STRATEGIC DEVELOPMENT COMMITTEE

28th August 2024

Report of the Corporate Director of Housing and Regeneration

Classification: Unrestricted

Application for Planning Permission *click here for case file*

Reference	PA/23/02375
Site	Former Westferry Printworks, 235 Westferry Road, London.
Ward	Canary Wharf
Proposal	Comprehensive and phased mixed-use redevelopment comprising 1,358 residential units (Class C3), secondary school (Class F), commercial, business and services E(a)-E(g)(i), community uses (Class F), Police Base (Sui Generis) car and cycle basement parking, associated landscaping, new public realm and all other necessary enabling works. The application is accompanied by an Environmental Statement.
Summary Recommendation	Grant planning permission subject to conditions and planning obligations to be secured in a S106 legal agreement.
Applicant	Westferry Development Ltd
Architect/agent	PLP Architecture/DP9
Case Officer	Nelupa Malik
Key dates	- Application registered as valid on 16/01/2024 - Letter sent to neighbours on 19/01/2024 - Press notice published 25/01/2024 - EIA Reg 25 consultation 22/05/2024 - EIA Reg 25 press notice published 30/05/2024 - EIA Reg 25 consultation 10/06/2024 - EIA Reg 25 consultation press notice published 13/06/2024

EXECUTIVE SUMMARY

The application site comprises the vacant former Westferry Printworks site which is bounded by the Millwall and West India Docks from south to north east with the southern boundary of the site running along the northern boundary of Millwall Outer Dock. The site is bounded by Westferry Road (A1206) to the west, Greenwich View Place Business Park to the east and to the north by Tiller Road which provides an east-west connection between Mellish Street and Westferry Road. To the south of Tiller Road and immediately north of the application site are residential properties along Claire Place, Starboard Way and Omega Close. The application site measures 6.15 hectares.

The application proposes the comprehensive redevelopment of the site and seeks planning permission to deliver 1358 residential units, a 1200 pupil capacity secondary school and 6164.1sqm of commercial floorspace (excluding the school). There will be 12 building plots within the masterplan (excluding the school). The school component of the scheme will comprise a main school building and a separate sports block. The school grounds will also accommodate 2 x MUGAs (Multi Use Games Area) and a sports pitch. The scheme will be a detailed 4-phased development that is expected to have a construction programme of approximately 7 years commencing from 2024, subject to planning permission.

The application has undergone the statutory public consultation exercise and two rounds of public consultations under Regulation 25 of the Environmental Impact Assessment Regulations 2017. In total, 1025 representations have been received of which 968 representations submitted are in favour of the proposals and 51 representations submitted are against the proposals.

In land use terms, the site falls within the Isle of Dogs and South Poplar Opportunity Area where residential use is promoted. The site has a designated site allocation under the Local Plan which identifies housing to be an appropriate land use. The site allocation also seeks the provision of a secondary school to be delivered on the site. The provision of new housing will contribute to the broader regeneration of this Opportunity Area and assist in the delivery of new housing and as such the residential-led mixed use development is considered to be acceptable in principle.

The application proposes to provide 979 homes in the Market tenure, 120 homes in the Intermediate tenure and 259 homes in the Affordable Rent tenure. There would be a range of unit sizes and occupancy levels across all three tenures and the overall unit mix will result in departures from the preferred unit mix as set out in the Local Plan. However, the proposal seeks to maximise larger family housing in the Affordable Rent tenure.

The scheme proposes 35% affordable housing based on habitable rooms under the London Plan Fast Track route thus no Financial Viability Assessment is required. . The tenure split for the affordable housing will be 70%:30% in favour of Affordable Rent to Intermediate and would therefore be policy compliant.

The scheme would meet Development Plan standards for internal floorspace, communal amenity space and private amenity space. The scheme will also deliver policy-compliant levels of wheelchair accessible or adaptable housing designed to Part M4(3) standards equating to 10%. The remaining 90% of units will be designed to Part M4(2) standards in accordance with local and national planning policy requirements.

The scheme does not provide policy-compliant levels of children's play space, proposing 4,759sqm against a policy target of 5,538sqm. The Applicant considers that the scheme is over-providing children's play provision as the scheme includes the MUGAs and the sports pitch (equating to 1,997sqm) which it claims form part of the play provision. Officers do not accept that these area can be included for reasons detailed in the main body of this report. On this basis, the scheme is considered to fall short of the minimum required play provision by 779sqm. It is recognised, however, that the MUGAs and sports pitch provide wider regeneration benefits to the scheme. Whilst the provision of play space falls short, Officers consider that the play provision proposed across the masterplan (not including the school site) will create stimulating environments and would be accessible by all members of the community. On balance, Officers find the provision of play space to be acceptable.

The proposal comprises 12 tall buildings (excluding the school) across the masterplan however the site falls within the Millwall Inner Dock Tall Building Zone (TBZ) and is considered to accord with the design principles of this TBZ by ensuring that building heights step down from the Canary Wharf cluster of buildings and from Marsh Wall.

The height, scale and massing of the development will result in material reductions to daylight and sunlight received to neighbouring buildings. However, the site falls within an Opportunity Area, and the densities proposed would meet the National Planning Policy Framework objective of significantly boosting the supply of housing and optimising housing delivery. As a consequence, where higher density developments are proposed, reductions in daylight and sunlight to neighbouring properties would normally be expected and are balanced against the wider regeneration benefits arising from a scheme.

The site does not fall within a Conservation Area nor does it include any listed buildings. Officers consider that the scheme would result in less than substantial harm to the Royal Naval College and by association to the Maritime Greenwich World Heritage Site, Tower Bridge and the former St Paul's Presbyterian Church. However, this harm is considered to be outweighed by the public benefits of the proposal as detailed within the main body of this report.

The scheme would deliver good-quality architecture, public realm and landscaping and biodiversity net gain which is supported and welcomed by Officers. The scheme would also deliver a site-wide on-site reduction in carbon dioxide emissions of 71%. The school will achieve a BREEAM rating of 'Excellent' whilst the remaining non-residential components of the scheme will achieve a BREEAM rating of 'Very Good'.

The scheme will deliver strategic infrastructure in the form of 2.08 hectares of public open space (including areas designated for play within public open space). This would substantially exceed the site allocation requirement of 1 hectare for this site.

The site has a moderate Public Transport Accessibility Level (PTAL) of 3 and the proposal would be 'car free' with the exception of 146 accessible car parking space. This will comprise 136 spaces (equating to 10%) allocated to the residential component of the development, 2 spaces allocated to the school and 8 spaces allocated to the other non-residential components of the development. The 'car free' nature of the development is supported. Cycle parking will also be provided in accordance with London Plan requirements.

The application has been accompanied by an Environmental Statement (ES), which has been reviewed by Council Officers in conjunction with Temple and has been found to be adequate.

Overall, the application has been assessed against the development plan comprising of the Council's adopted policies contained within the London Borough of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (January 2020) and the London Plan 2021. The application has also been assessed against the National Planning Policy Framework and all other relevant material considerations.

There are aspects of the proposals that would not comply with detailed policies in the development plan. However, the proposal complies with the development plan as a whole. There are considerable benefits arising from a comprehensive approach to regeneration, housing delivery, improvements to connectivity and place-making, Officers recommend that planning permission should be granted subject to conditions, planning obligations and any direction by the Mayor of London.

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

Planning Applications Site Map PA/23/02375

This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process

TOWER HAMLETS

London Borough of Tower Hamlets

Scale : 50m grid squares

Date: 28th August 2024

1. SITE AND SURROUNDINGS

1.1 The application site measures 6.15 hectares and formerly comprised the Westferry Printworks site within the Isle of Dogs. The former printworks became redundant in 2012 and the building that previously occupied the site has since been demolished and the site cleared. The site is irregular in shape and located to the north west of Millwall and West India Docks which is designated as a Site of Importance for Nature Conservation (SINC). The southern boundary of the site runs along the northern boundary of Millwall Outer Dock whereby a dockside towpath extends along the edge of Millwall Outer and Inner Docks. The site is bounded by Westferry Road (A1206) to the west, Greenwich View Place Business Park to the east and to the north by Tiller Road which provides an east-west connection between Mellish Street and Westferry Road.

1.2 Greenwich View Place Business Park is occupied by data centres and business uses with buildings rising to 10-storeys on the corner of Millwall Outer and Inner Docks. To the north of the site lies the Tiller Leisure Centre and residential properties ranging in height from 2 to 3-storeys at Claire Place and Omega Close. Directly south of the leisure centre lies the Barkantine Energy Centre. Starboard Way which is also located to the north of the site accommodates flatted developments ranging between 4 to 10-storeys. To the north west at the western end of Mellish Street are 21-storey 1960s constructed blocks of flats comprising the Barkantine Estate. Further north is a number of tall building developments along Marsh Wall with One Canada Square and the associated Canary Wharf cluster of tall buildings further beyond.

Figure 1: Aerial view of the application site

1.3 The Docklands Sailing and Watersports Centre (DSWC) occupies 235a Westferry Road immediately south of the site and uses Millwall Dock for leisure purposes. Opposite the site and on the south side of Millwall Outer Dock are 4-storey 1980's low-rise flatted residential blocks along Arden Crescent. The north western portion of the site abuts the termination of Millwall Dock Road. To the west of Millwall Dock Road lies a 4 storey commercial building which occupies the corner of Millwall Dock Road and Tiller Road and directly west of this and abutting the far north western corner of the application site lies Caravel Close, a 3-4 storey residential flatted development.

1.4 The site has two points of access: the primary access is from Westferry Road at the western end of the site with a secondary access point at the bottom of Millharbour at the eastern end of the site. On the opposite side of Westferry Road and directly facing the western boundary of the site lies Arnhem Wharf Primary School.

1.5 The site does not lie within a Conservation Area, nor are there any listed buildings within the site boundary. Conservation Areas within the Isle of Dogs but not within the immediate proximity of the site include the Chapel House and Island Gardens Conservation Areas to the south east, the Coldharbour Conservation Area near South Dock to the north east and further north west and nearer to the Limehouse Basin lie the West India Dock and Narrow Street Conservation Areas. The Chapel House Conservation Area is closest in terms of proximity to the site and is sited some 450 metres south of Millwall Outer Dock.

1.6 The closest listed building to the site is the Grade II former St Paul's Presbyterian Church on Westferry Road which is sited 260 metres to the south.

1.7 The site has a PTAL (Public Transport Accessibility Level) of 3 on a scale of 0-6b where 0 is the worst. The site is some 0.4 miles from Crossharbour DLR Station which is north east of the site via Glengall Bridge. Island Gardens DLR Station is between approximately 1-1.3 miles away to the south of the site whilst Canary Wharf Underground, Elizabeth Line and DLR stations and Heron Quays DLR Station are between approximately 1-1.2 miles north of the site.

1.8 The site has the following key designations:

- Site Allocation 4.12 Westferry Printworks[1]
- Isle of Dogs and South Poplar Sub Area
- Isle of Dogs Neighbourhood Planning Area
- Isle of Dogs and South Poplar Opportunity Area
- Millwall Inner Dock Cluster Tall Building Zone
- Archaeological Priority Area Tier 3
- New Green Grid Buffer Zone
- Area of Deficiency of Access to Nature
- Flood Zone 3

2. PROPOSAL

Background

2.1 The application site has planning permission which was granted in 2016 (under planning application reference PA/15/02216) for the comprehensive redevelopment of the site to provide a mixed-use scheme including buildings ranging between 4-30 storeys in height comprising: a secondary school, 722 residential units, retail uses, flexible restaurant and café and drinking establishment uses, flexible office, financial and professional services uses, community uses, car and cycle basement parking, associated landscaping, new public realm and other necessary enabling works. This application was approved by the Mayor of London following the then Mayor exercising his power to become the determining authority for the planning application. This planning permission (the "extant" planning permission/consent) provides 20% affordable housing based on habitable rooms (140 units). The extant planning permission has been implemented by virtue of the excavation of the outline of the large basement. In addition to this, some site-wide infrastructure has been installed. The consented masterplan layout and its southern elevations can be seen in the images below.

[1] It should be noted that the site, whilst not within Millharbour South Site Allocation (Site Allocation 4.7), abuts that land allocation.

Figure 2: Extant planning permission masterplan

Figure 3: Consented scheme South Elevations

2.2 In 2018, the Applicant submitted a revised planning application that sought to amend the extant scheme by increasing building heights to provide 1,524 residential units. The masterplan principles generally remained as per the extant planning permission. However, in addition to the increased height of buildings, this amended scheme also sought to incorporate an additional tower referred to in this planning application as tower 5/T5. Following a failure to determine the application within statutory time limits, on 26 March 2019, a non-determination appeal was submitted to the Planning Inspectorate (PINS) by the Applicant. The procedure agreed for the appeal was a public inquiry. In April 2019, PINS advised that the Secretary of State for Housing, Communities and Local Government (the Secretary of State) had directed that he would be determining the appeal himself.

2.3 The public inquiry was held in August and September 2019, following which, in November 2019, the Inspector recommended that the appeal be dismissed. On 14 January 2020, the Secretary of State allowed the appeal, contrary to the Inspector's recommendation.

2.4 The Council challenged the Secretary of State's decision by judicial review. The Secretary of State conceded the claim before it proceeded to a hearing, with the High Court approving the agreement reached between the Council and the Secretary of State that the grant of planning

permission should be quashed and the Applicant's planning appeal redetermined. Following a re-opened public inquiry in May 2021, the appeal was dismissed on 18 November 2021. The appeal was dismissed on the following grounds (in summary):

- The effect of the scale, height and massing of the proposed development on the character and appearance of the surrounding area.
- The effect of the proposal on the settings of the Maritime Greenwich World Heritage Site and the Grade I listed Tower Bridge.
- Mix of tenure types and unit sizes: the scheme would not make adequate provision for family housing or maximise the provision of family homes in accordance with site allocation 4.12 (Westferry Printworks).
- The proposal would not make adequate provision for the viability reviews that are necessary to ensure that affordable housing is maximised.

Proposal

2.5 This application seeks planning permission for the comprehensive and phased mixed-use redevelopment of the site to provide 1,358 residential units (Class C3), a secondary school (Class F), commercial, business and services (Class E(a)-E(g)(i)), community uses (Class F), a police base (sui generis), car and cycle basement parking, associated landscaping, new public realm and other necessary enabling works. The proposed masterplan (ground level) can be seen in the image below.

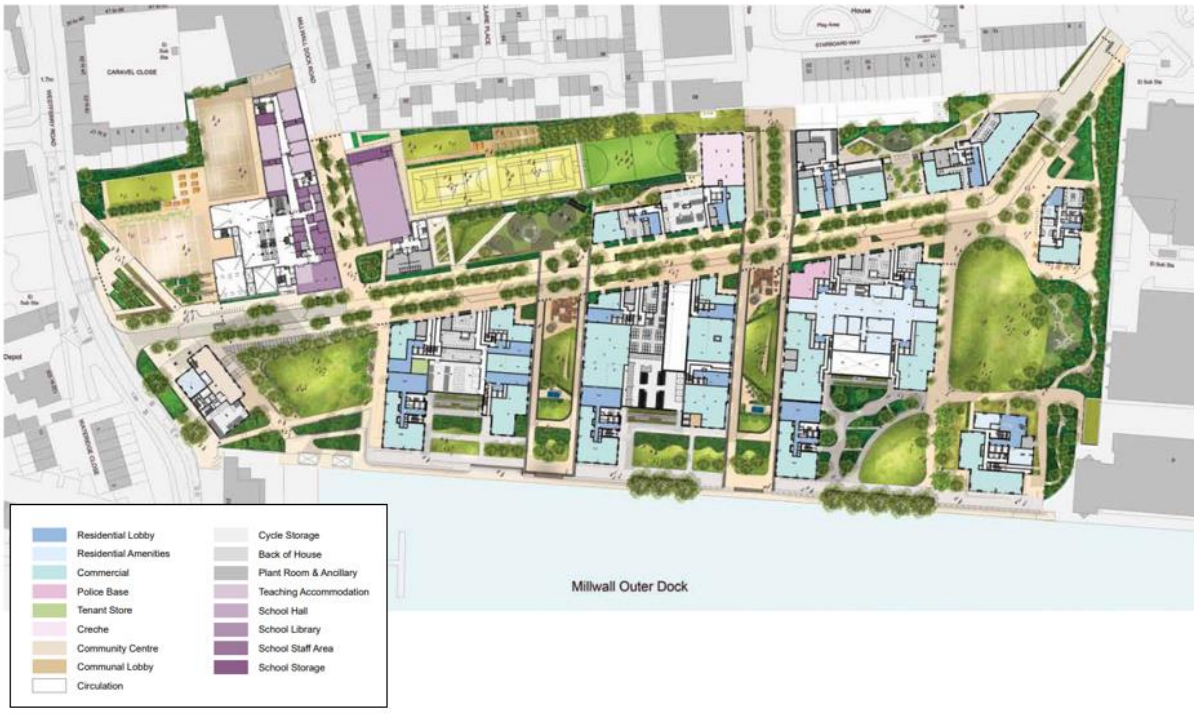

Figure 4: Proposed masterplan

2.6 The scheme proposes the following quantum of gross internal floorspace (GIA):

Land Use	Quantum (GIA sqm)
Residential (Use Class C3)	165,951.1 sqm
Secondary School (Use Class F)	10,532 sqm
Community Use (Use Class F2)	220.3 sqm
Flexible Commercial Business + Services (Use Class E)	
Classes E(a) to E(c)	3,921.7 sqm
Class E(b)	1,432.7 sqm
Class E(f)	349.5 sqm
Class E(g)(i)	76.5 sqm
Police Base (Sui Generis)	163.4 sqm

Table 1: Proposed quantum of floorspace in GIA

2.7 The proposed masterplan adopts the key layout principles established under the extant planning permission. The proposal comprises two school buildings and twelve residential buildings with areas of public open space and communal amenity space at ground level. Buildings within the proposed masterplan are identified as gateway buildings E1 and W1, waterfront tower buildings T1-T4, courtyard buildings C1-C3 and northern buildings N1-N3. Building E1 is a new building introduced to the masterplan and the northern buildings comprised 2 buildings under the extant planning permission.

Figure 5: CGI of proposed development looking north

2.8 The gateway buildings mark the western and eastern access points to the masterplan (Westferry Road and Millharbour). The waterfront towers are situated along the southern edge of the masterplan facing the dock front. The courtyard buildings sit just behind the waterfront towers and physically connect to T1-T3 at ground floor level. The northern buildings are located along the northern part of the masterplan. The school is proposed to be located in the northwestern corner of the site and includes a main school building fronting Westferry Road and a separate sports block with associated playing fields, 2 x MUGAs (Multi Use Games Area) and a football pitch. The school will have the capacity to accommodate 1200 children (900 aged between 11-16 years and 300 post 16 years). The layouts of the buildings within the masterplan can be seen in the image below.

