments:

“The current applications demonstrate that previous comments and concerns of Council regarding the massing, materials and setbacks presented in past schemes have been largely addressed and that some attempt has been made to reinstate the architectural texture of streetscape to be lost as a result of the proposed demolition of existing buildings. Further information regarding the detailing, materials and colours are required and can be incorporated as conditions to the planning approval.

The immediate area of Dock Street is lined with a building mix of largely masonry construction ranging in height from 3 – 7 storeys. The roof heights in the street therefore remain below that of St Paul’s Church, a historic building with a grade 2 listed status. The streetscape is dominated by the spire of St Paul’s Church, despite the lift motor room tower of the adjacent ‘Look Ahead Housing Association’ hostel extending above the ridge line of the church.

Although the articulation of the street façade has benefited from the adoption of a ‘tower’ element on the Flank Street/ Dock Street corner, the design intent presented in the Planning application notes ‘The tower will act as the focal point in the streetscape and reflect the scale and subtlety of the spire of St Paul’s Church’, diminishing the significance of St Paul’s as a historic landmark in Dock Street and detrimentally altering the setting of the historic building.

Clause 5.58 of the Tower Hamlets UDP – ‘Unsympathetic development near to listed buildings can seriously detract from appearance or setting of the building thus reducing its contribution to the urban character of the Borough and diminishing its integrity as a building of special architectural or historic interest’.

The Conservation Officer feels that Proposal A (13 storey tower option):

- *does not address the prevailing urban character of the area, the tower proposed being significantly higher than the predominant roof height in Dock Street;*
- *detrimentally affects the setting of St Paul’s Church;*
- *significantly alters the character of the street by replacing the existing dominant architectural feature of St Paul’s Church spire with a 13 storey commercial tower block.*

The applicant has not successfully demonstrated that the presence of other high buildings (over 7 storeys) located in adjacent streets have a special character in the immediate area.

The Conservation Officer therefore recommends against the approval of Scheme A (13 storey tower block).”

6.3.2 The application was also referred to English Heritage. English Heritage provided the following comments (in part):

“The grade II listed St Paul in the East church and vicarage are located directly opposite the site on Dock Street. The principle concern is therefore the impact of the proposal on the setting of the adjacent listed buildings and surrounding townscape.

Dock Street and its immediate surroundings are characterised by a fairly consistent pattern of four to five storey development, much of which is surviving and adapted nineteenth century warehousing or light industrial building types, and the Peabody Trust housing scheme immediately behind the site. Within the spire of St Paul’s church forms the obvious original landmark. The adjacent, modern housing association building on the east side of the street (approximately 7 storeys) provides one of the few aberrations from this original pattern in the immediate vicinity.

There are of course examples of significantly taller buildings nearby, notably to the north and west within the City and to the south on East Smithfield/ The Highway. However I would consider these to be clearly separated from the immediate context of this site by the demarcation lines of the railway viaduct and the surrounding principal roads.

...I consider the heights of...the elements of Scheme A...are excessive in this context. The role of the spire of St Paul's as the original focal point of the street within an established cluster of lower buildings will be seriously and detrimentally challenged by the proposed development.

I would therefore recommend that...the scheme is amended to delete the tower element of the scheme and reduce the height generally, retaining a scale and language more closely related to the original prevailing four to five storey form of the street. A deferential relationship allowing the spire of St Paul's to remain the focal point of the street is of critical importance."

6.3.3 It is considered that the heights of all elements of the scheme are excessive in this context. The proposal:

- would seriously and detrimentally challenge the spire of St Paul's Church (Ecclesiastical Grade C Listed Building); and
- would detrimentally effect the setting of St Paul's Church.
- does not address the prevailing urban character of the area, the tower being significantly higher than the predominant roof height in Dock Street;
- would significantly alter the character of the street by replacing the existing dominant architectural feature of St Paul's Church spire with a 13 storey tower;

As such, the proposal is contrary to Policies DEV1 and DEV39 of the UDP and UD7 and UD17 of the 1st Deposit Draft UDP.