Figure 6: Layout and names of buildings within the masterplan

2.9 The main vehicular and pedestrian access to the site would be via Westferry Road with a secondary access at Millharbour. As per the extant planning permission, an east-west route identified as the 'Boulevard' runs through the site whereby the gateway buildings, courtyard buildings and waterfront towers are positioned to its south and the northern buildings positioned north of the Boulevard. The towers increase in height from west to east with T4 identified as being the 'landmark' building within the masterplan. Two north-south pedestrian routes identified as the Eastern and Western Spines connect the Boulevard to the towpath which will be upgraded and altered as part of the proposals. The eastern and western spines also provide residential entrances to the courtyard and towers (T1-T3). No vehicular access is proposed via the north-site routes. A large basement will be constructed below towers T1-T4 and the courtyard buildings C1-C3 which will accommodate car and cycle parking, plant rooms and other back of house areas. The scheme proposes to provide 146 accessible car parking spaces, the majority of which would be provided in the large basement. The basement is accessed from the Boulevard and the access route sits in between the T2/C2 and T3/C3 cluster of buildings. A much smaller semi-basement/undercroft is proposed beneath the building plots of buildings N1-N2 which will provide 12 of the blue badge spaces.

Figure 7: Key routes within the masterplan.

2.10 Buildings across the masterplan will range between 4-31 storeys with buildings generally increasing in height from north to south and west to east. The tallest residential building within the masterplan will be tower T4 reaching a maximum height of 31 storeys whilst buildings N1 and N2 will have the lowest height range between 4-10 storeys. The school building will reach a maximum height of 5 storeys. A replacement substation is also proposed in the far southeastern corner of the site that measures 6.30m x 18.84m and 4.30m in height. The distribution of height (in storeys) across the masterplan can be seen in the image below. A detailed assessment of height, scale and massing is provided in the main body of this report.

Figure 8: Distribution of height (in storeys) across the masterplan

2.11 The remainder of the site comprises areas of public realm, public open space, children's play and communal amenity spaces. The two gateway buildings (E1 and W1) are positioned at the main access points which lead to areas of large public open space (identified as Park East

and Dockside Gardens respectively). To the west, the footpath along Westferry Road leads to a new plaza (Westferry Plaza) outside of the new secondary school.

2.12 On the northern side of the Boulevard there are two landscaped areas proposed. The first area, Boulevard Green, lies directly west of building N3 and south of the school playing fields and is a multifunctional green space incorporating MUGA areas. The second area, between buildings N1 and N2, is a landscaped area of communal amenity space and play space. Further landscaping, areas of public realm and children's play space are proposed to the south of the Boulevard in the Eastern and Western spines. To the south of the Boulevard are Promenade Place and the Promenade.

2.13 To assist in activating the different areas of public open space and public realm a variety of commercial and community uses are proposed at ground level to maximise active frontage. Commercial uses include the provision of a community centre on the upper ground floor of building W1 and a crèche proposed on the ground floor of building N3. A Police Base is also proposed within the masterplan however this is not a public-facing use whereby members of the public could, for example, report a crime.

2.14 Full details of the proposed development and the evolution of the detailed design of the proposal are described within the Applicant's Design and Access Statement. The assessment of design and appearance is provided in the main body of this report.

Figure 9: CGI of relationship between waterfront towers and courtyard buildings and architectural details.

Phasing

2.15 The proposed development will be constructed in four phases as identified in the phasing plan below.

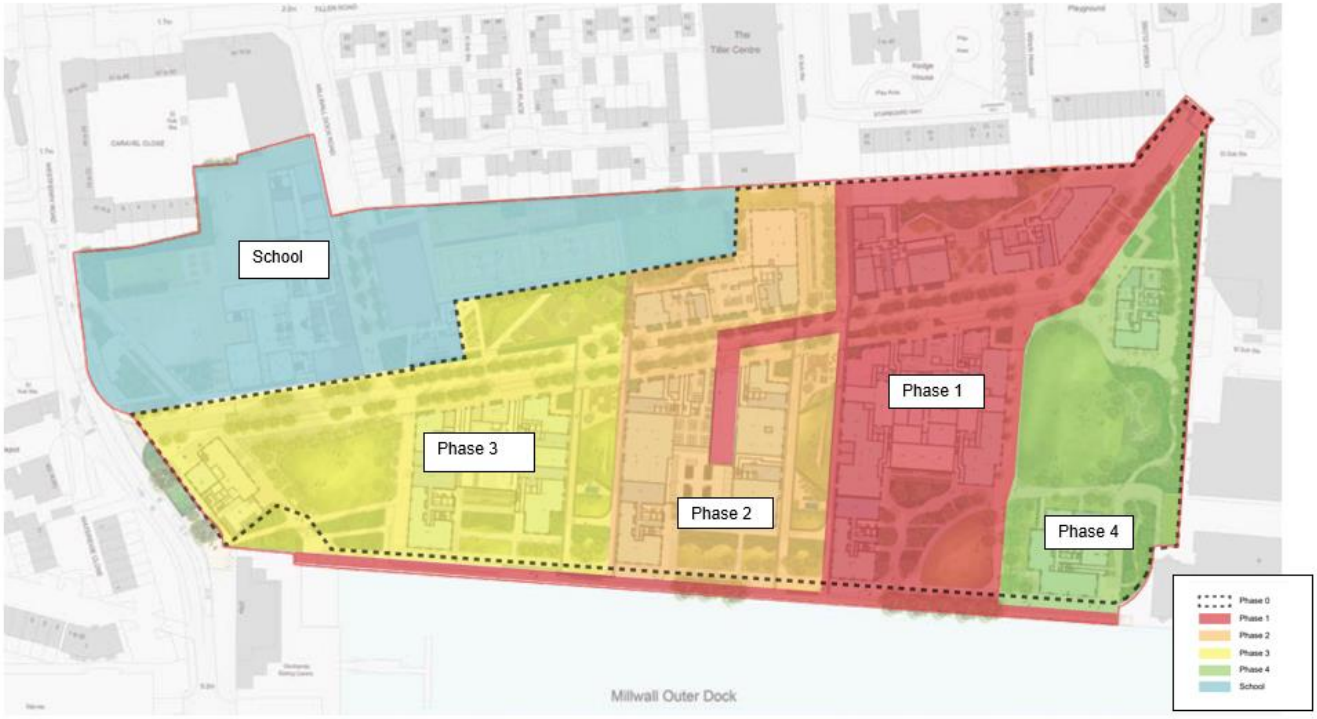

Figure 10: Proposed phasing strategy

2.16 Phase 0 (Year 0 would be 2024) which covers a period of 30 months would comprise the enabling works to complete the basement box.

2.17 Phase 1 would commence in year 1 (2025) and would cover a period of 26 months. Phase 1 will deliver buildings N1, N2, T3 and C3 to provide 459 homes of which 100 would be affordable.

2.18 Phase 2 would commence in year 2 (2026) and would cover a period of 29 months. Phase 2 would deliver buildings N3, C2 and T2 to provide 394 homes of which 96 would be affordable.

2.19 Phase 3 would commence in year 3 (2027) and would cover a period of 28 months. Phase 3 would deliver buildings C1, T1 and W1 to provide 230 homes of which 128 would be affordable.

2.20 Phase 4 would commence in year 4 (2028) and would cover a period of 32 months. Phase 4 would deliver buildings T4 and E1 to provide 275 homes of which 55 would be affordable.

2.21 The school will come forward separately from the phasing outlined above as the school will be constructed by the Department for Education (DfE). However, as set out in the submitted Environmental Statement, the school is anticipated to be constructed between year 0 and Year 2 (2024-2026) thus will be constructed in parallel with phases 1 and 2 of the wider masterplan.

3. RELEVANT PLANNING HISTORY

Application Site (Key Applications Only)

3.1 PA/22/02317/NC – Request for Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), in respect of the construction of a residential mixed-use scheme ranging between ground plus four to 30 storeys (approximately +110,90m Above Ordnance Datum (AOD)), comprising approximately 1,200 residential units, approximately 23,000m^2 of non-residential uses (likely to include retail, community uses and flexible workspace), public open space including parkland and improved access to the dockside, and enables the delivery of a secondary school. Scoping Opinion Issued 21/12/2022.

3.2 PF/20/00196 – Pre-application request for the erection of a temporary building for the purposes of a residential marketing suite, associated with the redevelopment of the site. Pre-application letter issued 26/10/2020.

3.3 PA/18/01877/R – Comprehensive mixed-use redevelopment comprising 1,524 residential units (Class C3), shops, offices, flexible workspaces, financial and professional services, restaurants and cafes, drinking establishments (Classes B1/A1/A2/A3/A4) and community uses (Class D1) car and cycle basement parking, associated landscaping, new public realm and all other necessary enabling works. Appeal Dismissed 18/11/2021.

3.4 PA/15/02216/A1 – Demolition of existing buildings and structures at the former Westferry Printworks site and the comprehensive mixed use redevelopment including buildings ranging from 4-30 storeys in height (tallest being 110m AOD) comprising: a secondary school (Class D1), 722 residential units (Class C3), retail use (Class A1), flexible office and financial and professional services uses (Class B1/A2), community uses (Class D1), car and cycle basement parking, associated landscaping, new public realm and all other necessary enabling work. The application is accompanied by an Environmental Impact Assessment. Approved by the Greater London Authority 04/08/2016.

Neighbouring/Nearby Sites (Key Applications Only)

3.5 PA/23/02097 (1 Selsdon Way) – Demolition of existing buildings and erection of a building up to 35 storeys, comprising residential (Class C3) uses, flexible Community Hub (Class E / F1), landscaping, public realm, plant, cycle storage, servicing and other associated works. This application is accompanied by and Environmental Statement. Application registered.

3.6 PA/20/02218 (Bellerive House) – Demolition of existing building and redevelopment to provide 151 residential units (Use Class C3) in a building of 25 storeys, including basement car parking, cycle parking, access, landscaping and associated works. Appeal dismissed 18/08/2021.

3.7 PA/20/01208 (3 Turnberry Quay, 4-10 Pepper Street, Balmoral House, 12 Lanark Square) - Demolition of the existing buildings and erection of a residential-led mixed use building providing residential units (Use Class C3), flexible community/commercial use floorspace (Use Class D1/B1), retail floorspace (Use Class A1/A3), landscaped amenity space, car parking, cycle parking and associated works. Application refused 27/01/2021.

3.8 PA/19/02534/A1 (Asda: 151 East Ferry Road) – A hybrid planning application (part detailed, part outline) for the demolition of existing buildings and the comprehensive, mixed-use, re-development of the site, comprising a maximum of 218,991sqm (GEA) of floorspace. Full details are submitted for 526 residential units (Class C3), flexible commercial floorspace, including a new food store (17,087sqm GIA - A1-A4/B1/D2), a primary school (D1), community uses (D1), public bus parking and a site-wide basement, with associated uses as part of the development including car parking (up to 410 spaces), cycle parking, and an energy centre. Building heights would range between a maximum of 17.4m AOD (3 storeys above ground level) and 60m AOD (15 storeys above ground level). Creation of new vehicular and pedestrian access and public realm works, including all ground floor hard and soft landscaping and other works incidental to the proposals, including a programme of interim works (which include a temporary multi-storey car park with 349 car parking spaces and a temporary access lobby to the retail food store). (Detailed Component)
Outline permission (with layout, scale, appearance and landscaping at upper levels being reserved) is sought for up to 111,137sqm GEA above podium level, comprising of between 1217 and 1446 residential units (C3), with associated private and communal podium amenity and landscaping, within four buildings with maximum heights ranging between up to 45.850m (AOD)/12 storeys and up to 115.50m (AOD)/32 storeys. (Outline Component)

This application is accompanied by an Environmental Statement. Permitted 01/07/2024.

3.9 PA/16/03518/A3 (49-59 Millharbour, 2-4 Muirfield Cresence and 23-39 Pepper Street) – Demolition of existing buildings at 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street and the comprehensive mixed use redevelopment including two buildings ranging from 26 storeys (90.05 AOD) to 30 storeys (102.3 AOD) in height, comprising 319 residential units

(Class C3), 1,708sqm (GIA) of flexible non-residential floor space (Classes A1, A3, A4 and D1), private and communal open spaces, car and cycle parking and associated landscaping and public realm works. The application is accompanied by an Environmental Statement. Appeal allowed 22/01/2018.

4. PUBLICITY AND ENGAGEMENT

Pre-application

4.1 The scheme has evolved through pre-application discussions with Planning Officers between June 2022 and November 2023. Two iterations of the scheme based on the principles of the 2016 planning permission have been considered during the course of the pre-application process. The first pre-application scheme (pre-app scheme 1) sought to deliver 1200 units and 7% affordable housing and sought to retain the consented height of all the towers. The second pre-application scheme (pre-app scheme 2) sought to increase the height of all the buildings within the masterplan to deliver 35% affordable housing and evolved into the scheme being considered under this report.

4.2 During the pre-application process the scheme was presented before the Council's Quality Review Panel in November 2022. The Panel Members raised the following summarised comments on the pre-application scheme:

- The panel noted that the masterplan was relatively fixed but wanted to know what changes have been made to the approved scheme.
- The panel noted that there was lots of open space but all the spaces were 20m wide or more and felt that it would be good to develop more of a hierarchy of spaces.
- The panel challenged the Applicant to develop spatial variety.
- The panel noted that there were lots of gaps in the masterplan and suggested more character built in around the spaces which need activities, or enclosure or definition.
- The panel noted that in planning terms the scheme was essentially the consented scheme with additional height.
- The panel noted that the character that is proposed is not quite being achieved and that there was no solid terrace of buildings to define the Boulevard as would be expected. They were concerned that within the B blocks the majority of frontages are back of house.
- The panel questioned the height, noting that within the courtyard blocks the increase in height was fine and makes sense but that does not necessarily require the height of the towers also to increase. The relationship between the towers and the Boulevard would not be lost by increasing the height of the courtyard buildings.
- The panel noted and questioned the substantial change in the bulk of the buildings. They stressed that it was essential that embodied and operational carbon is the driver for design and added that there needs to be more work to improve the efficiencies of the stair core.
- The panel felt that they did not understand the narrative behind the landscape and public realm.
- The panel sought more clarity on the impact of the wind on the landscape spaces and public realm.
- The panel considered that there needed to be a clearer understanding of the identified spatial character areas as the images shown felt very generic and overly formal. They noted that all the spaces within the masterplan felt similar. The panel felt that other uses could be accommodated across the site such as allotments or communal uses.

- The panel felt that there was an opportunity to make the Boulevard an exemplar street in sustainability terms which would have biodiversity impacts.

- The panel questioned the isolated location of the affordable housing and stated that they thought this was the wrong approach.

- In summary, the panel concluded that sustainability and the need for an environmentally focused approach to design was required across the site. There was a need for a stronger and richer character within the buildings and landscape and a hierarchy of space to be developed. The panel welcomed the activity at ground floor level but were concerned that the basement being built out was restricting the overall masterplan and the opportunity to make improvements across the entire site.

4.3 Following further evolution of the scheme, the proposals were presented again before the Quality Review Panel in September 2023. The following summarised comments were made by the panel:

- The panel felt that their comments from November 2022 were still relevant with regards to understanding the sense of place, identity, character areas and hierarchy of spaces. The panel still did not consider that they had a sufficient understanding of how the Boulevard would function and that they needed more detail to understand how the street would be experienced.

- The panel noted that there would be less space overall because of the additional tall building proposed (building E1).

- The panel noted that in the courtyards the daylight and sunlight into those spaces looked pretty shady, expressing concerns as to how pleasant those spaces would be.

- The panel remained concerned about the approach to activity and design along the Boulevard, sustainability and wind microclimate.

- The panel felt that the landmark tower should be very legible and did not consider this to be a landmark tower but simply 4 towers stepping down from east to west. They suggested that this interfered with the legibility of the marker building and the importance of its townscape role. They stressed that either the materials or scale of the building needed to be different to make it a landmark.

- The panel felt that there needed to be more variety and variation in the architectural language. They commented that the architecture was too rigid however they noted that E1 was an interesting building and quite special as an arrival building.

- The panel were confused as to where the Art Deco reference came from given the lack of Art Deco buildings in the immediate or surrounding context.

- The panel questioned the use of concrete panels in the school design noting that the carbon involved from the use of such materials.

- In summary the panel appreciated the amount of work undertaken but that it needed to be broken down and shown in much more detail. The panel concluded that there was a need for much more information and much more focused sessions for each part/phase of the proposals.

Statement of Community Involvement

4.4 The application has been accompanied by a Statement of Community Involvement (SCI) which details the Applicant's engagement with the local community prior to submission of the planning application. The Applicant has identified that they have engaged with a range of stakeholders between June 2022 and November 2023. Stakeholders identified include the

Docklands Sailing and Watersports Centre (DSWC), The Isle of Dogs and South Poplar Community Development Panel, the Department for Education and Canary Wharf College.

4.5 The SCI reports that a dedicated website was set up so that those interested parties who were unable to attend in-person events could keep up-to-date with the pre-application process.

4.6 A public exhibition took place between 27th and 29th September 2023 at the DSWC. Ahead of the exhibition, approximately 3399 invitations were distributed to local residents. The exhibition covered topics including design and layout of buildings, landscaping, open space and public realm, biodiversity and sustainability and environment.

4.7 The Applicant also took part in two community forums facilitated by Officers. The community forums were held in November 2022 and September 2023. The SCI reports that over 80 people attended each of the forums. Key themes during the first forum centred around housing, school, community facilities, commercial floorspace, open space, highways, construction, amenity impact and planning.

4.8 Questions on housing included a focus on the nature of the affordable housing provision, housing mix and tenure, a discussion around over-development and residential density. Questions were also raised with regards to the school in terms of design, construction and delivery.

4.9 The second community forum provided a presentation by the Applicant which addressed issues raised in the first community forum. Some new matters were also raised including the retention of trees on Tiller Road, impacts on water pressure, impact on biodiversity and raising the temperature of the water in the dock, impacts on the sailing centre and the impact of the school on Westferry Road.

Statutory publicity on the application

4.10 Upon validation of the planning application, the Council sent out consultation letters to 6820 nearby owners and occupiers on 19th January 2024. An advert was posted in the press and site notices were displayed around the site. Two rounds of overlapping consultations under Regulation 25 of the Environmental Impact Assessment Regulations 2017 were carried out in June 2024.

4.11 In total 1025 representations have been received with 968 in favour of the proposals and 51 objecting to the proposals.

General comments on the proposals

4.12 General comments received on the application, neither declaring support nor objection for the proposal, can be summarised as follows:

- Support redeveloping the site, however more affordable housing should be built and the site shouldn't have been left as a brownfield site for so long.
- It should be a condition of any planning permission to be granted to ensure that a new secondary school and public sports facilities are built (and that out of school hours the facilities should be open to the public).
- The lease for the school must be signed before any future negotiations related to the site or the site must be compulsory purchased if the developer does not sign the school lease.
- Do not support the provision of new houses but support the provision of a new school, however, also need a new doctors' surgery.
- The site needs an additional secondary school not just the relocation of Canary Wharf College.
- The existing leisure centre facilities do not provide enough low-cost access on the Island and do not have the capacity to add more users to its already overstretched facilities.

- Dedicated parks of an agreed minimum size (not pocket parks) complete with children's play facilities, basketball and football training areas and an outdoor fitness area for use by the local communities are required.
- Access to another library facility should be provided. The current Cubitt Town Library is the only one below Canary Wharf.
- The area already suffers from anti-social behaviour and gang issues because of a lack of access to meaningful, affordable places for young people. Adding more residents will only increase this burden.
- Need more nurseries as the waiting lists for all existing nurseries are very long.

Support for Proposals

4.13 The representations in support of the proposal are summarised as follows:

- General support for more housing and affordable housing to tackle housing crisis.
- The development will tackle deprivation by providing essential amenities and economic growth.
- The scheme will provide 379 new affordable homes and 35% affordable housing.
- Support the delivery of more social homes as rent levels are unaffordable.
- General support for scheme as there is not enough Council housing.
- General support for the proposal with no specific reasons cited.
- General support for better conditions.
- Support the provision of new schools and educational opportunities including more state schools.
- Existing schools are overcrowded and there aren't enough secondary schools.
- Support new sports facilities.
- Support the provision of more parks, playgrounds and public and community spaces.
- Support the provision of more shops, restaurants, cafes and workspaces and convenience shopping.
- Support the provision of more jobs.
- Would like to see more doctors' surgeries, healthcare centres, dentists and police facilities.
- The development has a superior design to the extant consent.
- Development will be a betterment for the community.
- The current state of the undeveloped site has long been an eyesore for the community. The proposed development offers a fantastic opportunity to transform this area into a vibrant and thriving hub that enhances local landscape and addresses pressing issues within the community.
- The development will alleviate the strain on local rent prices and introduce additional housing options, creating a more balanced and affordable living environment for residents.
- Support bringing life back to a waste ground that has laid empty for over 7 years.
- Support the provision of more nature, biodiversity, green spaces and greenery.

- Development is needed and it will be good for everybody in the area.
- There will be more accommodation for local residents and school places for local children.
- 3-4 bedroom homes are welcomed.
- Represents the investment that is needed to make Tower Hamlets more attractive to live.
- It is important to have a school not far where children can feel safe and therefore building more homes with a school will be a great advantage for the community. Children can attend after-school activities and bond with their neighbours.
- Vibrant waterfront development.
- Support the provision of more infrastructure.
- The development will enhance social cohesion and community integration.

Objections to Proposals

4.14 The objections to the proposal are summarised as follows:

Density and Overdevelopment

- The scheme is blatant over-development of the site. The independent Inspector for the two inquiries arrived at this conclusion twice previously. The current application is too dense and too high.
- The first application was more proportionate to the local area with more green space, soft play area and felt more liveable.
- The consented application is the maximum size of development that could feasibly be accommodated on this plot of land.
- There are currently proposals to develop Kleins Wharf directly opposite Westferry Printworks to deliver up to 450 homes. The two schemes will place too high a burden on the neighbourhood.
- The scheme has not considered the cumulative impacts of all approved developments which are nearby. Without taking a view of all these developments together, the true extent of the impact of massing and scale on the area cannot really be properly understood.

Character

- The extraordinary increase in people living in the development will disrupt the character of the area, enjoyment of the urban farm, the biodiversity of the dock's wildlife, the architecture of existing properties and shops and reduces the amount of green space available to residents of the island.
- More urban development will make the Island a less pleasant area to live.
- Same concerns remain as per the previous scheme.
- The proposal does very little to address the local character of the area and makes little effort to provide a community space for the public.
- The development feels like an isolated estate rather than a community hub which it needs to be.

Height and Scale

- The proposal conflicts with the local planning framework for the Isle of Dogs. Tower blocks are considered more appropriate in Canary Wharf and the northern part of the Isle of Dogs.

- Out of character with the surrounding area. The four enormous tower blocks are far in excess of the height of any nearby building and will blight the dock.

- General objections to the heights across the development and particularly the towers.

- Even the lower C blocks are above average height level.

- It would have been better to have a row of mid-height (4-5 storeys) blocks lining the banks of the Dock (similar to the homes found in Copenhagen lining the banks of the river), rather than the very tall towers that are currently proposed.

- Taller towers should be half the height of what is proposed.

- Tillier Road which is closest to the site is a low-rise street with a mix of houses and flats that are 1-4 floors high with one block of flats which is 10 floors high. The proposal will not look and feel proportionate to the immediate surrounding area. The proposal is still too high in the residential towers and consists of too many tower blocks in the design.

- The plan does not follow the general principle of "Step Down" from Canary Wharf to the water.

- Tower W1 immediately adjacent to Westferry Road is far taller than any other building along the road-front prior to Canary Wharf and immediately adjacent areas.

- It is not clear if the developer has made a 3D model available. The scheme should not be approved unless those making the decision have been able to view a 3D model and used it to assess the impact of density, massing and scale on the local area.

Appearance

- The façade cladding and colour choice bear very little resemblance to the heritage and character of the Docklands area. The development resembles a 60's grey concrete council housing estate.

- This is a missed opportunity to add some colour and character to the area.

- Design and architecture is bland.

Heritage

- The view from the Greenwich Observatory towards Canary Wharf would be destroyed as would the Canary Wharf Skyline.

Daylight/Sunlight Impacts

- The development will fail to meet recommended guidelines for daylight/sunlight for within the development.

- One third of the external spaces will suffer overshadowing and receive less than 2 hours of sunlight and will be gloomy and windswept.

- The development will result in significantly adverse impact in respect of daylight and sunlight on adjoining properties.

- The sun travels from southeast to the southwest for most of the year. The towers will undoubtedly carry a shadow for most of the year.

- Residential properties particularly in Claire Place will be significantly affected by loss of sunlight.

Transport

- Traffic control will be risky and dangerous for pedestrians.
- Pressure on existing DLR, bus services and local river taxis, cars and bikes.
- There is little or no capacity on existing buses to accommodate the additional persons resulting from the development.
- The addition of the secondary school would also make travel in both directions very difficult.
- There is no road safety audit submitted with this planning application.
- There is not enough parking on the development and what is being proposed is insufficient.
- There is a lack of parking spaces for school and drop-off of children; there needs to be more than just private parking.
- There needs to be a plan for transport. The waste collection services are already overwhelmed.
- There are insufficient transport links at present. The roads are considerably congested and there are only two routes into the Isle of Dogs. The development will only accelerate the degradation of the roads.
- Queries raised as to who qualifies as blue badge holders.
- Servicing vehicles will be large. The width of the Boulevard and the absence of a turning circle will encourage service vehicles to exit via Millharbour.
- The Millharbour entrance should be sealed and made available for emergency purposes only.
- There would be access issues for emergency services.
- Detailed consideration and analysis must be given to the locations of the much-needed zebra crossings to be located on Westferry Road. This needs to serve schools and bus stops in either direction, but the management of the speed of traffic is essential.
- The development takes no account of the current serious challenges of parents needing to bring their children to Arnhem Wharf Primary School by car and the parking challenges that result. The creation of a new secondary school, whilst welcomed and needed, will add to this really difficult situation.
- Off-street underground delivery bays should be accommodated that are high enough for supermarket home delivery vans or lorries undertaking removals or appliance/furniture delivery as well as waste collection.
- All delivery vehicles should be prevented from stopping on Westferry Road, particularly in relation to building W1.
- How will e-bike and e-scooter access to the site be managed?

Construction

- How are giant HGVs going to safely travel around tiny streets? What is the impact of this traffic on the Island as there is only one main road?

- This is not a phased project and 8 continuous years of work is going to deteriorate the quality of living.

- Concerns regarding the impact of pollution, both air and noise on Millharbour Road.

- There needs to be a full commitment to engage properly with the local community during any construction phase. There should be regular public meetings where residents can raise their concerns and there should be weekly communications from the site explaining what works are due to take place.

- During construction, the dockside along Millwall Dock must remain open; it is a vital travel route for residents.

- The phasing of the development should be changed. All the development around the school is due to happen at the end of the construction. This should be at the beginning. With the current phasing, the construction will be taking place adjacent to the school at precisely the time the school is occupied.

<u>Environment</u>

- Having a development next to the dock and the main road will interfere with the overall environment and hurt local wildlife as well as the local community.

- It will impact negatively on the environment and local well-embedded leisure pursuits such as the sailing club, other water-based leisure pursuits and accommodation such as the boats that are surrounding the dock presently.

- Noise and disturbance from construction activity will impact on the health of residents and increase levels of insomnia, morbidity and mortality, heart disease, high blood pressure, mental health and cancer.

- There will be problems with wind and impact to the sailing centre from the taller towers particularly.

- The developer must be required to make a substantial contribution to the Docklands Sailing and Watersports Centre (DSWC) so that it can comfortably overcome the enormous challenge that the development will create.

- Concerns about the proposed heat pump system which will extract cooler water from Millwall Dock and return it to the docks at a higher temperature and the impact this will have on fish and other species living in the docks as a result of these raised temperatures.

- Increased temperatures will trigger toxic algal blooms in the summer. This has happened before in the Millwall docks and poses a potentially large threat to water quality. Toxic water would endanger watersports activities and swans and ducks that inhabit the docks.

- The development will reduce air quality.

- There is not enough green and public open space to serve this development. Green space being provided in developments often have signs saying ‘no ball games’ making these spaces unusable by children or are fenced off.

- The design of the buildings should incorporate shading to prevent overheating of the many south-facing residential units, without the need to revert to unsustainable levels of air-conditioning.

- There is currently a problem with litter created by this development. This will be left to pile up.

Crime

- Crime and anti-social behaviour have risen over the years in the Island as land has been developed by private developers.

- The development will increase anti-social behaviour including illegal parking.

School

- There is a lack of commitment and clarity from the developer as to when the school lease will be signed. There is no assurance in the planning process for this.

- The school is being used as a ransom to obtain planning permission.

- There is no detail in the planning application about when the developer will sign the lease for the school.

- At the public community forum which was attended by Council officers prior to the submission of the planning application, the developer made a commitment that they would sign the school lease before the Strategic Development Committee meeting to consider the application. However, this is not detailed in the public consultation documents.

- Before Strategic Development Committee it needs to be made clear when the lease will be signed and under what circumstances and what the enforceable consequences will be for not signing.

- It should be conditioned that the lease is signed (based on the 2016 s106 agreement at least) should planning permission be granted and before any new s106 is negotiated.

- Concern that Canary Wharf College Secondary School will close because of the lack of a permanent large site and the impact of the Selsdon Way redevelopment of the car park.

- The Council should compulsorily purchase the site if the school lease is not signed.

- How will the school provide for a healthier lifestyle when there is so little space to play? 2 MUGAs and one 5-a-side pitch will not provide for an enriching curriculum.

- The school site is too small and challenging with insufficient local playing fields for team sports.

- The external pitches will need floodlighting for community use which will be detrimental to the adjacent houses.

Other

- The submitted Infrastructure Assessment is not adequate; there is no plan for how capacity for sufficient electricity, water supply and sewage capacity will be achieved. These utilities are under pressure.

- The development is driven by developer profit.

- The development is not sustainable in this location.

- There are insufficient amenities proposed. There are already not enough NHS dentist or doctor slots, schools are at capacity and the development will likely put strain on the emergency services who are already at breaking point.

- Increase in population of the local area without having the necessary services in place to accommodate all occupants.

- Concerns that an independent company has been pressurising residents to sign a form of approval and support for the development.

- Parents of children at Canary Wharf College have been advised by the trust leadership to support the development proposals. There is concern about the close relationship between the trust leadership and the developer. This does not represent the best interests of children.

- Compulsory purchase powers should be utilised to enable construction of the school to go ahead without blind consent to the development plans.

- The scheme will more than double the number of residents from the project originally presented.

- During community engagement with the developer there was a promise to come back to residents with questions that were raised. Residents have not been notified of the answers even though contact details were left.

- The scheme proposes more houses than what was agreed.

- There is no guarantee of the delivery of public services such as GPs that are needed.

- The new homes are not going to be affordable for local residents to purchase and there is a risk that a lot of the homes will remain empty.

- The development is likely to result in unjust service charges.

- There is no evidence that there is enough electricity, water and sewage supply to support the proposed development.

- The development is missing a sport centre with a public pool and a supermarket. Residents need an adequately priced supermarket to meet the daily living needs of Island residents. Access to Asda is likely to be impacted by the redevelopment of the site.

- Adequate provision for the collection and removal of waste and recycling needs to be included in the Westferry Printworks site including adequate bin stores underground where waste collection vehicles can access and load the waste underground.

- The scheme should only be allowed planning approval if the legal structure of the residential units is commonhold or share of freehold. Neighbouring sites are successfully managed by the leaseholders and Westferry Printworks should be no different.

- There needs to be a commitment to the provision of proper leisure facilities (sports centre, library and youth club) on the Island that are open to the public at all hours.

- The scheme should make provision for knocking down or modernising Tiller Road gym and then use space from the site to create a proper sized indoor sports and leisure facility for the population of the Island.

- Trees along Claire Place estate should be replaced.

4.15 Representations were also received from Robert Ogden Indescon Developments Ltd (ROID) who owns the long leasehold interest of Greenwich View Place, immediately adjacent to the site. The key issues and objections raised on behalf of ROID are summarised as follows:

- Considers that there are a number of missing documents and inconsistencies between the materials submitted and throughout the application and would question the robustness of the various assessments submitted.

- The Applicant has stated that the proposed development does not supersede any existing consents but the application materials explain that the delivery of the basement pursuant to permission PA/15/02216/A1 has commenced to the extent that sheet piling has been installed and the proposed development has been designed to integrate that implemented permission. If PA/15/02216/A1 is not superseded, the application material should demonstrate how the two permissions can be implemented contemporaneously in accordance with the findings of the Hillside judgement (November 2020).

- There is little detail around the type of retail space that will come forward in a particular commercial unit within a building or phase. The quantum assessed in the Town Centre Use Impact Assessment differs from that assessed within the Transport Assessment.

- Neither the Statement of Community Involvement nor the Planning Statement does not report comments received and acted upon during design development. In spite of 80 people attending both local forums and public exhibitions there is no representation of the issues raised by local people.

- The number of parking spaces proposed is inconsistent between the different planning application documents. There is nothing in the planning statement or elsewhere to suggest that the commitment for spaces to be let to 'blue badge' holders only will be secured by condition to ensure that residential car parking is not used by commercial uses.

- It is acknowledged that some of the basement structure exists already by virtue of the implementation of application PA/15/02216. However, delivering a basement of this magnitude and with this many spaces, leaving them empty seems wasteful. Also requiring visitors to park on surrounding roads impacting existing residents and occupiers is unacceptable.

- There is limited parking for gateway buildings E1 and W1 and none at all for N3 and E1. Information as to how accessible parking will be made available for mobility-impaired residents of the affordable accommodation must be provided.

- The EVCP proposed for basement parking will be a potential fire hazard and should be addressed robustly prior to determination.

- There has been no comprehensive drawing schedule submitted for approval. Public Realm drawings have been referred to but are not available on the Council's website. Drawings are badly labelled and difficult to align.

- No east-west sections through the masterplan have been provided and the elevations that have been submitted do not show the interface with the basement. East-west sections should be provided including through buildings E1 and T4.

- There is no assessment of the trees and hedges lining the eastern boundary of the proposed development site between Westferry Printworks and Greenwich View Place (GVP).

- The proposed site plan shows the location of a structure to the south-east corner of the site abutting the boundary with GVP however on the Design and Access Statement this is shown as public open space. It should be made clear in the planning application materials if the structure houses electricity substations. Its location would not be acceptable as it

located on the shared boundary between Westferry Printworks and GVP and would compromise the linkages between the sites. Details of its external appearance should also be provided.

- The application boundary may include some of the land forming part of GVP. It is also noted that formal notice was not served on the owner of GVP.

- It is noted that the development is proposed to be phased from west to east with the school coming forward in the first phase alongside the basement. Thereafter the central elements of the masterplan are proposed to come forward, largely serviced from Westferry Road. Phases 3 and 4 then comprise the delivery of the westernmost and easternmost plots, with the latter being accessed by construction traffic from Millharbour. It is not clear why the phasing has been chosen and it is proposed that a more logical sequence would be to deliver the masterplan east to west accessed at all times from Westferry Road.

- Millharbour is a single carriageway and there is usually unregulated parking on both sides of the road along its entire length and a roundabout at the southern end with a cycle docking station. It is considered that Millharbour is not suitable for construction traffic for a site of the size of Westferry Printworks, particularly given the three other sites consented but not yet fully active at the southern end of Millharbour. Use throughout the Masterplan construction, even after 3pm on work days, is unacceptable. Would request that a revised construction phasing and logistics plan is tested to evidence an improved environment for affected neighbours whereby construction traffic is managed entirely via Westferry Road.

- It is noted that off-site holding areas are proposed for construction vehicles waiting to access the site. Would seek confirmation that the holding area will be located away from Millharbour and accesses to GVP.

- The Transport Assessment provides insufficient information to evidence that the servicing of phases 1 and 2 can be achieved whilst construction of the later peripheral phases is underway.

- There are insufficient servicing bays incorporated within the masterplan based on the number of servicing vehicles expected to visit the site.

- The Boulevard is designated as the central servicing spine however the majority of the retail floorspace and food and beverage space is located away from the Boulevard. Trolleying of goods from van to store will be necessary adding burden on the service parking provision within the site. Consideration should be given to removing all service bays from the Boulevard and relocating them to the basement area.

- If articulated lorries are allowed to be on the site then swept path analysis should be provided showing how they turn around within the site and exit via Westferry Road. Use of Millharbour for large service vehicles is unacceptable.

- Track plots are provided demonstrating that service vehicles, including waste removal vehicles, can turn around at the roundabout on Millharbour. Significant volumes of service vehicles turning around at the roundabout could compromise access to GVP and neighbouring properties.

- Nature of proposed workspace referenced in the Commercial Demand Strategy is not clear. If it is intended for art-makers they may require vehicle access and therefore, this requirement should be assessed.

- No visitor parking is proposed however local parking provision is over-subscribed. It is not clear how lack of visitor parking provision is managed without impacting on existing neighbours. It is suggested that visitor parking should be provided in the basement.

- The design quality is insufficient and the proposed colour palette is bland and buildings lack an appropriate degree of articulation between horizontality and verticality.

- There is insufficient evidence within the submission of the actual quality of the spaces and public realm. Details of the types and sizes of trees proposed should be provided and details of fixtures and fittings within the public realm should also be made known.

- The masterplan should facilitate permeability and access to neighbouring sites so that high-quality development can be fully integrated.

- It is not clear why BREEAM Excellent cannot be achieved for all non-residential uses.

- There is no reference to achieving compliance with the Home Quality Mark as required by the Isle of Dogs Neighbourhood Plan (2021).

- Design should be tenure blind however it is noted that building E1 which is affordable has the lowest number of solar PV panels on the roof, which could disproportionately affect its energy efficiency and the cost of utilities for occupants.

- The affordable accommodation residents will be required to carry their waste to bin stores located on the Boulevard and in some instances the horizontal walk distances exceed the maximum 30m set out in the Building Regulations.

- The location of building E1 significantly reduces the area of open space to the east of the masterplan compared to the 2016 consent. It is considered that the lack of specific open space for the affordable blocks should be addressed. It is not clear how access to the communal courtyards within C1 and C2 will be secured for the long term as these spaces appear to underpin the communal open space provision for the gateway buildings and the northern plots.

- It is noted that play space for the 5-11 and 12+ age groups relies heavily on access to the school sports field and associated courts.

- There is no specific commitment for the school to be delivered by September 2026 as stated in the Planning Statement. Confirmation is required as to how delivery will be secured by a specific date to allow GVP to properly assess the likely impact of the proposed phasing of development and construction traffic and service vehicle movements during the interim phase.

<u>Further response to Reg 25 Consultation</u>

- Continues to object to the planning application on various grounds. Still concerned about the limited information provided about the external appearance of the substation and its location which will impede integration of any future residential-led mixed use redevelopment with GVP.