Density and Scale

6.3.4 Policy HSG 9 states that new housing developments should not normally exceed a guideline of about 247 habitable rooms per hectare. Higher densities may be acceptable where, (1) *The development will provide affordable housing... or be predominantly for non-family housing...or (4) It can be demonstrated that the proposal meets all the other standards for new dwellings in the plan and does not conflict with the Council's policies for the environment.*

6.3.5 Policy HSG9 of the 1st Deposit Draft specifies that the highest development densities, consistent with other Plan policies, will be sought throughout the Borough. The supporting text states that, when considering density, the Council deems it necessary to assess each proposal according to the nature and location of the site, the character of the area, the quality of the environment and type of housing proposed.

6.3.6 The 1st Deposit Draft specifies that for sites in an Area Action Framework, the density range for flat development is 650 –1100 habitable rooms per hectare or 240 – 435 units per hectare. The proposed density is **1963** habitable rooms per hectare or **872** units per hectare. Therefore the proposed density is over 50% in excess of the highest density range specified in the 1st Deposit Draft.

6.3.7 Although the density level is well above the density range, this does not in itself justify a reason for refusal. Typically, an overdeveloped scheme could result in the following problems:

- Loss of light to adjacent residents;
- Negative impact on microclimate;
- Increased sense of enclosure to adjacent residents;
- Loss of privacy and overlooking to adjacent residents;
- Poor standard of accommodation for prospective occupiers, in terms of poor outlook, lack of natural light and ventilation, poor internal layout, and cramped bedroom sizes; and
- Insufficient on site amenity space.

This scheme exhibits all the classic symptoms of an overdeveloped scheme.

6.3.8 Overall, the proposal represents an undesirable form of overdevelopment of the site, by reason of its excessive density. The proposal is thus contrary to Policy HSG9 of the UDP

and HSG9 of the 1st Deposit Draft, which seek to ensure that high densities are only supported where consistent with other Plan policies.

6.4 Microclimate

Sunlight/ Daylight

6.4.1 The Council's Environmental Health Officer considered the sunlight and daylight report and the supplementary report (which considered the impact on the property at 11 Dock Street) submitted by the applicant. The reports are considered to be unsatisfactory and will result in an unacceptable impact on local properties and residents. The information submitted is considered deficient as follows:

1. The report does not identify the internal impacts to residents within the development, i.e. the impact of Block A on Block B, and the impact of Block B on Block C;
2. The report does not address the cumulative impact of:
 - The development on 9 Dock Street (Look Ahead Housing Association, 7 storeys);
 - The development on 11 Dock Street;
 - Block A, B and C on the adjacent properties, i.e. 12 – 14 Dock Street (which is a 4 storey residential building); and
 - Proposed Block C (7 storeys) on Block A of the Peabody Housing Estate (5 storeys).
3. A shadow analysis or sunpath analysis is required to determine how many hours of sunlight to sunset would be available to the Peabody Housing Estate. The analysis should include all 4 equinoxes, i.e. 21st March, 21st June, 21st September and 21st December; and
4. Further analysis is required for 11 Dock Street (Grade II Listed Building – Vicarage, currently used as a townhouse) and should include average daylight factor (ADF), vertical sky component (VSC) and sunpath analysis.

6.4.2 The Environmental Health officer determined that based on the assessment submitted, the development will result in an unacceptable adverse impact in terms of sunlight/ daylight on Blocks B and C of the Peabody Housing Estate, including ground through to fourth floor.

6.4.3 Insufficient information has been submitted to fully ascertain the impact of the proposed development on the sunlight/ daylight conditions of the development and the surrounding properties. In the absence of such a detailed assessment, an informed judgement of the impact of the proposal cannot be made. In addition, the development will result in an unacceptable adverse impact on the amount of light received by Blocks B and C of the Peabody Housing Estate, including ground through to fourth floor. The proposal is thus contrary to Policy DEV5 of the Tower Hamlets UDP (adopted 1998) and Policy UD7 of the 1st Draft Deposit (May 2004) of the Tower Hamlets Unitary Development Plan, which seek to protect the amenity of existing residents in terms of the standard and amount of light they receive.