- The timing of the delivery of the school is fundamental to the proposed construction phasing plan. There is still no specific commitment for the school to be delivered by a particular date. It would seem counter-intuitive to request that a school be built and occupied whilst significant construction works are being undertaken around it with implications for safety, health, noise and air quality.

- Millharbour is not suitable for construction traffic for a site the size of Westferry Printworks, particularly given the three other sites consented but not yet fully active at the southern end of Millharbour. Use of Millharbour throughout the masterplan construction, even after 3pm on work days, is unacceptable.

- Off-site holding areas must be located away from Millharbour and accesses to GVP.

- There is still insufficient detail about the type of retail space that will come forward to determine the servicing requirements. There is also continued resistance by the applicant to use the basement to hold servicing vehicles.

- It has been explained that there are barriers at each end of the Boulevard to prevent the central spine from becoming a school drop off/pick-up point, but there is no specific information as to where these facilities will be provided.

- The proposed commitment to consult on the extension of the existing Controlled Parking Zones will not prevent pick-up and drop-off from occurring on Millharbour even if the extension is agreed. The Boulevard is exactly where this type of facility should be accommodated and the barriers must be removed to allow the free flow of traffic, including that which erroneously enters Millharbour.

- The on-site management team is fundamental to the operation of the estate. This commitment must be secured by condition to ensure the amenity of existing residents and occupiers of surrounding streets.

- Unless the extensive basement is redesigned to accommodate visitor parking and servicing vehicles and the Boulevard is opened to accommodate school pick-up/drop-off, the development would be unacceptable.

4.16 Representations have been received from George Green School and these are summarised as follows:

- The proposal to include a secondary school appears to contradict the borough's assessment of secondary school places required. The Planning for School Places 2023/24 Review and Recommendations notes that secondary school pupil numbers within the Borough are expected to remain steady in the short term however continuing decline in the pupil population will inevitably present a challenge for school sustainability in the primary sector over the next planning period and in the secondary and post-16 sectors in the longer term.

- George Green School would question the wisdom in building a 1200 pupil secondary school when the borough will likely have a decrease in student numbers.

- Given the document references an additional 'Elite 6th form' being explored by the borough, the school are concerned that this will have a detrimental effect on funding and resources for other secondaries in the borough.

- Whilst it is acknowledged that Canary Wharf College 3 (CWC) needs a suitable location, George Green School object to the size of the proposed secondary school on the site and would request the Planners to consider options for a smaller school more akin to the current establishment of CWC and without a sixth form.

- Given the needs George Green School has for significant investment in its estate, and a rebuilding scheme paused by the Mayor, the school are concerned about the impact a new secondary building on the Isle of Dogs will have without improvements in the estate at George Green's.

4.17 The Royal Yachting Association (RYA) initially objected to the application on the following summarised grounds:

- The RYA's main concern is the impact on the wind regime across an area that is used for training young and novice sailors. The RYA consider that the approach taken to wind modelling for similar developments elsewhere has been questioned by planning inspectors. It is unclear in this case how the trigger values for defining "significant" impact have been derived. An adverse impact on the wind regime, particularly increased turbulence, will place the club's continued use of parts of their sailing area at risk, with associated potential loss of income, and of opportunities for youth and adult sailing in this location.

- The Council should seek clarity both on the wind modelling assumptions, and on mitigations offered by the developer to reduce the impact of wind regime changes on DSWC.

Further comments to Reg 25 Consultation

- The RYA initially maintained their objections however they subsequently confirmed that as the Docklands Sailing and Watersports Centre had now reached an agreement with the Developer which has been signed, on this basis the RYA withdraws its objections.

5. CONSULTATION RESPONSES

External Consultees

Active Travel England

5.1 Given the role of Transport for London, Active Travel England will not be providing detailed comments on development proposals in Greater London.

Cadent Gas

5.2 No objections to proposal.

Canal and River Trust

5.3 The Canal and River Trust have provided a detailed representation concerning matters relating to the following: the structural integrity of the Millwall Outer Dock; the impact on the character and appearance of Millwall Outer Dock; and wind impacts on the water-based use of Millwall Outer Dock. Comments from the Trust have been summarised as follows:

5.4 The Trust notes that the plans indicate the intention to develop a basement level approximately 12m from the northern dock wall of Millwall Outer Dock. Excavation adjacent to the Trust's assets can cause undermining and collapse, lead to the creation of leakage pathways and inundation. These pose risks to navigation both in terms of water resources and potential collapse of supporting structures. The Trust requests that, if planning permission is granted, conditions are imposed requiring a survey of the dock walls and details of how the structural integrity of Millwall Outer Dock will be protected.

5.5 In terms of height and materiality, the Trust considers that the increase in height of the towers along the dockside will be unlikely to have a dramatic additional impact, visually or physically, directly upon users of the docks. The Trust has no comments to make on the impact on wider, and possibly more sensitive, long-distance views, which other consultees are likely to be in a better position to express opinions on. The architectural language seems appropriate as does the materiality.

5.6 The CRT notes in Chapter 14b Acquatic Ecology of the ES that the impact of anticipated shading of the dock space is expected to be negligible.

5.7 Supports the proposals for the waterside park, the provision of public open space adjacent to the waterfront, the dockside park and improved links to Millharbour.

5.8 The landscape-led masterplan and approach to reconnecting the wider area to the waterside is welcomed, with the provision of green spines, generous open space and increased permeability and opportunities for connectivity. The proposals should be reviewed at planning condition stage to consider opportunities to provide additional inclusive access points along the promenade and additional detail setting out the approach to materiality and wayfinding for these features.

5.9 The CRT acknowledges that the best course of action is to remove the 8 existing London plane trees along the waterside and replace with mature trees of a similar future stature and amenity value.

5.10 Would like to see clarification of hard landscape material specification as there is a discrepancy between the description of the resin-bound gravel in the public realm proposals and the colours shown in the CGIs. Further landscape details should be secured via condition.

5.11 Condition requested for further details of exterior lighting and lighting should be designed in a way that limits light spill over the water space.

5.12 CRT trust that the Council will seek the views of the DSWC and assess whether it is possible to mitigate the impact on sailing conditions and, if it is possible, secure the appropriate mitigation in relation to the proposed scheme.

5.13 There is an existing agreement with the CRT's Utilities Team for site drainage and surface water discharge to Millwall Dock.

5.14 The CRT request to be consulted on the Construction Environmental Management Plan (CEMP) to be secured by planning condition.

5.15 The proposal will incorporate the use of the dock water to transfer energy for the development's heat pump. The modelling showed that there was very little effect on dock water temperature.

5.16 Recreational use of the waterspace of Millwall Outer Dock is currently limited to sailing, canoeing and other water sports. There is potential to complement these activities with other forms of visitor attractions that provide a tangible connection with the once vibrant commercial life of the dock and an enhanced appreciation of its maritime cultural heritage.

5.17 CRT encourage waterside developments to consider the feasibility of using the docks to transport materials and waste as part of construction of the site. This should be secured via condition.

5.18 Conditions have been requested in relation to the submission of a waterway wall survey, details of measures to protect Millwall Outer Dock, details of hard and soft landscaping and a landscape management plan, details of lighting and waterborne transport feasibility.

City of London

5.19 No objection

Docklands Sailing & Watersports Centre (DSWC)

5.20 The DSWC have not formally submitted representations for this planning application. However, correspondence has been received stating that the DSWC confirm that notification of the planning application was received. The DSWC has been discussing the current application with the applicant both before and since its registration. This has included an assessment of the wind impact, facilitated by the applicant. It is anticipated that the DSWC will reach an agreement on measures needed to address the proposed development's impact on the DSWC's operations in the near future.

5.21 The DSWC's representations will depend on the outcome of those discussions. The DSWC request that they be permitted to make representations up to 21 days before the application is considered by Members but will advise the Council of the position before that if they are able.

Environment Agency

5.22 No objections subject to conditions being imposed requiring the submission of remediation strategy and verification plan, written consent for any piling, deep foundations, or other intrusive groundworks, submission of monitoring and maintenance plan and a verification report in respect of land contamination.

Greater London Authority – Stage 1 Referral

5.23 Land Use Principles: The principle of the residential-led mixed use redevelopment of this large, cleared brownfield site within an opportunity area is established and strongly supported.

5.24 Affordable Housing: The proposed scheme would deliver 35% affordable housing, by habitable room, on a tenure split of 70/30 in favour of London Affordable Rent. The proposal would meet the requirements for the Fast-Track Route and is supported.

5.25 Urban Design and Heritage: The site is located within an area identified for tall buildings and the site layout is broadly supported. The scheme would result in less than substantial harm to various heritage assets, including the Maritime Greenwich WHS. This harm will be weighed in the planning balance at the Mayor's decision-making stage.

5.26 Transport: A contribution towards Crossharbour DLR station is required, alongside bus capacity mitigation. Concerns have been identified surrounding access and circulation through the site and how this would facilitate safe and comfortable cycling and pedestrian routes, including links to existing and future pedestrian and cyclist routes. The significant number of disabled persons parking spaces is not acceptable and this space should be allocated to a sustainable land use from the outset. Further public realm, highways works and contributions have been identified and must be secured.

5.27 Other issues on sustainable development and environment also require resolution prior to the Mayor's decision-making stage.

5.28 Tower Hamlets Council are advised that the application does not yet comply with the London Plan and possible remedies set out in the Stage 1 report could address these deficiencies.

Historic England (GLAAS) – Archaeology

5.29 The planning application lies in an area of archaeological interest. This Tier 3 Archaeological Priority Area has potential to contain both paleoenvironmental evidence and evidence of prehistoric human activity such as that identified at nearby Atlas Wharf. A buried prominence beneath the site is likely to have been a dry and habitable location within the wider marsh since prehistory and multiperiod activity can be expected at the site, including activity associated with the Chapel House 18th century settlement. Parts of the dock complex are listed, reflecting the national importance of the docks and their role in the international mercantile supremacy of London until they closed in the 1980s. Numerous industrial archaeology remains survive relating to this period.

5.30 The main impact from the proposed development will be the further excavation for basements, revised distribution of piled foundation locations and associated drainage and servicing, especially in the areas which differ in layout from the previously consented scheme.

5.31 Earlier advice provided to the LPA concluded the development impacts of the updated scheme are similar in archaeological terms to those of the scheme previously granted consent at the site, and can be managed with conditions.

5.32 The applicant has submitted an updated desk-based assessment which also includes an updated geoarchaeological deposit model as an appendix. The assessment adequately summarises the significance and potential of the site and complies with current policy, standards and guidance. The site has been sufficiently evaluated previously to make an informed recommendation.

5.33 The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. Recommends that a condition be imposed requiring the submission of a written scheme of investigation.

Historic England – Buildings

5.34 Consider these new plans to be an improvement on the previous application for the site which was refused at appeal stage, and broadly similar to the consented scheme in terms of the impact on the historic environment.

5.35 The visual impact of these new proposals on the historic environment is set out in the Built Heritage, Townscape and Visual Impact Assessment. The impact of the proposed development from the Maritime Greenwich World Heritage Site (particularly LVMF view 5A.1 from the General Wolfe Statue), and from London Bridge towards Tower Bridge (particularly LVMF 11B.1) appears similar to that viewed at pre-application stage. The reduction in height of the proposed building T5 from 27 to 15 storeys is noted and has slightly reduced the visual impact in both these views, and this is a welcome change.

5.36 Taking account of the approved development for the site, and the location of the proposed development within the Council's Tall Building Zone and site allocation (Westferry Printworks 4.12), Historic England do not wish to raise any significant concerns about this specific scheme.

5.37 Historic England would however take the opportunity to reiterate general concerns about the creep of tall building development further south within the Isle of Dogs and the potential for further encroachment on the setting of the Maritime Greenwich World Heritage Site. The Council's Local Plan Policies concerning tall buildings and heritage should be taken into account in determining this application.

Health and Safety Executive (HSE) Gateway One

5.38 Following a review of the information provided in the planning application, HSE are content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.

5.39 However, HSE has identified some matters that the Applicant should try to address, in *advance of later regulatory stages*.

5.40 It will be for the applicant to demonstrate that the means of escape is capable of being safely and effectively used at all material times, including during firefighting operations, and that the proposed performance-based solution(s) provides an equivalent level of fire safety to that of code compliance.

5.41 A habitat or green roof may constitute a fire hazard as it requires a regular management and maintenance regime. It will be for the applicant to demonstrate that the proposed green roofs are viable in relation to fire safety. This will be subject to further consideration at a later regulatory stage.

5.42 The plans indicate that the design includes residential apartments that incorporate open plan kitchen facilities. Cooking facilities should be located at the most remote part of the flat to protect the means of escape.

5.43 The basement and level 00 plans indicate considerable car parking and cycle storage areas. It is advisable to consider the risk to fire safety due to the presence of electric vehicles (EV) as they contain lithium-ion batteries. It will be for the applicant to demonstrate that the proposed fire safety design standard is suitable and that the proposed development complies with building regulations at subsequent regulatory stages.

5.44 Where the installation of photovoltaic panels is proposed it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings. Consideration should be given to ensuring that all power supplies, electrical wiring and control equipment is provided with appropriate levels of protection against fire. This will be subject to further consideration at a later regulatory stage.

<u>Updated Comments to Reg 25 Consultation</u>

5.45 HSE notes the additional information regarding the secondary school. HSE has assessed this application in terms of fire and rescue service vehicle access to the relevant buildings(s) located adjacent to the proposed school building to ensure that suitable fire service access and parking remains available at all times. Following a review of the information, HSE is

content with the fire safety design of the proposed development, to the extent that it affects land use planning.

London City Airport

5.46 No objections subject to the imposition of conditions requiring the submission of a Bird Hazard Management Plan, landscaping scheme, details of obstacle lights on buildings over 100m above ground level and details for the erection of cranes.

London Fire Brigade

5.47 Detailed comments have been provided on matters concerning evacuation lifts; access and facilities for the fire and rescue service; proposed vertical means of escape design; green roofs; photovoltaic cells; cycle storage and car parking. These are areas of consideration that would need to be addressed by the project design team.

London Underground/DLR Infrastructure Protection

5.48 No comments to make on the application.

London Borough of Greenwich

5.49 No objections.

Metropolitan Police – Designing Out Crime Officer

5.50 No objections to the proposal subject to a condition requiring the submission of details of security measures demonstrating that secure by design standards shall be achieved.

NATS

5.51 The proposed development does not conflict with NATS safeguarding criteria therefore there are no safeguarding objections to the proposal.

Natural England

5.52 Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes therefore have no objection.

NHS North East London

5.53 The NHS would be seeking a s106 capital contribution of £4,699,614 attributed to the increase in residential properties proposed in the development.

Port of London Authority (PLA)

5.54 The PLA has no in principle objection to the proposed development.

5.55 It is considered in line with policy SI15 (Water Transport) of the London Plan (2021) that full, detailed consideration of the use of navigable waterways for the transportation of construction and/or demolition materials which would likely displace a significant number of HGV movements from the local highway is included as the design progresses. It is therefore considered that this requirement is ensured through an appropriately worded planning condition.

5.56 With regard to passenger transport, it is noted that nearby riverbus services at Canary Wharf and Masthouse terrace piers are referred to within the submitted Framework Travel Plan. Whilst this is welcomed it is recommended that the final Residential Travel Plan Framework (RTP) specifically refers and promotes these services and associated timetables as part of the provision of travel information for all new site residents. This must be reflected in any associated planning condition for the production of a final RTP for the development.

5.57 The PLA considers that it must be ensured that there are no negative impacts on the operation of the Dockland Sailing and Watersports Centre (DSWC). It is noted within the submission that the applicant is working directly with the DSWC to identify a set of measures that will secure the long-term future and viability of the DSWC following the completion of the development. This set of measures should be clearly set out and agreed as part of the development.

5.58 As part of the promenade design adjacent to the dock. it is considered that further information is provided on the provision of any appropriate riparian lifesaving equipment (such as life buoys, grab chains, access ladders, etc).

5.59 It should be ensured, as part of the wayfinding strategy for the site, that pedestrian and cycle links to the nearby Thames Path to the west are also included and promoted as part of the development.

5.60 In principle it is welcomed that the proposed phasing strategy specifies that the external landscaping bordering Millwall Outer Dock, and the pedestrian link between Millharbour and Millwall Outer Dock, are to take place as part of phase one of the overall development.

Sport England

5.61 Sport England objects to this application and requests mitigation for the water sports centre and amendments to the school proposals to better facilitate use of the school's sports facilities by the community.

5.62 Sport England's position remains that due to the impact on the Sailing and Watersports Centre the proposals conflict with London Plan policies. Sport England considers that the Council should continue to seek mitigation from the developer to reduce the impact on the watersports centre. It is not clear from the application documents reviewed what is being offered with this application to address the adverse impact on sailing and the watersports centre resulting from this development.

5.63 Open Space: For such a large development with so many residents (who will not have their own gardens) the spaces provided are not large and there is no large green space to accommodate sports activity safely. There are water trees, footpaths and homes that would make it very difficult to use what is provided as a kick about area.

5.64 Secondary School: As there is little open space elsewhere on the development it is essential that the school's multi use games area and the school hall are made available for community use. The planning application indicates that these will be made available but more information is required on the details (for example, the location of fences and access). It is helpful that the sports hall and MUGA have their own access to facilitate out of hours access.

5.65 In the winter it gets dark at 4pm so it would be reasonable to allow lighting of at least one of the MUGAs so that the local community can have some evening use, even if these hours were to be limited to reduce impact on local residents. It is essential that facilities are provided to meet the needs of the 3,259 people living in this development that have no gardens and limited space to play and exercise.

5.66 Sports Hall Design: Sport England have reviewed the plans for the school sports hall and we request that these are amended. Sport England's recommended dimensions for a school sports hall supporting community use are: 34.5m x 20m x 7.5m with a GIA of 690sqm. Storage should be a minimum of 12.5% of the floor area. If the hall is also to be used for exams then additional storage should be allowed for desk/chair storage, so it is recommended that the hall is enlarged.

5.67 It is recommended that the changing room layout is also reviewed in line with Sport England guidance. It is good that you cannot look directly into the changing rooms, but the layout looks difficult to navigate. It is also difficult to comment on the plans without the benches being shown. It is helpful that cubicle showers are included but will the accessible shower be provided within the accessible changing spaces? Without the details it is difficult to comment

on their design. Details of the flooring are also important, for example gymnastics, netball etc require sprung floors.

5.68 Artificial Pitch Design: As this is a secondary school it would be preferable for the games courts to be larger pitches. There are 2 MUGAs proposed and a single 5-a-side pitch. Details of the surfaces of the pitches have not been included. The applicant should be required to provide these. Will these facilities be fenced? These facilities should be adjusted to meet the recommended Sport England guidance. In particular, the 5-a-side artificial pitch should measure 37 x 18.5m and include recesses for goal storage.

5.69 Active Design and Active: Recommends that the design of the planning application is reviewed against the detailed checklist contained within 'Active Design' (2023) guidance for assessing the design of development proposals to ensure that they create an active environment.

5.70 CIL: Sport England would encourage the Council to consider sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct those monies to deliver new and improved facilities for sport. Ensuring that the school sports hall and multiuse games area are open for community use will help to meet need generated by the development.

5.71 Sport England requests that conditions are imposed to secure community use hours of the sports hall facility and further design details of the sports hall, multi-use games area and artificial pitch.

Updated Response to Reg 25 Consultation

5.72 Sport England upholds its objection to this proposal for reasons set out in their original response. Sport England may withdraw their objection if further amendments are made to the proposals for the school sports facilities and mitigation is provided for the impact on the watersports centre.

Thames Water

5.73 No objections to surface water network capacity or foul water sewage network infrastructure capacity. Thames Water have requested conditions requiring the submission of a Piling Method Statement, details that all water network upgrades required to accommodate the additional demand to serve the development have been completed; or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. A further condition has been requested prohibiting the building over or construction within 5 metres of strategic water mains unless information detailing how the developer intends to divert the asset/align the development so as to prevent the potential for damage to Thames Water infrastructure have been submitted and approved.

The Gardens Trust

5.74 Do not wish to comment on the proposals at this stage, however this should not signify The Gardens Trust's approval or disapproval of the proposals.

Transport for London (Detailed Stage 1)

5.75 TfL's detailed Stage 1 key comments are summarised as follows:

5.76 Healthy Street Transport Assessment & Active Travel Zone: TfL welcome that the proposal is supported by a Healthy Streets TA and associated daytime and night-time ATZ assessment. TfL have assessed the routes and have detailed where improvements should be provided.

5.77 Pedestrian, Cyclist and Vehicular Access: The proposed pedestrian and cyclist access would be gained via points surrounding the site. A key concern is over the feasibility of the access point via Starboard Way. Whilst the application has designed the site to facilitate this access point this route would face an issue of an existing resident's car park. This route is a key link to improve the permeability of the site and clarity is sought over the realistic delivery of this link and its detailed design.

5.78 Vehicular access would be gained from Westferry Road and Millharbour for blue badge holders and servicing vehicles. The access would be controlled via bollards at various points on the site. TfL consider that the Applicant should amend the servicing strategy to prevent vehicular access from Millharbour. Westferry Road provides a better function and access to cater for the majority of servicing trips.

5.79 School access would be gained via Westferry Road and Millwall Dock Road to the north. Further details on how access would be managed and controlled via school times should be provided. Public realm works along Millwall Dock Road should be clarified.

5.80 The development of the site presents an opportunity to open up active travel connections on the Isle of Dogs, including providing public access to the dockside. The applicant needs to demonstrate how the site would link up to existing and future pedestrian and cyclist routes. At present the scope of works is very limited and does not reflect the scale of opportunity presented by the development of this strategic site.

5.81 Highway Works and Public Realm Improvements: The proposal would deliver a new east-west link from Westferry Road to Millharbour, referred to as 'The Boulevard', a private street permeable to pedestrian and cyclist movements. Whilst the opening up of the site will provide public realm and green spaces which align with Healthy Street principles, public access in accordance with the Public London Charter should be confirmed.

5.82 In terms of the realignment of Westferry Road, the proposed design remains as per the implemented planning consent. The design includes the proposed relocation of an existing bus infrastructure and is not supported in its proposed form due to operational and pedestrian safety concerns. A full Designer's Response to the stage 1 Road Safey Audit should be supplied with recommendations integrated into the detailed design.

5.83 At present, no improvements to Millharbour are proposed which, given the size and scale of the proposed application, is a missed opportunity and design should be drawn up and reviewed prior to determination to incorporate an improved environment which is fit for purpose and supports increased active travel and safety for all road users.

5.84 TfL recommends that contributions/works in kind for off-site highway improvements including to support walking and cycling are secured by the Council, to be informed by the ATZ assessment, Isle of Dogs OAPF and Local Connections Study.

5.85 TfL would expect the applicant to contribute towards wayfinding on site and within the area via upgrading existing Legible London signage, and/or providing additional signage if deemed required by the Council.

5.86 Public Transport Impact: The scale of these proposals will increase demand considerably at Crossharbour DLR station and a contribution proportionate to that previously secured for this and other sites in the vicinity will need to be secured. A financial contribution (£2,621,250[2]) towards Crossharbour Station and to bus services in the region of £300k is required.

5.87 Car Parking & Controlled Parking Zone: The applicant is proposing a total of 146 blue badge spaces. Noting that a basement space has already been delivered under the extant consent, the applicant should be allocating the space to active travel or innovative sustainable travel solutions from the outset. TfL considers that the over provision of blue badge is not acceptable on this occasion and has the potential to undermine the car-free nature of the development and fails to optimise the site. TfL has previously cited examples of how the basement space could be better utilised including as a sustainable last mile delivery hub for e-cargo bikes. A Parking Design and Management Plan should be secured via condition and all spaces should have an Electric Vehicle Charging Point (EVCP) from the outset.

5.88 TfL recommends the Council secures a contribution which would provide the option to consult on and implement and necessary extension of the CPZ within the vicinity.

[2] It should be noted that TfL have agreed a revised figure of £1,186.600 for the DLR contribution.

5.89 Other Comments: TfL requires exemplar cycle facilities to be provided and cycle parking must demonstrate compliance with the LCDS. TfL requests a financial contribution of £220,000 and land safeguarded within the site to provide an additional docking station as part of any permission. A travel plan should be secured within the S106 agreement. The Delivery and Servicing Plan should be updated to review the servicing trips and to ensure that the number of servicing vehicles is robust.

5.90 TfL also has concerns over the feasibility of the proposed operation; it is noted that access to the site would be restricted via traffic bollards and the applicant is proposing access one way through the site (west to east or east to west). Delivery and servicing vehicles will likely wish to enter and egress via the same access point however currently turning facilities do not appear to have been considered. The use of Millharbour as a main access point should be reconsidered in consultation with the local highway authority. The proposal needs to also demonstrate safe operation of access point from Westferry Road, allowing vehicles to enter and egress the site in forward gear.

5.91 A final Construction Logistics Plan should be secured via planning condition.

Transport for London (Crossrail)

5.92 No comments to make on the application.

Internal Consultees

LBTH Air Quality

5.93 No objection subject to the imposition of conditions requiring the submission of a Dust Management Plan, the carrying out of PM10 monitoring, details of kitchen extraction for commercial uses and details of all plant and machinery to be used during construction.

LBTH Affordable Housing

5.94 LBTH affordable housing team sought clarity on whether the proposal is fast-track whilst welcoming a slightly higher delivery of family sized units in the affordable rented tenure. However they noted slight deviation in policy with regards to the provision of one and two bed unit with the intermediate tenure, and a policy shortfall in the number of family sized units with the private tenure. They also noted that the Council does not have a policy to support studio units with the private tenure.

5.95 They commented that there is a requirement for all family sized affordable rented units to benefit from a separate kitchen area and this has not been met, however welcomed the overprovision of family sized affordable rented units within Phase 1 of the scheme. Within the private element of this phase they again noted a lack of policy for studio sized units, a slight over provision of 1 bed units, and a significant under provision of family sized units. They also noted that one of the blocks (C2) did not meet the GLA policy which limits the number of units per core to eight.

5.96 They queried whether the scheme meets the Councils preferred rental policy of 50% London Affordable Rent, and 50 % Tower Hamlets Living Rent in the affordable rent split and whether the developers are in partnership with a Registered Social Landlord who is on the Councils preferred list.

5.97 With regards to wheelchair units, they noted that the wheelchair units within the intermediate tenure will not be allocated via the common housing register. Within the affordable rented tenure they commented that the wheelchair units will need to benefit from two double bedrooms, as the wheelchair user is likely to be a child needing space for additional equipment. The also commented that details of the units will have to be provided at a scale of 1:50 for the purposes of Occupational Health comments and requested for this to be conditioned. They also commented on Fire Safety and the requirements to meet Part M, however these matters are addressed elsewhere in this report.

5.98 They queried how wheelchair users will fully access the parking areas and whether or not there will be drop-off points for wheelchair users where their blocks do not benefit from basement parking. They also sought an allocation of parking spaces for the affordable rented wheelchair units.

5.99 From a design perspective, they queried:

- the refuse arrangements, the design of the open/play space, and single aspects units in the affordable tenure,
- the open space in relation to the school will be used and managed and how this relates the overall provision of amenity/playspace,
- whether the Met Police Secure by Design Officer has been consulted, and
- residential space standards for each unit.

5.100 All these matters are addressed elsewhere in this report.

LBTH Arboricultural Officer

5.101 There are 8 trees recorded in the submitted AIA, all with a BS categorisation of B. These trees are located on the towpath and are owned and managed by the Canal & River Trust. They are not recorded on the AIA as being protected with TPO's, although I believe they are.

5.102 The rationale for their proposed removal is due to damage caused to the towpath from root growth. These trees offer important amenity value as individual trees and collectively and we would not support their removal for the reasons outlined above.

5.103 Whilst there is evidence of damage to the towpath caused from tree root growth, an alternative engineering solution should be sought to mitigate any trip hazards.

LBTH Energy and Sustainability

5.104 The Energy Officer is satisfied with the proposed Energy Strategy subject to securing the required carbon off-setting contribution, connection to a district heating network and BREEAM excellent rating for all commercial units exceeding 500sqm in floor area.

LBTH Growth & Economic Development

5.105 Based on the build cost of the development there is an obligation to provide 135 apprenticeships during the construction phase.

5.106 The developer should exercise best endeavours to ensure that 20% of the construction phase workforce will be local residents of Tower Hamlets.

5.107 20% of goods/services procured during the construction phase should be achieved by businesses in Tower Hamlets.

5.108 A financial contribution of £651,826.40 is required to support and/or provide the training and skills needs of local residents in accessing the job opportunities created through the construction phase of all new developments.

5.109 End-use phase of the development will require a contribution of £99,796.13 towards the training and development of unemployed residents in Tower Hamlets.

5.110 The developer should exercise best endeavours to ensure that 20% of the end-user phase workforce will be local residents of Tower Hamlets and a minimum of 1 apprenticeship opportunity.

LBTH Health Impact Officer

5.111 It is unclear when healthy design elements such as play areas and cycle parking will be delivered, if management plans are needed, etc. The Health Chapter should also include a

recommendation to carry out future monitoring of health impacts of the proposal. Due to the strategic scale of this development, this is an important consideration.

5.112 Construction: Due to the long-term nature of the construction project it is recommended that meanwhile uses are designed into the site phasing strategy, such as temporary open and play spaces, community food growing etc.

5.113 Employment and Income: It is appreciated that the applicant has agreed additional enhancement measures that include employment initiatives within the s106 agreement for the construction phase. However, there is nothing secured for the completed development. Can job opportunities for local people be secured via s106, particularly around community centre, community food growing on the site and commercial units?

5.114 Child Play Space: It is recommended that there should be SEND provision within child playspaces.

5.115 Housing Provision: In terms of daylight/sunlight, are affordable units disproportionately affected by rooms with lower levels of daylight? And / or are there units where majority of rooms have daylight levels < BRE recommendations?

5.116 Diet and Nutrition / Healthy Food: Can it be secured via planning for any café/restaurants to sign up to the council's Healthier Catering Commitment and Food for Health awards?

5.117 Food Growing: It is suggested the growing area will provide opportunities for residents, including children, to learn about food growing. It should not be assumed that this will happen organically. Additional measures should be put in place to ensure the growing area is accessible to all residents, particularly those that do not ordinarily get involved with food growing and from a variety of tenancies to promote community cohesion. An educational programme would help residents learn about food growing and may provide a job to a local resident.

5.118 Open Space, Leisure and Play Space: The site allocation in the Local Plan mentions contributions to the green grid, not just links to it. Can the proposal make contributions to the surrounding grid, in particular to improve access to existing green spaces and public transport, particularly while new parks are yet to be delivered?

5.119 Applicant to advise when each open space will be accessible in relation to completion of residential units. A range of high-quality open spaces should be available to residents upon moving in. The open spaces should be made welcoming to neighbouring residents through community events, signage and urban design.

5.120 Inclusive urban realm: How will inclusivity of the proposed development be ensured and then monitored? Monitoring is advised to ensure the open spaces are well-used by a mix of tenancies, and mitigation measures put in place if not the case.

5.121 Community Identity and Social Participation: How will community identity and social participation across all tenancies and the wider community be monitored? How will social value be monitored? Monitoring is advised so that mitigation measures can be put in place if participation from certain groups is lacking.

5.122 Will Central Hub in Building C3 be accessible to tenants of affordable units?

5.123 Retail and food spaces will likely be unaffordable to low-income families in and around the development, if left to market forces. Can community café uses/affordable offerings be secured, for instance as a way of activating vacant units upon completion of development?

5.124 Can training opportunities for workers in commercial floorspace be secured via planning? For instance, the GLA's Good Work Standard.

5.125 Noise and Vibration: Can the applicant advise whether noise from the podium on 1F units has been considered, and how this will be mitigated through management of these spaces?

LBTH Health and Safety

5.126 Construction Phase: The development should comply with the Construction (Design and Management) Regulations 2007 specifically in order to secure the incorporation of safety matters in the development from the start, including the production of a "Health and Safety File" for the client and future users(s).

5.127 The Health & Safety File constitutes a record of the health and safety information for the project's client or end user and the responsibility for its preparation and up keep rests with the Planning Supervisor.

5.128 It is considered desirable for the Planning Supervisor to discuss the Health & Safety file with the client early on in the project and the contents of the file will vary according to the complexity of the project but typically will include;

a) record of as built drawings and plans;
b) general details of the construction methods and materials;
c) details of the structure's equipment and maintenance facilities;
d) operating and maintenance manuals supplied by contractors and equipment manufacturers;
e) procedures for cleaning;
f) information relating to the location and type of emergency systems and firefighting equipment, etc.

5.129 The Applicant will be required to comply with various legislative requirements in respect of matters relating to workplace health and safety, asbestos, use of cooling towers and evaporative condensers and special treatment licences.

LBTH Land Contamination

5.130 No objection subject to the imposition of a condition requiring the submission of a remediation scheme, a site investigation scheme, a verification plan, a monitoring and maintenance plan and a post-completion verification report.

LBTH Noise and Vibration

5.131 Vol 3 ES noise chapter and 'Appendix: Noise and vibration' in ES Volume 3: Technical Appendices were reviewed. I have the following comments on noise and vibration aspects:

5.132 Section 2.3 in Annex 10 of the Appendix to Vol 3 in ES Volume 3: Technical Appendices: Any acoustic characteristic content i.e. tonality and intermittence etc is found in measurement of noise sources (such as system from data system and power plant) affecting T4 and N3 etc. Please explain and document. Also please ensure noise mitigation measures for receptors are in place.

5.133 Section 3.3.3 in Annex 10: LBTH Local Plan requires 10 dB below background as design criterion for fixed plants. Please explain why 5 dB above prevailing background is acceptable. Any noise impact to future receptors? Please also review the proposed glazing requirement and ensure BS8233 is met for future noise-sensitive receptors.

5.134 Please provide a map showing the key fixed plant sources and a preliminary inventory of its sound power data.

5.135 Table 2.8 in Annex 10: Some locations such as W1 will be affected by traffic noise from A1206 etc. Please also adopt use of Rw +Ctr[3] to show noise compliance.

5.136 Last para of section 2.8 in Annex 10: Does only T4 need enhancement? Please advise. Please review and confirm noise mitigation measures in all proposed noise-sensitive receptors are sufficient.

5.137 Table 2.10 is missing. What are the details of the level of enhancement likely to be required?

5.138 Annex 8: Noise Contour Plots (Construction Noise) Max label in Annex 9 is >= 65 dBA. Please add/adjust label colour bands to suitably distinguish noise level in Table 11.14.

LBTH Occupational Therapists (OT)

5.139 Initially requested that some of the Affordable Rented units identified as 3B4P units be changed to 2B4P units however this would have had policy implications elsewhere across the scheme. Following the Applicant's suggestions that the living rooms of these units were reduced to increase the single bedroom sizes, the OT Team's preference were that the units remained as per submitted.

LBTH SUDS (Flood and Water Management)

5.140 Flood Risk: A Flood Risk Assessment (FRA) has been submitted. With the development being located within a flood zone 3a, the site has a 1in100 or greater annual probability of river flooding (>1%), and a 1in200 or greater annual probability of flooding from the sea (>0.5%) in any given year. Consequently, the development is protected to a high standard by the Thames tidal flood defences and third-party river walls. However, there are still risks associated with a breach of defences. Therefore, the development is required to implement flood mitigation measures throughout the development to protect residents and users of the building from potential flood risk.

5.141 The mitigation measures should include but not be limited to: no residential accommodation or vulnerable uses on the ground floor or within the basements, all finished floor levels (FFL) and electrically sensitive and critical infrastructure throughout the site be set 300mm above the TE2100 threshold to improve the site's overall flood resilience. However, the FRA states that FFL will vary throughout the site due to the site's topography and where the FFL are below the TE2100 breach level no sleeping accommodation has been proposed and additional flood mitigation measures have been suggested but not specified nor committed to within the current FRA. Additionally, it must be noted that the current proposed FFL and overall site layout with regards to floor levels etc appear to have been initially agreed by the Environment Agency on pre-application consultation. However, they will need to be consulted again as they raised concerns around the FRA they reviewed being outdated (2014 FRA version).

5.142 Furthermore, as the ground floor level of the site will mainly comprise of a secondary school, commercial retail space (Class E), residential entrances and entrance lobbies and no residential accommodation are proposed on the ground floor this will reduce the overall flood risk vulnerability of the site. However, as the northwestern and northeastern part of the development will be below the current and future breach levels with potential flood depths of over 2.5m respectively. Therefore, it is a must that the development incorporates a resilient means for safe access/egress with designated evacuation routes and provides adequate safe haven areas on upper floors. A Flood Warning and Evacuation Plan (FWEP) will need to be in place for the lifetime of the development and this should be secured by condition.

5.143 Groundwater Flood Risk - Basement: The submitted FRA appears to have not adequately addressed the site's groundwater flood risk as no consideration has been given to groundwater levels nor groundwater flow routes. The site is situated in an area that has the potential for elevated levels of groundwater flood risk.

[3] RW means the Weighted Sound Reduction Index and Ctr is an adjustment factor which is used to account for low frequency noise.

5.144 Furthermore, the development proposal incorporates a very large basement underneath nearly the whole development which serves buildings C1, C2, C3, T1, T2, T3, and T4. However, the applicant has only briefly referred to the proposed basement. Therefore, we have no way of assessing the potential effect this will have on the local area. This is further compounded by residual flood risks associated with the adjacent Millwall Outer Dock located along the southern boundary of the site. For that reason, a basement impact assessment will need to be completed and secured via condition. This must assess how the proposed basement will impact groundwater on or around the site and must provide adequate detail with regards to the groundwater flood risk and potential mitigation measures.

5.145 Surface Water Flood Risk: The FRA states there are surface water flood risks associated with the northwestern and northeastern sides of the development with both being classified as 'High Risk areas' with potential flood depths of up to 2.5m. Consequently, the northwestern part of the site falls within a designated Critical Drainage Area (CDA) which aligns with the surface water findings. Therefore, the site will need to guarantee safe provisions are put in place to guarantee no surface water flooding occurs on site nor within the wider catchment area because of any overland flows leaving the site.

5.146 Sewer Flood Risk: The FRA confirms that there has been historic sewer flooding within the vicinity of the site, but has given no further approaches to mitigate sewer flood risk from the site. Consequently, Thames Water will need to be consulted in order to confirm the surrounding sewers have the required sewer capacity to meet the increased sewerage demand for the whole site once it is fully operational.