Wind Assessment

6.4.4 The Council's Environmental Health Officer considered the wind assessment report submitted by the applicant. The report submitted is considered to be unsatisfactory, as the methodology and assessment submitted is not sufficiently detailed. The information submitted is considered deficient as follows:

1. The wind assessment report is desk based. This is unacceptable. Wind sensing monitors are required to be set up on site;
2. The report has not demonstrated the windiness of the new development in relation to the existing development to enable the Council to make an informed judgement. The assessment is required to be carried out using sensors to demonstrate the existing development, proposed development, and proposed development with mitigation. This information is required to support the claim that Dock Street is suitable for 'standing' and enable the Council to make an informed judgement;
3. The report has not addressed the cumulative impact of the proposal on all neighbouring properties;

4. The junction of Flank Street and Dock Street is no longer acceptable for 'standing' as a result of the proposed development. The Council would accept conditions for 'walking'. However, this has not been demonstrated; and
5. The report has not demonstrated the change in conditions between the existing and proposed development. This information is required to enable the Council to make an informed judgement of the impact of the proposed development.

6.4.5 Insufficient information has been submitted to fully ascertain the impact of the proposed development with regard to wind. In the absence of a detailed assessment, an informed judgement of the impact cannot be made. The proposal could be detrimental to the adjacent residents in terms of wind impact, as such, the proposal is thus contrary to Policy DEV5 of the Tower Hamlets UDP (adopted 1998) and Policy UD7 of the 1st Draft Deposit (May 2004) of the Tower Hamlets Unitary Development Plan, which seeks to mitigate the impact of the buildings on the immediate surroundings.

6.5 Privacy and Sense of Enclosure

6.5.1 Policy DEV2 of the UDP and ENV1 of the 1st Deposit Draft, states that a distance of about 18m between habitable rooms and adjacent windows reduces the inter-visibility to a degree acceptable to most people.

6.5.2 The following is a summary of the distances between the proposed development and the development to the eastern boundary of the site, i.e. Peabody Housing Estate:

- The distance between the windows of proposed Block A and B is a minimum of 6m on the western boundary of the Peabody Housing Estate; and
- The distance between the most southern corner of proposed Block C and Block A of the Peabody Housing Estate is 16m.

6.5.3 Although on site inspections indicate that the proposed windows may in fact be offset to the existing windows of the Peabody Housing Estate, this has not been demonstrated.

6.5.4 Furthermore, the living room of the ground floor residential unit, (i.e. Unit C.G.03), is considered to create unacceptable living conditions to the detriment of future occupiers in terms of creating an unacceptable loss of privacy to the detriment of future occupiers.

6.5.5 The proposal would result in an unacceptable degree of overlooking, loss of privacy and increased sense of enclosure to the detriment of occupiers and the amenity of adjoining residents by reason of its bulk, height and proximity to the opposite habitable rooms, thus causing a material loss of amenity. The proposal is thus contrary to Policy DEV2 of the UDP and ENV1 of the 1st Deposit Draft, which seek to ensure that developments do not harm the amenity of occupiers or neighbours.

6.6 Open Space

6.6.1 Policy HSG16 of the UDP and HSG12 of the 1st Deposit Draft UDP requires that all new housing developments include adequate provision of amenity space. Council's SPG for Residential Space provides numerical requirements as follows:

- 50sqm of private space per family unit;
- 50sqm plus an additional 5sqm per 5 non-family units; and
- 3sqm of child play space per child bed space.

6.6.2 The proposal generates the following open space requirements:

- 9 family units (a total of 9 x 3 bedroom provided) (9 x 50 = 450sqm);
- 86 non-family units (50 + 86 = 136sqm); and
- 18 child bedspaces (assume 2 child bed spaces per family unit) (18 x 3 = 54sqm).

6.6.3 This equates to a total requirement of 640sqm. The proposal provides for approximately 165sqm at ground floor level, behind Blocks A, B and C and within the ground floor courtyard of Block C. A number of units have balconies of approximately 1sqm, this equates to an additional 12sqm of amenity space. Thus the total provision of on site amenity space

is approximately 177sqm. A separate child play space is not provided.

- 6.6.4 The proposal is thus contrary to Policy HSG16 of the UDP and HSG12 of the 1st Deposit Draft, which seeks to ensure that all new housing development include an adequate provision of amenity space, in a Borough that has a significant deficit of open space in this area and overall.

6.7 Access and Transport

- 6.7.1 The site is approximately 500 metres from Tower Gateway DLR Station and 600 metres from Tower Hill Station. Fenchurch Station (main line rail) is within 1km of the site. In addition, a number of bus services are within approximately 250m of the site. Consequently, the site has a Public Transport Accessibility Level (PTAL) of 6b.

- 6.7.2 Pedestrian access to the site can be gained from Dock Street and Flank Street.

Parking

- 6.7.3 The application does not propose to include any on site or off site car parking spaces. This is in accordance with the requirements of the London Plan and thus satisfies Policy TRN11 and TRN of the 1st Deposit UDP that seeks to minimise on and off street car parking and requires developments to be bicycle friendly.

- 6.7.4 The scheme generates the requirement for a total of 19 cycle spaces for the residential component and a rate of 2% of the number of employees for commercial component. A total of 32sqm is designated in the basement for refuse/ cycle storage.

Cycle Network and Parking

- 6.7.5 A cycle route is located on the Dock Street frontage of the site and connects with the public transport connections within close proximity to the site.

- 6.7.6 The Council's Highways Department has reviewed the transport assessment and there are no objections in principle.

7. SUMMARY

- 7.1 Had the Council been empowered to make a decision on the application, it would have refused planning permission for the following reasons:
1. **Land Use:** the application did not include evidence of marketing with respect to the loss of employment floor space to justify the loss of class "B1" floor space in this location. The proposal could potentially result in an unacceptable loss of employment floor space.
 2. **Affordable Housing:** the proposed development fails to provide an acceptable level of affordable housing.
 3. **Affordable Housing Ratio and Mix:** the proposed development fails to provide an appropriate affordable housing ratio and mix.
 4. **Mix of Residential Units:** the proposed mix of the residential units does not comply with Council's Housing Needs survey or the Governments sustainable communities agenda.
 5. **Negative Amenity Impacts:** the proposed development would result in a poor living environment for future occupiers. A number of units are below Council's minimum residential unit size and room size standard requirements. In particular, the proposed habitable rooms to be contained in the basement have a poor outlook, a lack of natural light and ventilation and cramped bedroom sizes.
 6. **Excessive Height:** the heights of all elements of the scheme are excessive in this context. The proposal:

- would seriously and detrimentally challenge the spire of St Paul's Church (Ecclesiastical Grade C Listed Building); and
- would detrimentally effect the setting of St Paul's Church.
- does not address the prevailing urban character of the area, the tower being significantly higher than the predominant roof height in Dock Street; and
- would significantly alter the character of the street by replacing the existing dominant architectural feature of St Paul's Church spire with a 13 storey tower.

7. **Overdevelopment:** the proposal represents an undesirable form of overdevelopment by reason of its excessive density, generally cramped site layout. Resulting in a poor living environment for future occupiers and negative impacts on adjacent occupiers, including:

- poor outlook;
- lack of natural light and ventilation;
- cramped unit and bedroom sizes;
- lack of onsite amenity space;
- loss of light to adjacent residents;
- increased sense of enclosure to adjacent residents;
- loss of privacy/ overlooking to adjacent residents; and
- generally cramped site layout.

8. **Negative Impacts on Microclimate:** the application did not include sufficient information to enable the Council to make an informed assessment of the impact of the proposed development on micro-climate (i.e. sunlight/ daylight and wind assessments). In addition, based on the assessment submitted, the development would result in unacceptable adverse impact in terms of sunlight/ daylight on Blocks B and C of the Peabody Housing Estate, including the ground through to the fourth floor.