5.147 The FRA states the Millwall Outer Dock is located along the entire southern boundary of the site and the Millwall Inner Dock is located approximately 140m north-east of the site and both docks form part of the London Docklands and are managed by the Canal and River Trust. Therefore, the Canal and River Trust will need to be consulted to confirm they are happy there will be no detrimental impact because of the development works.

5.148 The FRA provided for the proposed development does not comply with Policy SI.12 of the London Plan, as it does not give appropriate regard to the risk of surface water, groundwater, and sewer flooding. Further information should be provided with regard to the proposed basement and a basement impact statement needs to be produced.

5.149 Drainage Strategy: We do not accept the current drainage strategy proposal and would recommend total refusal of planning permission until a satisfactory drainage proposal has been developed that meets current set local and national SuDS and drainage policy requirements. This is because the current drainage strategy has given no regards to the most recent set drainage and SuDS standards as it hasn't specified overall surface water discharge rates for the entire site and has not given adequate information on how surface water will be managed throughout the site.

5.150 The current drainage proposal is to split the entire site into five sections with each discharging surface water into different drainage systems and water bodies. From the five sections, three of which cover an area of only 0.36ha and are currently proposing to discharge at a total rate of 98l/s via three different outfalls with two going directly into combined sewers in both Westferry Road at the northwestern section of the site (CDA) and Millwall Dock Road and the third into a surface water sewer at the northeastern side of the development. However, no attempt has been made to reduce the discharge rate for these three sections and with the size of the development we do not believe this is in line with policy requirements as a maximum discharge of 5l/s would be expected at each connection point. Additionally, the current calculations for these sections have not factored in the 40% uplift that is required for climate change. Currently, only a 1 in 100-year calculation has been made. As a result, a calculation of 1 in 100-year + 40% climate change needs to be undertaken and show how this will affect the discharge rates.

5.151 Furthermore, no calculation or assessment has been provided which shows at what discharge rate the largest section of the development will be discharging directly into the Millwall Dock

at the southern part of the development via the three outfall connections. Therefore, we are unable to see how surface water will be managed throughout the site. Additionally, no surface water storage volumes nor attenuation requirements for the site have been provided, meaning we are unable to guarantee safe design should the dock outfall pumps fail.

5.152 The site covers a large area and is within the area covered by the Integrated Water Management Plan (IWMP). No regard has been given within the drainage strategy to meet any of the recommendations made within this document. The surrounding area has limitations with regards to sewer capacity and water demands and we believe the site without additional measures will have a detrimental effect on the surrounding infrastructure.

5.153 We appreciate the proposal to include SuDS features such as green roofs, rain gardens and permeable paving. But no further information has been provided to show how these will work together on site, or what they will consist of nor how much storage capacity they will generate within the development site. There hasn't been adequate information provided on the SuDS hierarchy assessment and no reasoning why additional SuDS cannot be included within the drainage design for the site.

5.154 The surface water drainage strategy for the proposed development does not comply with Policy SI.13 of the London Plan. More detailed hydraulic calculations should be provided. Additional information on SuDS should be incorporated.

5.155 Maintenance: The applicant has submitted a typical maintenance regime for the drainage scheme. It's important to confirm details of agreed adoption, monitoring and maintenance of the drainage and SuDS features.

5.156 Residual Risk: Safe and appropriate flow routes from blockage and exceedance of the drainage system must be evaluated. This must demonstrate no property flooding or increase in flood risk, either offsite or to third parties.

5.157 Conditions: A detailed surface water drainage scheme will need to be submitted to the LPA prior to works commencing.
Conditions requiring a satisfactory FRA, and a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment towards in compliance with the SuDS hierarchy shall be submitted to and approved by the local Planning Authority.

Updated Comments

5.158 The updated FRA has answered and addressed original concerns and therefore the FRA is now fit for purpose and acceptable.

5.159 With regards to the drainage strategy, we welcome the inclusion of three separate attenuation storage tanks and the subsequent reduction of all three outfalls to a maximum of 5l/s which are discharging via Thames Water combined sewers as this will reduce the overall impact on the surrounding drainage and this approach is accepted. There are still some reservations around the developer not providing discharge rates for the three outfalls into the Millharbour Dock. There wouldn't be concerns for the rates themselves, but the discharge rates are needed to fully assess how surface water is managed throughout the site and if pumps were to fail what is the back-up plan.

LBTH Transportation & Highways

5.160 The applicant has proposed changes to the previous scheme. This includes the removal of general car parking from the site and provision for accessible blue badge parking only. In terms of transportation policies this is acceptable. Works to the basement, based on the previous scheme, which included general car parking, have been completed which means that 100% blue badge parking could be achieved on site if required, which is exceptional in terms of provision. However, it is considered that this is unlikely when the development opens and so it was suggested that some of this space could be used for temporary 'meanwhile' uses which could appeal to the local community rather than be left empty (which could also

encourage the use by other car users). This should be explored as a further potential for reducing trips. Blue badge bays should only be available to residents within the development who are in receipt of a valid blue badge and should be allocated on a needs basis, regardless of tenure, and leased, not sold. EV provision needs to be in line with policy requirements. All blue badge spaces are to be retained and maintained for their approved use only (including the aforementioned meantime uses) for the life of the development.

5.161 A legal agreement for a 'Permit Free' scheme, restricting all future residents from applying for permits on the public highway, will form part of the s106 (or similar legal document as agreed by the case officer).

5.162 A parking survey undertaken by the applicant shows that the local public highway network is at stress and any overspill would be problematic. A financial contribution is required to investigate the feasibility of extending the hours of operation of the local parking zones(s) in order to better manage any overspill, particularly in the evenings and overnight.

5.163 In terms of cycle parking the applicant proposes to meet the London Plan standards. All designs must meet the London Cycle Design Standards. All cycling facilities to be retained and maintained for their approved use for the lifetime of the development.

5.164 Given the potential for cycling and walking from the site we would seek a financial contribution (s106 or through CIL) towards active travel initiatives locally and further afield.

5.165 Servicing is proposed to take place on site with a central Boulevard allowing eastbound access from Westferry Road to Millharbour. This isn't fully supported and allowing vehicles to turn within the site would be preferable. Millharbour is often heavily trafficked and forcing all vehicles onto this road will exacerbate existing conditions.

5.166 Changes to the highway network: A scheme of highway works was agreed with the applicant on the previous scheme. It is noted that TfL no longer support this mainly on the grounds of bus movements. It is also noted that the RSA stage 1 audit raises some concerns that need to be addressed. It is essential that a comprehensive scheme of improvements on Westferry Road is agreed and it is suggested that further work is required on this.

5.167 In terms of trip generation and impact on public transport, LBTH support TfL in any request for financial contributions which will be used towards public transport and / or active travel improvements.

5.168 The applicant has submitted some draft management documents and we will expect full versions of these as conditions. The applicant is informed that the Council adopted a new Code of Construction Practice in April 2023 and any demolition and construction documents are required to be provided in the formats requested. Further details are on the Council's website. The assessment of these documents is now a paid-for service.

5.169 In principle there are no major objections to the proposal. However, the changes to the scheme and the elapsed time since the previous submission has raised some issues which need to be addressed before the highways DC team can give full support.

Updated Comments

5.170 Unfortunately, the applicant has not taken on board the suggestion for meantime uses in the basement, and the reasons given are acknowledged. However, this results in a fragmented parking regime with spaces spread out over the large basement which does not make for a perceived secure environment and also leads to a lot of dead space. It would still be preferable to see a scheme where the blue badge spaces are somewhat centralised initially with other potential temporary uses identified in the basement, which could benefit the local community.

5.171 In terms of servicing the applicant has agreed to the suggestion to allow vehicles to turn within the site to avoid being forced eastbound onto Millharbour and has provided details of where

smaller vehicles could turn within the site. This is welcomed. The proposed convenience store within the development is large enough to house a 'Metro' type supermarket which are often / mainly serviced by large articulated vehicles. It is suggested that as part of the lease that vehicle size is restricted to smaller delivery vehicles so as not to impact unnecessarily on the local highway network, on either Westferry road, where there are schools and a bus route, or on Millharbour, which is a narrow road and does not have a direct route onto Marsh Wall. The applicant should also consider the visual impact of servicing a convenience store on the public realm and design in areas which would prevent refuse receptacles and steel cages being left out on the public realm and design areas for these to be stored or prohibit the leaving of these items on the public realm.

5.172 The Service Management Plan submitted is of good order but would like to see it go further and set out preferred delivery times for all residents and occupiers that avoid the peaks and school start / finish times. This could be incorporated into the leases for the commercial / retail units and into the travel plan for residents. Whilst it is inevitable that not all service vehicles could be controlled like this, such as couriers, etc, all occupiers of the development should be strongly encouraged to time deliveries, where it is within their power to do so, to suitable times.

5.173 The service management plan should explicitly state that no vehicle servicing the site should either park or wait on the public highway should parking bays on site be full. All vehicles associated with the servicing of the site should be accommodated within the site. In view of the above comments, the submitted SMP is considered a draft document and we would expect an updated version as a condition, should planning permission be approved.

5.174 We would like to see the access to the site from Westferry Road include a Copenhagen-style raised crossing to provide a level footway all along the eastern kerb. The s278 agreement also needs to extend to the Millharbour entrance and we would expect to see a scheme of highway works drawn up to improve this junction / roundabout area.

5.175 A scheme of this density is reliant on access to good public transport and the ability to encourage the use of more sustainable options, such as walking and cycling. The nearest public transport hub is at Canary Wharf and residents and other occupiers should be encouraged to walk / cycle to the hub if they wish to then use public transport. The proposed South Dock Bridge is a key element to unlocking the PTAL of some sites, including this one. An active travel zone assessment has been undertaken by the applicant and identified problems should be mitigated against. Given the potential for cycling and walking from the site we would seek a financial contribution (s106 or through CIL) towards active travel initiatives locally and further afield. A sum of £250,000 towards walking and cycling initiatives to link up and improve the local walking and cycling infrastructure is requested.

LBTH Waste Team

5.176 The applicant is proposing an in-bin compaction for non-recyclable waste across the development. It is essential that the compaction rate be no more than 2 to 1 and that the bins are presented at a location (half the 10m drag distance) to minimise the handling and movement to the vehicle as a health and safety consideration. The surface that the bins roll on must be smooth, even and level from the compaction point to presentation point, and to the loading point of the vehicle with no raised thresholds etc. Doorways or any other restriction on route must have larger clearances to allow for the handling of heavier bins.

5.177 The segregation of residential and commercial waste is satisfactory. A controlled vehicular route between Westferry Road and Millharbour has been proposed from which all waste collection would be undertaken (excluding the school), thereby removing the need for vehicles to make unnecessary turning movements within the site. This route will remain unadopted with access managed. This is acceptable. Residential access to bin stores are within the required guidelines and is acceptable.

5.178 The Council provides a once-a-week collection service from residential units for all waste streams . There would be adequate provision for the storage of waste for an eight-day period.

This is satisfactory. Commercial waste across the development will be feasibly managed. The proposed bulky waste collection is acceptable.

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 (published March 2021) ("the London Plan")
- Tower Hamlets Local Plan 2031 (adopted January 2020) ("the Local Plan")
- Isle of Dogs Neighbourhood Plan (2021) ("the Neighbourhood Plan")

The Council has undertaken consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a new Local Plan. This consultation on the draft Local Plan has subsequently been completed. A further round of consultation under Regulation 19 of the above Act is expected to take place in the coming months. The draft Local Plan currently has limited weight.

6.3 The key development plan policies relevant to the determination of this proposal:

Growth (building strong and inclusive communities, making the best use of land, opportunity areas, strategic and local regeneration, areas of growth and opportunity, delivering sustainable growth).

- London Plan Policies: GG1, GG2, SD1, SD10
- Local Plan Policies: S.SG1, S.SG2.
- Neighbourhood Plan Policies: D1, ES1

Land Use (opportunity areas, principle of housing, principle of retail/town centre uses, supporting the network and hierarchy of centres, community uses).

- London Plan Policies: GG4, SD1, SD6, SD7, H1,
- Local Plan Policies: S.H1, S.TC1, S.CF1.

Design: (layout, townscape, appearance, materials, tall buildings, public realm, safety and security, fire safety, inclusive design)

- London Plan Policies: GG2, D1, D2, D3, D4, D5, D6, D7, D8, D9, D11, D12
- Local Plan Policies: S.DH1, D.DH2, D.DH4, D.DH6, D.DH7.
- Neighbourhood Plan Policies: D1, D2

Heritage: (historic environment, world heritage sites, local and strategic views)

- London Plan Policies: HC1, HC2, HC3, HC4.
- Local Plan Policies: S.H1, D.H2, D.H3

Housing: (increasing housing supply, affordable housing, housing mix, housing quality, play and informal recreation, accessible housing, monitoring affordable housing).

- London Plan Policies: GG4, D6, D7, H1, H4, H5, H6, H7, H10, S4.
- Local Plan Policies: S.H1, D.H2, D.H3.

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

- London Plan Policies: D3, D6, D9, D14
- Local Plan Policies: D.DH8, D.ES9

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

- London Plan Policies: T1, T2, T3, T4, T5, T6, T6.1, T7, T8
- Local Plan Policies: S.TR1, D.TR2, D.TR3, D.TR4

Environment: (air quality, wind/microclimate, urban greening, biodiversity, contaminated land, energy efficiency and sustainability, sustainable drainage, flood risk, waste, protecting waterways including use and enjoyment, water transport).

- London Plan Policies: D1, D3, D8, D9, G1, G4, G5, G6, G7, SI1, SI2, SI3, SI4, SI5, SI7, SI8, SI12, SI13, SI14, SI15, SI16, SI17.
- Local Plan Policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.MW1, D.MW2, S.OWS1, S.OWS1, D.OWS3
- Neighbourhood Plan Policies: CC1, CC2, CC3, SD1

Social Infrastructure: (developing London's social infrastructure, education and childcare facilities, sports and recreation facilities, new and enhanced community facilities, health impact assessments)

- London Plan Policies: S1, S3, S4, S5.
- Local Plan Policies: D.CF3, D.SG3.

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

National

- National Planning Policy Framework (2023)[4]
- National Planning Practice Guidance (updated)
- National Design Guide (2021)
- National Model Design Code

Greater London Authority (GLA)

- Fire Safety LPG (Draft)
- Development Viability LPG (Draft)
- Digital Connectivity Infrastructure LPG (Draft)
- Fire Safety LPG (Draft)
- Air Quality Positive LPG (2023)
- Air Quality Neutral LPG (2023)
- Characterisation and Growth Study LPG (2023)
- Housing Design Standards LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Urban Greening Factor LPG (2023)
- Circular Economy Statements LPG (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- Whole Life Carbon LPG (2022)
- Be Seen Energy Monitoring LPG (2021)
- Affordable Housing and Viability SPG (2017)
- Housing SPG (2016)
- Social Infrastructure SPG (2015)
- Accessible London: Achieving an Inclusive Environment SPG (2014)
- The Control of Dust Emissions during Construction and Demolition SPG (2014)
- London View Management Framework SPG (2012)
- Play and Informal Recreation SPG (2012)
- All London Green Grid SPG (2012)
- Planning for Equality and Diversity in London SPG (2007)

[4] A draft NPPF was published for public consultation on 30th July 2024 which may be subject to change and currently has limited weight.

Tower Hamlets

- Reuse, Recycling and Waste SPD (2021)
- Planning Obligations SPD (2020)
- High Density Living SPD (2020)
- Community Infrastructure Levy (CIL) Charging Schedule (2020)
- Tower Hamlets Biodiversity Action Plan 2019-2024
- Development Viability SPD (2017)
- Parks and Open Spaces; An Open Space Strategy for the London Borough of Tower Hamlets 2017-2027.

Other

Building Research Establishment (BRE) "Site layout planning 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. Housing
iii. Quality of Residential Accommodation
iv. Urban Design
v. Public Open Space/Public Realm, Biodiversity and Ecology
vi. Built Environment
vii. Amenity
viii. Transport
ix. Environment
x. Health Impact Assessment
xi. Infrastructure Impact
xii. CIL and S106 Planning Obligations
xiii. Local Finance Considerations
xiv. Equalities and Human Rights

LAND USE

Principle of Development

7.2 The National Planning Policy Framework ("NPPF") promotes the presumption in favour of sustainable development through the effective use of land driven by a plan-led system, to ensure the delivery of sustainable economic, social and environmental benefits. Planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

7.3 Objective GG2 of the London Plan requires that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must amongst other things, enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites.

7.4 Policy SD1 of the London Plan identifies the Isle of Dogs as a designated Opportunity Area. The London Plan recognises Opportunity Areas as being the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The policy expects development proposals within

Opportunity Areas to, amongst other things, support wider regeneration, maximise the delivery of affordable housing, support the creation of employment opportunities and the creation of mixed and inclusive communities to integrate development proposals to the surrounding areas for regeneration.

7.5 Table 2.1 to Policy SD1 indicates that the Isle of Dogs Opportunity Area is capable of accommodating an indicative capacity of 29,000 new homes and 110,000 new jobs up to 2041. The Isle of Dogs and South Poplar Opportunity Area Planning Framework ("the OAPF") was formally adopted in September 2019. The OAPF establishes a plan for delivering housing and jobs in the OAPF area through the London Plan's Good Growth principles which benefits all residents and delivers improved links between existing and future communities.

7.6 The Local Plan identifies that the application site lies within 'Sub-area 4: Isle of Dogs and South Poplar'. The overarching vision for this sub-area is that by 2031, the Isle of Dogs and South Poplar will have a cohesive mix of housing, employment and leisure uses within distinctive, inclusive and vibrant neighbourhoods, which have a strong sense of place.

7.7 The application site also lies within site allocation 4.12 (Westferry Printworks) which identifies housing and employment as being appropriate land uses for this site. The site allocation also seeks to secure infrastructure requirements in the form of the delivery of a minimum of 1 hectare of strategic open space and a secondary school.

7.8 The residential-led mixed used redevelopment of the site has essentially been established by the extant planning permission. The scheme will contribute towards housing delivery (as detailed in the Housing section of this report) and the creation of new employment opportunities.

7.9 The Environmental Statement (ES) details that the proposed development will make a positive contribution to the assessed Local Impact Area and the borough's employment levels as a result of the proposed on-site commercial and employment-supporting floorspace (retail space, office space, community facilities, secondary school, nursery/creche). In this regard the ES estimates that the proposed development will support up to 404 gross FTE (Full Time Equivalent) jobs and 341 net FTE jobs once the development has been completed and is fully operational. These figures are inclusive of 140 gross FTE (gross and net) jobs at the secondary school. In addition to this, the period of construction work for the proposed development is expected to generate approximately 395 FTE jobs per year over the construction period.

7.10 The scheme also includes the provision of the delivery of a secondary school and a minimum of 1 hectare of strategic open space which would align with the land use requirement of the site allocation and the site's location within an Opportunity Area. The redevelopment of the site to contribute to the delivery of growth is supported in principle subject to compliance with all other relevant Development Plan policies.