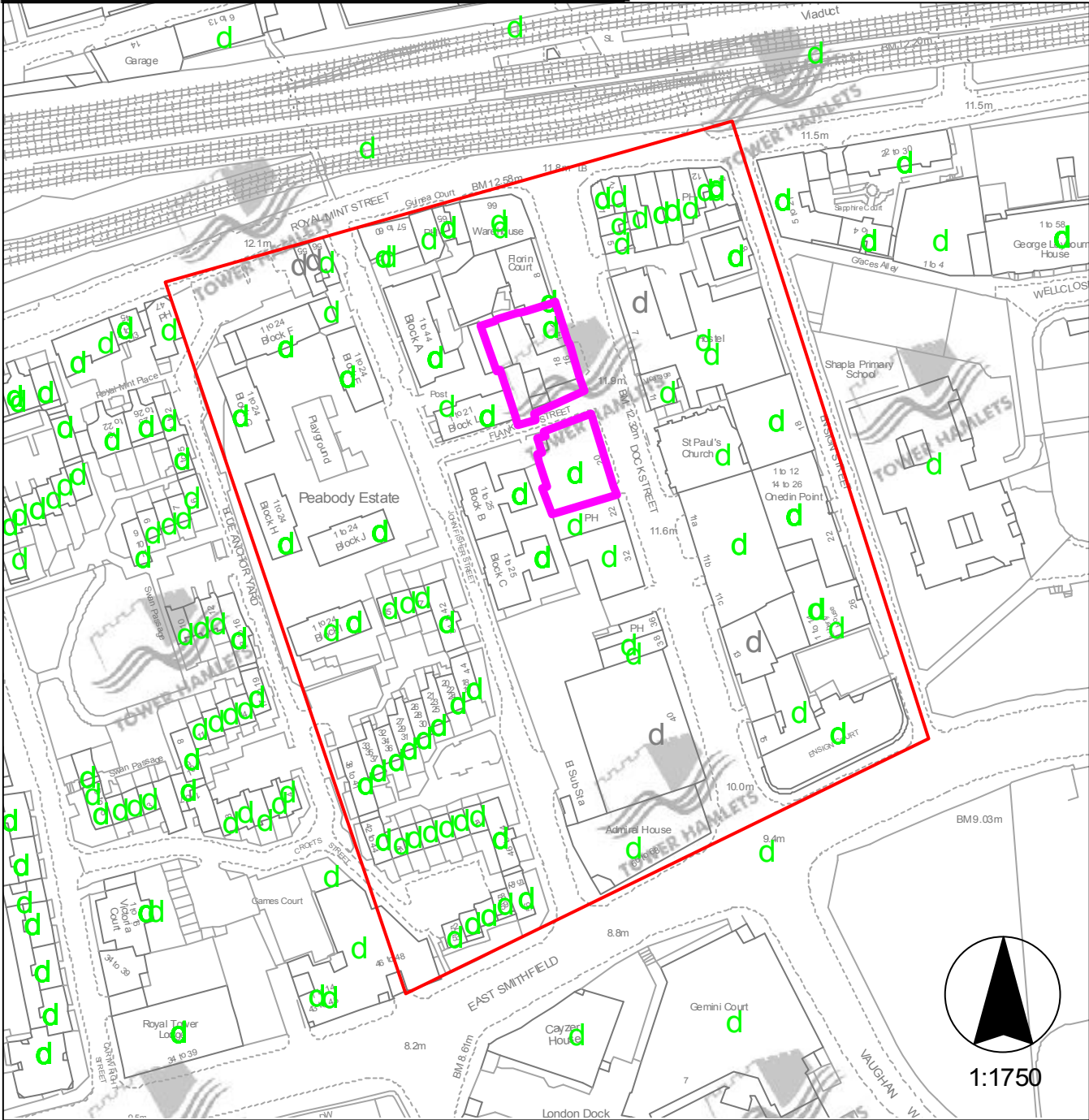
9. **Loss of Privacy/ Overlooking and Increased Sense of Enclosure:** The proposal by reason of its height, bulk and proximity to the opposite habitable rooms (being, the ground to fourth floors of Block A and B of the Peabody Housing Estate) would result in:

- an unacceptable loss of privacy/ overlooking to adjacent residents; and
- an increased sense of enclosure to the detriment of the occupiers and adjoining residents.

10. **Insufficient Amenity Space:** the proposal provides an inadequate amount of private open space for use by individual dwellings to the detriment of the occupiers of the proposed development.

7.2 The proposal is thus contrary to the policies and objectives of the Council and the objectives of the London Plan. It is thus recommended that the application be refused on the grounds referred to above.

Site Map



Legend

- Planning Application Site Boundary
- Consultation Area
- d Land Parcel Address

This Site Map displays the Planning Application Site Boundary and the neighbouring Occupiers / Owners who were consulted as part of the Planning Application process. The Site Map was reproduced from the Ordnance Survey mapping with the permission of Her Majesty's Stationery Office © Crown Copyright. London Borough of Tower Hamlets LA086568