Principle of Housing

7.11 The NPPF seeks the delivery of a wide choice of quality homes which meet identified local needs, in accordance with the evidence base, and to create sustainable, inclusive, and mixed communities. Paragraph 123 of the NPPF advocates that previously developed land (brownfield land) should be effectively reused in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 124(c) of the NPPF emphasises that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

7.12 The London Plan emphasises that there is a pressing need for more homes in London and that providing a range of high-quality, well-designed, accessible homes is important to delivering good growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. Strategic objective GG4 states that to create a housing market that works better for all Londoners, those involved in planning and development must, amongst other things, under Part (C) create mixed and inclusive

communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

7.13 Policy H1 of the London Plan sets a ten-year target for net housing completions that each Local Planning Authority should plan for. As such, the Borough is required to deliver 34,730 (3,473 per year) new homes between 2019/20 and 2028/29.

7.14 At the local level, Policy S.H1 of the Local Plan commits to securing the delivery of at least 58,965 new homes across the Borough (equating to at least 3,931 new homes per year) between 2016 and 2031.

7.15 As the site falls within an Opportunity Area whereby growth is expected to be accelerated and has a site allocation whereby residential use has been deemed an appropriate land use, the provision of 1358 residential units of which 35% (equating to 379 dwellings) would be affordable would positively contribute to the borough's housing stock, noting that there is an acute local and national demand for increased housing. The principle of housing on this site is therefore welcomed, supported and considered acceptable.

Commercial Uses

Flexible Commercial/Retail Floorspace

7.16 Paragraph 91 of the NPPF requires local planning authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

7.17 Policy SD6 of the London Plan seeks to promote and enhance the vitality and viability of London's varied town centres. Policy SD7 of the London Plan requires development proposals to take a town centre first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A(1)-A(3) of the policy. Policy SD7 essentially requires development proposals for main town centre uses outside of town centres to apply the sequential test, and to prepare an impact assessment for proposals for new or extensions to existing, edge or out-of-centre development for retail, leisure and office uses. Out-of-centre locations should not result in a net increase in retail or leisure floorspace unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact requirements in Parts A(1) and A(2) of this policy.

7.18 Policy S.TC1 of the Local Plan requires developments to support the role and function of the borough's town centre hierarchy and the provision of town centre uses. Policy D.TC3 of the Local Plan states that outside of the borough's Major, District and Neighbourhood Centres, new retail development will be subject to a) a sequential test, and b) an impact assessment where individual units or extensions exceed 200sqm metres gross floorspace.

7.19 The site falls within an edge-of-centre location as defined by the NPPF as it lies within 300m of Crossharbour District Centre. The scheme proposes main town centre uses outside of an existing designated Town Centre location. However, the principle of such uses has been established under the extant planning permission which secured the provision of 1,541sqm of formerly A1/A3/A4 floorspace. The Appeal Scheme proposed to increase the retail offer to 4,732sqm and this was deemed to be acceptable following a sequential test and impact assessment undertaken under planning application PA/18/01877.

7.20 Notwithstanding this, it is noted the proposed development seeks to secure 5,354.4sqm of commercial floorspace falling within use Classes E(a)-E(c) (retail, food and drink on premises and financial/professional/any other services principally to visiting members of the public) which is an increase of 3,813.4sqm of floorspace from the extant planning permission and 622.4sqm above the quantum of retail floorspace assessed under the Appeal Scheme.

7.21 The Applicant has submitted a Town Centre Use Impact Assessment and the sequential site assessment identifies that the local scale of the retail floorspace proposed is required in this specific location to serve the needs of the new local residential, school and worker community

being created on site. The proposed retail floorspace is integral to the comprehensive mixed-use development of the site and will only come forward as part of the site's wider redevelopment. As such the assessment reports that it is not necessary to consider the potential to accommodate this floorspace as a separate entity in nearby centres.

7.22 The site's specific characteristics such as the dock's water frontage forms a key part of the site and the development proposals in this specific location. The quantum of commercial/retail floorspace proposed is identified as being vital to ensure social integration on this specific site and as part of this development.

7.23 Overall, Officers agree that the level of retail floorspace would be ancillary in nature and specific to the site. Officers are satisfied that the sequential assessment for this site has been appropriately undertaken.

7.24 In terms of the impact assessment, the assessment has been undertaken in line with paragraph 017 of the National Planning Practice Guidance (NPPG) which requires the impact test to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. The impact assessment confirms that the scale of retail would be ancillary in scale with the operator mix and small number of units designed to predominantly serve local residents and on-site workers, teachers and students at the secondary school, the localised walk-in catchment area and visitors to the site (including those associated with water sport activities).

7.25 The impact assessment has considered the following existing nearby District and Neighbourhood Centres/Parades: Crossharbour District Centre, Barkantine Estate Neighbourhood Centre, Westferry Road Neighbourhood Parade and Manchester Road Neighbourhood Parade. The assessment reports that the quality, range and mix of operators represented throughout the network of these town centres is not sufficient to meet community needs and offer a very limited range of services to meet only the basic and everyday needs of the local community living adjacent to each respective centre.

7.26 Manchester Road Neighbourhood Parade and Crossharbour District Centre are not identified as being within 'local' reach of the new community at the application site, being a 25 minute and 15 minute walk away respectively. The proposed development will improve connectivity to Crossharbour, contributing new population and spend to support the district centre which will be redeveloped and revitalised as part of the development approved under planning permission PA/19/02534.

7.27 The Westferry Road Neighbourhood Parade is described in the impact assessment as a 'run-down' parade containing only five units and is also located some distance from the application site (10-15 minutes' walk). The Barkantine Estate is closer to the site (5-10 minute walk) and is also described as being 'run-down' with an intimidating environment offering a poor quality and mix of operators.

7.28 The assessment concludes that the above existing town centre locations serve localised walk-in everyday 'top up' shopping needs, and whilst trade diversion is therefore unlikely, the substantial population growth will mitigate any impact arising. All existing town centres will benefit from the regeneration, revitalisation and an increase in available expenditure across the Isle of Dogs. The Crossharbour District Centre will benefit from the redevelopment proposals and investment with a large anchor foodstore attracting shoppers from a broader catchment area. The foodstore does and will continue to drive linked trips throughout the district centre and the proposed development will not divert this trade given the differentiated retail offer.

7.29 The impact assessment assumes that of the total 5,354sqm (GIA) of Use Class E(a)-(c), 1,569sqm (GIA) would be occupied as Use Class E(a) (retail) equating to 29% of the total floorspace identified for Class E(a)-(c) use within the scheme. The assessment reports that based on this quantum of assumed floorspace in retail use only, the floorspace would achieve an annual turnover in the region of £3.8 million and that based on an average spending per

head by London residents on total comparison and convenience goods of c£5,900.00[5], the available expenditure from the new development (resulting from 3000 new residents) will be c.£17.7 million. As such the assessment concludes that there would be sufficient expenditure and capacity generated by the development itself to support the local scale of retail provision proposed.

7.30 In terms of restaurants and cafes, these uses will rely on turnover from a wider catchment area and therefore trade will not come entirely from the occupiers of the development. The new on-site population will generate around £4.2 million of restaurant/café expenditure based on an annual spend per head of £1,400[6] per person, a proportion of which will be spent on-site. The remainder will be drawn from the wider Isle of Dogs population, employment commuters and visitors to the area. The existing distribution of restaurants and cafes outside of Canary Wharf, in smaller district and neighbourhood centres/neighbourhood parades, is poor in this part of the Isle of Dogs.

7.31 Overall, the impact assessment confirms that the anticipated level of commercial floorspace is of an appropriate scale relative to the size of the development proposed as it will serve the day-to-day needs of future residents and workers/visitors to the site. The scale of the retail proposed will not divert spending or draw trade from the nearby Crossharbour District Centre, Barkantine Neighbourhood Centre or Manchester Road and Westferry Road Neighbourhood Parades. These centres perform their own walk-in localised shopping and service functions, whilst Crossharbour also benefits from a large food store and future redevelopment.

7.32 The remaining retail floorspace will be occupied by a range of retail service and financial business uses including, as examples: hairdressers, dry cleaners, opticians, banks/building societies, or estate agents. These are all examples of businesses serving local service needs and will not attract a significant number of shoppers from alternative destinations. The assessment anticipates that given the scale of the development, it is likely that a maximum of only 6 units will be occupied by such uses.

7.33 Overall, Officers agree with the findings of the submitted retail impact assessment and consider that the anticipated level of Class (E) retail floorspace is of an appropriate scale relative to the size of the development and will be ancillary in nature. The commercial uses proposed in the masterplan will serve a localised and site-specific need and will not form a destination that will divert trade from the nearby network of town centres. It is noted that the impact assessment has not considered Castalia Square Neighbourhood Parade, which is sited approximately 0.6 miles from the site, Officers consider that similar principles to Manchester Road and Westferry Road Neighbourhood Parades would apply in this instance and the proposed development will not impact on the functioning of this parade. Officers would seek to restrict the commercial floorspace in line with the impact assessment undertaken and this would be secured via condition.

Community Centre and Crèche

7.34 Policy S.CF1 of the Local Plan states that development should maximise opportunities for the provision of high-quality community facilities to serve a wide range of users. Where possible, facilities or services should be accessible to the wider community outside of core hours and co-located or shared to encourage multi-purpose trips and better meet the needs of different groups. The policy also goes on to state that new community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal.

7.35 The scheme proposes the provision of a community centre on the upper ground level of block W1 measuring 220.3sqm (GIA) and a crèche on the ground floor of block N1 measuring 343.6sqm (GIA). Both these uses are welcomed and supported in principle and whilst not in a town centre location, the size of these units are considered to be appropriately local in scale relative to the size of the development and will support the delivery of social cohesion in the

[5] Average spending per head reported in the Retail Impact Assessment as being retrieved from Experian.
[6] Annual spend per person reported in the Retail Impact Assessment as being retrieved from LBTH Retail and Centres Study 2023.

masterplan. In terms of the community centre, it is the Applicant's intention that this unit would be let rent-free to the eventual operator however the operator would be responsible for the running costs. These units will be constructed to shell and core and secured via the S106 legal agreement.

Use Class E(g)(i) Office

7.36 The masterplan proposes 76.5sqm of office space under Use Class E(g)(i); however, this would serve a Central Management Suite located on the ground floor of building C3 and is specific to this development. This will not be an office space that will be let on a commercial basis and therefore it is not considered that it would be appropriate to apply Local Plan policies that seek to direct office and employment uses to town centre locations or secure affordable workspace. Officers will seek to impose a condition restricting this quantum of floorspace to be used as a Management Suite only.

HOUSING

Affordable Housing

7.37 Policy H4 of the London Plan sets a strategic target for 50 per cent of all new homes delivered across London to be genuinely affordable. To secure greater security of affordable housing delivery, Policy H4 requires major developments which trigger affordable housing requirements to provide affordable housing through the 'threshold approach' to applications.

7.38 Policy H5 of the London Plan and The Mayor of London's Affordable Housing and Viability SPG (August 2017) sets out the 'threshold approach' to applications, whereby the approach to viability information depends on the level of affordable housing being provided. Applications for schemes that (a) meet or exceed 35% or 50% (on public land) affordable housing provision without public subsidy, (b) provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the relevant borough and the Mayor of London and (c) have sought to increase the level of affordable housing beyond 35% or 50% by accessing grant are not required to submit viability information.

7.39 Schemes that follow the above approach are deemed to be eligible for the 'Fast Track' route and are expected to be subject to an early viability review. However, this is normally only triggered if an agreed level of implementation is not achieved within two years of planning permission being granted.

7.40 Policy H6 of the London Plan under Part A establishes the split of affordable housing products that would be expected from proposals for residential development. It can be summarised from Part A (1-3) as a minimum of 30 per cent low-cost rented homes, a minimum of 30 per cent Intermediate products and the remaining 40 per cent to be determined by the borough as low-cost rented homes or Intermediate product based on identified needs. The policy also reiterates that Part A must be met to qualify for the 'Fast Track' route.

7.41 At the local level, Policy S.H1 of the Local Plan requires developments to contribute towards the creation of mixed and balanced communities that respond to the local and strategic need by amongst other things:

- Under Part 2(a), setting an overall target for 50% of all new homes to be affordable.
- Under Part 2(a)(iii), requiring the provision of a minimum of 35% affordable housing on sites providing 10 or more residential units (subject to viability).

7.42 Policy D.H2 of the Local Plan requires development to maximise the provision of affordable housing in accordance with a 70% affordable rent and 30% intermediate tenure split based on the number of habitable rooms.

7.43 The scheme provides 3794 habitable rooms in total (1358 units) of which 1328 habitable rooms (379 units) would be affordable representing 35% based on habitable rooms (28% based on the number of units) with the remaining 2466 habitable rooms being for private sale

representing 65%. As such, the propsal meets the policy requirement to provide at least 35% affordable housing provision onsite. The tenure split for the affordable housing element would be 70%:30% in favour of Affordable Rented units (930 habitable rooms/259 units) to Intermediate (398 habitable rooms/120 units) and therefore provides a policy-compliant tenure split in the affordable element.

7.44 In line with Policies S.H1 and D.H2 of the Local Plan the Affordable Rented units would be split 50:50 between London Affordable Rent and Tower Hamlets Living Rent. The Applicant has not provided a detailed breakdown of this; however, Officers would be seeking to secure via the S106 legal agreement an equal distribution between London Affordable Rent and Tower Hamlets Living Rent both in terms of distribution across unit numbers and occupancy levels. The rent levels for each product would be set as follows:

Number of Bedrooms	**London Affordable Rent (LAR) 2024/25 (exclusive of service charge)** **£ Per Week**	**Tower Hamlets Living Rent (THLR) 2023/2024 (inclusive of service charge)** **£ Per Week**	
		Flat	**House**
Bedsit – 1 Bed	£201.43	£250.64	£263.17
2 Bed	£213.26	£275.71	£288.24
3 Bed	£225.10	£300.77	£313.30
4 Bed	£236.95	£325.83	£338.37
5 Bed	£248.80	£350.90	£363.43
6 Bed	£260.63	£375.96	£388.49
7 Bed		£401.03	£413.56

Table 2: Rent levels of LAR and THLR homes

7.45 The Intermediate housing will consist of Shared Ownership homes whereby, typically, a tenant can purchase an initial equity share of a property of between 25% to 75%. The rent payable on the percentage of equity not owned would typically range between 0.5% - 2.75% plus service charges, with the maximum rent limit set at 3% of the value of the equity not purchased. The combination of mortgage, rent and service charge forms the purchaser's housing costs.

7.46 As set out in the Mayor of London's Affordable Housing and Viability SPG, housing costs must not exceed 40% of net household income. In addition, the gross household income threshold for home ownership is capped at £90,000. The Affordable Housing Statement confirms that the FVA included a valuation of the Intermediate homes on a Shared Ownership basis based on the GLA's maximum £90,000 household cap. The Applicant has also advised that the Intermediate product could also comprise London Living Rent product whereby eligibility for London Living Rent is restricted to households renting privately or socially with a maximum household income of £60,000.

7.47 The proposal is considered to be eligible for the 'Fast Track' route and thus the submission of a Financial Viability Appraisal is not required in this instance. The S106 legal agreement will secure the delivery of the affordable housing and the requirement for an early stage review to be triggered if an agreed level of progress on implementation is not made within 2 years of the planning permission being granted.

7.48 In conclusion, the affordable housing provision is welcomed and supported by Officers and the proposal is therefore considered to provide a policy-compliant level of affordable housing

contributing to the borough's much needed affordable housing stock consistent with the requirements of the Local Plan and national planning policy.

Housing Mix and Tenure

7.49 Policy H10 of the London Plan promotes the provision of a range of unit mix and sizes having regard to robust local evidence of need where available, to deliver mixed and inclusive neighbourhoods.

7.50 At the local level, Policy S.H1(2) of the Local Plan states that development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through, amongst other things, requiring a mix of unit sizes (including larger family homes) and tenures to meet local need on all sites providing new housing. Locally specific targets (based on the Council's most up to date Strategic Housing Market Assessment, 2017) for unit mix and sizes are set out in Part 3 of Policy D.H2 of the Local Plan.

7.51 Site Allocation 4.12 (Westferry Printworks) requires development to maximise the provision of family homes.

7.52 The proposed unit and tenure mix for the scheme is set out below in Table 3 as an assessment against Policy D.H2 of the Local Plan.

		Market Housing			**Affordable Housing**					
					Intermediate			**Social Rent/Affordable Rent**		
Unit Size	Total Units	Units	As a %	Policy Target %	Units			Units	As a %	Policy Target %
Studio	93	93	9.5%	/	/	/	/	/	/	/
1-bed	420	342	34.9%	30%	15	12.5%	15%	63	24.3%	25%
2-bed	615	487	49.7%	50%	52	43.3%	30%	76	29.3%	30%
3-bed	187	57	5.8%	20%	53	44.2%	45%	77	29.7%	30%
4-bed	43	/	/		0	/		43	16.6%	15%
Total	**1358**	**979**	**/**	**100%**	**120**	**/**	**100%**	**259**	**/**	**100%**
Hab Rooms	**3794**	**2466**			**398**			**930**		

Table 3: Proposed unit and tenure mix assessed against Policy D.H2

7.53 In the Market housing mix, there would be 9.5% studio units for which there is no policy requirement, and an over-provision of 1-bed units (+4.9%) over a policy target of 30% and a very marginal under-provision of 2-bed units. There would be a substantial under-provision of 3 and 4-bed units (-14.2%).

7.54 In the Intermediate housing mix, there would be an under-provision of 1-bed units (-2.5%), a substantial over-provision of 2-bed units (+13.3%) and a marginal under-provision of 3-4 bed units (-0.8%). It should be noted that no 4-bed Intermediate units are proposed in this tenure.

7.55 In the Affordable Rent tenure, there would be a marginal under-provision of 1-bed units (-0.7%), very marginal under-provision of 2 and 3-bed units and a marginal over-provision (1.6%) of 4-bed units.

7.56 The overall unit and tenure mix does not provide a policy-compliant mix as required by Policy D.H2 of the Local Plan particularly with regards to the shortfall in Market family housing and the over-provision of studio/1-beds in this tenure. However, Officers note that broadly policy-compliant levels of 3 and 4-bed units have been proposed in the Affordable Rent tenure. The scheme also only marginally under-provides family housing in the Intermediate tenure. This is a notable improvement in the delivery of affordable family housing on this site compared to the extant planning permission which must be considered as a fallback position (albeit on a less dense scale). The extant planning permission provided 47 affordable (Affordable Rent and Intermediate) family housing of which 8 comprised 4-bed units in the Affordable Rented tenure. In comparison, the proposed scheme will deliver 173 family-sized affordable housing units (+126 units compared to the family housing in the affordable provision in the extant planning permission) of which there would be 77 x 3-bed units and 43 x 4-bed units in the Affordable Rented tenure. This is a significant improvement in the provision of family-sized affordable housing compared to the extant planning permission.

7.57 Whilst the scheme under-provides in family housing in the Market tenure, Officers note that this scenario is not unusual in previously approved schemes within close vicinity of the site. Officers consider that the proposed unit mix provides for a range of unit types and seeks to proportion them within the tenures where there is a recognised need without compromising the submitted affordable housing offer of 35% as discussed earlier in this report. Whilst the proposal does not accord with Policy D.H2 of the Local Plan, given that there is a pressing need for larger family homes in the Affordable Rented tenure, it is considered, on balance, that the deviation from policy (in particular, the under-provision of larger family units and over-provision of studio/1-bed units in the Market tenure) would constitute an acceptable mix of homes which would cater for a range of residents within the borough at a variety of stages in their life.

7.58 When considered alongside the strong affordable housing offer which is a significant improvement on the extant planning permission (20% affordable housing secured), it is considered that the scheme will provide for a variety of high-standard and diverse accommodation. The location of the affordable blocks are indicated in the image below.

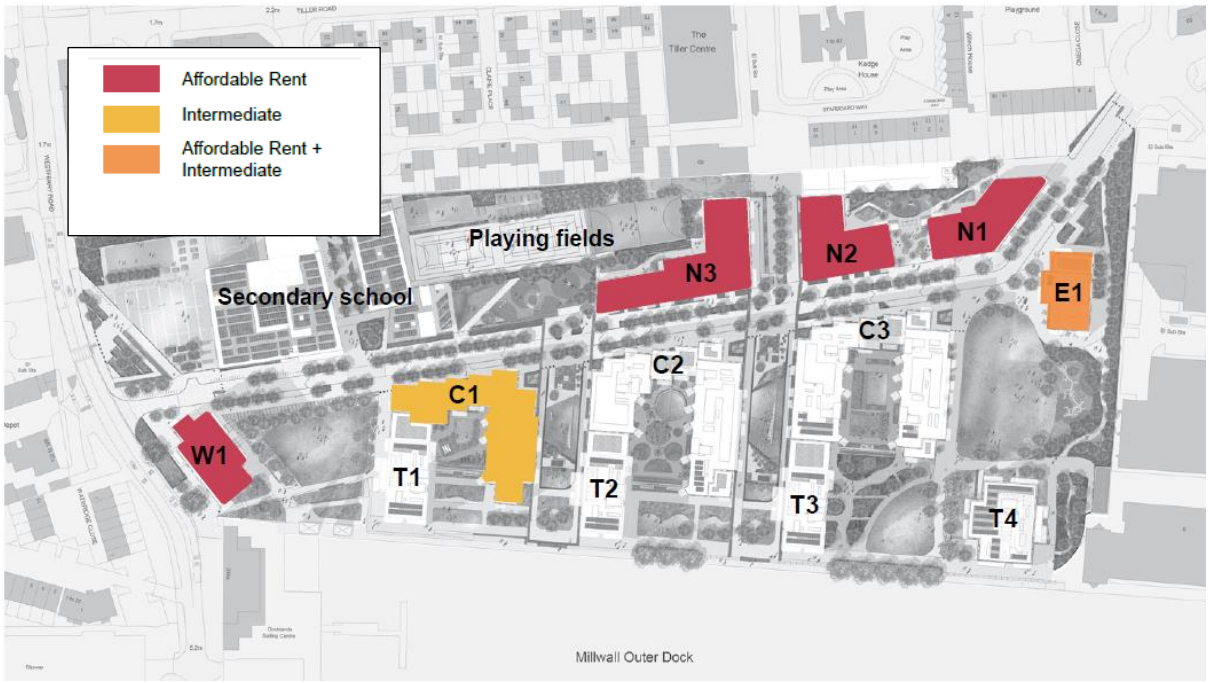

Figure 11: Location of Affordable Housing Blocks

QUALITY OF RESIDENTIAL ACCOMMODATION

7.59 Policy D6 of the London Plan sets the expected minimum internal space standard required within new dwellings across all tenures. Policy D6 incorporates the Nationally Described Space Standards (NDSS) and sets out requirements for the gross internal area (GIA) of all

new dwellings at a defined level of occupancy, as well as areas and dimensions for key parts of the home, notably bedrooms, storage and floor-to-ceiling heights.

7.60 The standards seek to ensure that, amongst other things, new homes have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners without differentiating between tenures.

7.61 The above requirements are reflected at the local level in Policy D.H3 of the Local Plan which seeks to ensure that all new residential units meet the minimum standards prescribed within the London Plan.

Housing Standards

7.62 All the homes will be designed to exceed the NDSS in terms of Gross Internal Area, bedroom sizes and access to direct private amenity space in the form of balconies and therefore the proposal complies with the London Plan in this regard.

Layout and Circulation

7.63 Design Standard B2.5 of the Mayor of London's Housing Design Guide states that the number of homes accessed by a core should not exceed eight per floor. Deviation (by exception) from this standard will need to be justified and mitigated by increasing the corridor widths to 1800mm, locating homes on both sides of the core and introducing intermediate doors to create sub-clusters.

7.64 In respect of this application, the courtyard blocks have eastern and western wings whereby there are more than 8 homes arranged around long double-banked corridors. However, these wings are served by at least 2 cores, each accessible from its own residential lobby. As such, this would negate the need for a person(s) to travel a considerable distance to reach a unit within a particular block. Similarly, Block N3, which is an 'L' shaped block with a long double-banked corridor, is served by 2 cores each with its own residential lobby. In addition, there is a break in the corridor in the form of an internal door which allows one core to serve 6 flats and the other core to serve 5 flats (Levels 01-08). On level 9 of this block, the internal door will mean that one block will serve 4 flats whilst the second core will serve 4 flats. These are considered to be compliant with policy.

7.65 Blocks N1, N2, E1, W1 and all the tower blocks are served by no more than 8 units per core and therefore fully policy-compliant. Overall, in consideration of the individual circumstances of the blocks detailed above, Officers find the internal arrangement and layout for the development to be acceptable.

Aspect, Privacy and Outlook

<u>Aspect and Outlook</u>:

7.66 Policy D6 (Part C) of the London Plan states housing developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. The masterplan includes 756 units which meet the definition of 'dual aspect' as detailed in the London Plan Guidance: Housing Design Standards (June 2023). This would be equivalent to 56% of all the units within the masterplan. An additional 318 units (equivalent to 23%) are described in the submitted Design and Access Statement as 'enhanced single-aspect' units. These units, whilst not fully dual aspect (i.e. with opening windows on two external walls), incorporate aspect on a separate elevation (albeit usually where there is a corner return). However, the new London Plan Guidance is clear that where dwellings have opening windows on two adjacent sides, these can only be defined as dual aspect if the window opening/s are situated at least halfway down the depth of the dwelling. Where an aspect is facing a neighbouring wall, this aspect can only be considered as a dual aspect if the separation distance between this aspect and a neighbouring wall is the same or greater than the distance from the outer corner of the wall to the inner most edge of the window.

7.67 The breakdown of the aspect distribution is indicated in the table below. As can be seen there would be 21% single aspect units however it should be noted that none of these are north-facing.

	Unit numbers	Unit %
Single Aspect	284	21%
Enhanced Single	318	23%
Dual Aspect	756	56%
Total	1,358	100%

Table 4: Aspect breakdown across development

7.68 The submitted Design and Access Statement also details that the units identified as 'enhanced single aspect' would have met the criteria for 'dual-aspect' prior to the Housing Design Standards LPG being published and the scheme would have provided around 80% dual aspect based on the previous definition. On balance, Officers accept that the scheme has sought to maximise dual aspect units, noting that the scheme adopts the masterplan layout principles of the extant planning permission.

7.69 It should be noted that the extant planning permission secured 62% dual aspect units. However, this was a larger percentage (equating to 447 units) in a scheme with less density (722 units). As detailed above, the 56% dual aspect units proposed under the current proposal equates to 756 units and as such is a significant increase in the provision of dual aspect units being delivered on the site.

Privacy and Outlook within the Development:

7.70 Policy D.DH8 of the Local Plan seeks to protect amenity and requires 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 achieve this, developments must, amongst other things, maintain good levels of privacy and avoid an unreasonable level of overlooking or unacceptable increase in the sense of enclosure. Explanatory paragraph 8.86 to this policy notes that with specific regards to overlooking, a distance of approximately 18 metres between windows of habitable rooms reduces inter-visibility to a degree acceptable to most people. This figure will be applied as a guideline depending upon the design and layout of the development.

7.71 The scheme adopts the same masterplan principles as the extant planning permission thus separation distances between buildings within the masterplan are broadly comparable. There would be a separation distance of 63m between towers T1 and T2 and between T2 and T3 and a separation distance of 57m between towers T3 and T4. Buildings E1, W1 and tower T4 will have sufficient separation distances from the nearest buildings to them within the masterplan: i.e. building E1 will be separated by at least 18m from building N1 and approximately 39m and 62m from buildings C3 and T4 respectively. Building W1 will have a separation distance of approximately 47m from tower T1 and there will be some 18-19m distance from the north-eastern corner of building W1 to the south-western corner of the school building. The courtyard buildings will have separation distances across the podiums (between elevations incorporating habitable room windows) ranging between approximately 22-24m.

7.72 Place Shaping Officers have raised concerns with regards to the relationship between the courtyard buildings (C1-C3) and towers T1-T3 and in particular the separation distances between the southern facades of the western wings of each courtyard building and the northern facades of tower T1-T3. The close proximity of these buildings has resulted in a distance of approximately 8m and in some instances, based on the submitted plans, windows of habitable rooms facing each other, thus resulting in the potential loss of privacy and overlooking for future occupiers of the development.. The Applicant has subsequently amended the plans to angle windows on the courtyard buildings so that they do not directly face windows on the northern facades of the tower buildings. An example of the amendments to the submitted plans to address potential overlooking and loss of privacy can be seen in the image below.

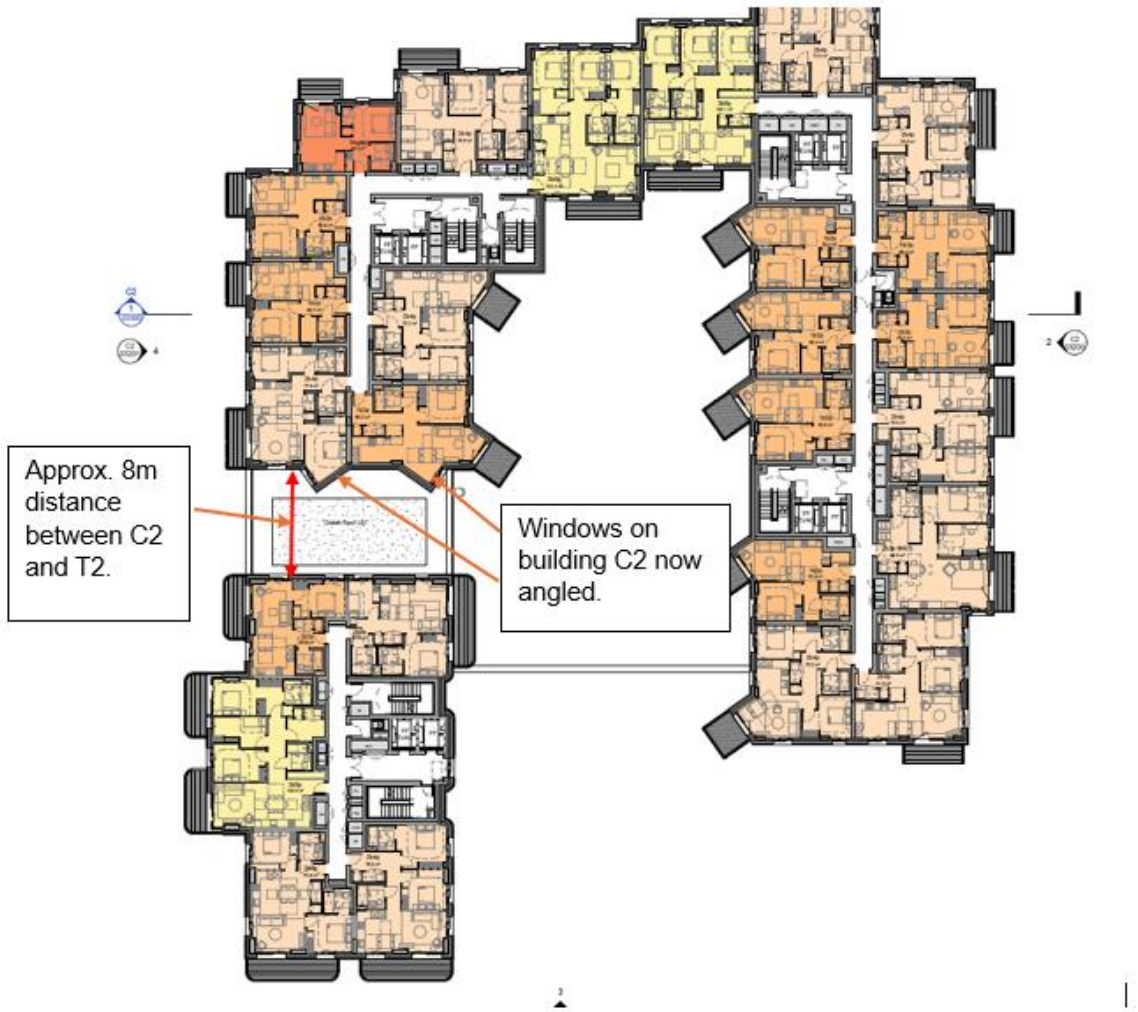

Figure 12: Amendments to scheme to address privacy impacts

7.73 In terms of the cluster of buildings in the northern part of the site (N1-N3), these buildings will have separation distances of approximately 16m between buildings N1 and N2 and 21 metres between N2 and N3. It is noted there would be habitable rooms facing each other in the distance between N1 and N2 but overall, Officers are satisfied that building plots within the masterplan would generally achieve acceptable levels of outlooking and privacy and provide generous distances between buildings. Whilst there are instances of the separation distances between habitable rooms falling below 18m, on balance Officers consider that the proposal overall is acceptable in this regard taking account of the site's location within an Opportunity Area, where there is an expectation that high density development will be delivered, and site capacity optimised in pursuit of wider regeneration benefits.

Wheelchair Accessible Housing

7.74 Policy D7 of the London Plan requires residential developments to provide at least 10% of dwellings that meet Part M4(3) (wheelchair user dwellings) and all other dwellings (90%) should meet requirement Part M4(2) (accessible and adaptable dwellings) of the Building Regulations Approved Document M: *Access to and use of buildings.*

7.75 Policy D.H3 of the Local Plan requires the same provision as the London Plan. However, supporting paragraph 9.44 clarifies that all 'wheelchair user dwellings' in the Affordable Rented tenure should meet Part M4(3)(2)(b); i.e., built to fully accessible standards and capable for immediate occupation rather than adaptable for wheelchair users (Part M4(3)(2)(a)).

7.76 The submitted Design and Access Statement confirms that, across the development, the scheme would provide 90% M4(2) units (1222 units) and 10% M4(3) units (136 units) in accordance with the London Plan.

7.77 The breakdown of the M4(3) units across the development is detailed in the table below.

Building Plot	Tenure of M4(3) Units	Number of M4(3) Units	Occupancy Level
T1	Market	12	1B2P
T2	Market	16	1B2P
T3	Market	20	1B2P
T4	Market	14	2B3P
T4	Market	8	1B2P
C1	Intermediate	6	2B3P
C2	Market	9	2B3P
C3	Market	6	3B6P
C3	Market	10	2B3P
E1	Intermediate (x5) Affordable Rent (x3)	8	3B5P
W1	Affordable Rent	9	2B3P
W1	Affordable Rent	1	2B4P
N1	Affordable Rent	8	3B4P
N1	Affordable Rent	9	4B5P
Total		**136**	

Table 5: Breakdown of M4(3) units

7.78 Overall, the provision of M4(2) and M4(3) units within the development is acceptable and welcomed, noting that there is a good distribution of the M4(3) units across all tenures and a

range of occupancy levels. Full details of compliant accessible and adaptable layouts including the provision of fully adapted (M4(3)(2)(b)) units in the Affordable Rented tenure would be secured via condition and the S106 legal agreement should planning permission be granted.

Communal Amenity Space

7.79 Policy D.H3 (Part C) of the Local Plan requires that for major developments (10 residential units or more) communal amenity space should be provided. The provision should be calculated based on 50sqm for the first 10 units with an additional 1sqm for every additional unit thereafter. Based on 1,358 units, the development is required to provide a minimum of 1,398sqm of communal amenity space.

7.80 The scheme proposes 6,371.3 sqm of communal amenity space across the masterplan which substantially exceeds the policy requirement of 1,358sqm. The communal amenity space strategy includes the provision of external areas of amenity space for buildings or shared between buildings, internal and external areas at podium level of the courtyard buildings and internal areas of communal amenity space in selected buildings.

7.81 A 'Central Hub' measuring 1,649.3sqm in area is proposed at ground floor and basement level of courtyard block C3 which provides market units (T1-T4 and C2-C3) with a range of community amenity spaces and provisions including a lounge, library, multi-function screening room, gym, spinning studio and squash court.

7.82 The general distribution of the proposed communal amenity areas including the indicative quantum of communal amenity space designated to each building plot across the masterplan can be seen in the images below.

Figure 12: Distribution of communal amenity space

7.83 It is apparent from the communal amenity space strategy that this heavily favours the market units with only 1,024.3sqm of the total communal amenity provision dedicated to the Affordable Rent and Intermediate blocks. A further 431.0sqm of communal amenity space is identified as being shared between the Market building T1 and Intermediate building C1. The majority of communal amenity space for the affordable blocks will largely consist of internal areas of residential amenities within the mezzanine levels of courtyard block C1 and the gateway

building E1. The provision allocated to building E1 equates to 66.2sqm. Areas of external communal amenity space for the affordable blocks will be provided at podium level and shared between buildings N1 and N2 and to the rear of building N3. The area proposed to the rear of building N3 is particularly constrained by the boundary of the school site and appears to also serve as an access route to the crèche which is located at ground floor level of building N3. Given the fact that this communal amenity area is somewhat 'squeezed' in between the boundary of the school site and building N3, and will be overlooked by users of the creche and serve as an access route, it is questionable whether this communal amenity area will be perceived or even used as communal amenity space. This is clearly a disadvantage of the scheme.

7.84 In response to the above, the Applicant has submitted a supporting note which further clarifies how the external communal amenity spaces are intended to be used. The supplementary note states that the two semi-private residential courtyards to the north buildings should provide quiet spaces and spaces for families to meet. The look and feel, character and function of these spaces should differ from the wider public realm. These external communal spaces are north-facing; however, it is suggested that these spaces will incorporate high-quality hard landscape material and planting and provide opportunities to occupy the spaces differently from picnics on lawns with individual spaces for reading and relaxation and collective outdoor dining opportunities. It is noted however that the quantum of communal amenity space proposed for the podium level external communal amenity area between buildings N1 and N2 appears to include areas of dedicated children's play (205sqm) and this is technically double-counting areas of communal amenity with children's play.

7.85 In terms of the communal amenity space allocated at podium level north of building N3, the Applicant's supporting landscape and public realm note submitted in respect of the northern buildings states that this would be a linear space that edges the sports pitch associated with the school. This interface would be planted with evergreen shrubs, seasonal perennial planting and trees to dampen the noise and to provide a visual separation from the sports pitch. The space includes a linear play trail with stepping logs, balancing beams and similar play equipment (it is noted that in this instance, the play area appears to be excluded from the communal amenity area calculation). The edges that define the raised planter adjacent to the sports court will be retained with circular logs in varying heights, which will double as a balancing edge for children. Benches are provided adjacent to the surfaced play zones and a linear lawn edges one of the play zones and will afford small community gatherings. A decorative fence will separate the semi-private courtyard from the adjacent crèche which will include its own play area and lawn with planting and trees to create a visual separation from the adjacent sports pitch. Illustrations of the communal amenity area to the north of building N3 are indicated below.

Figure 13: Illustration of communal amenity space to building N3.

7.86 Officers still consider that it is questionable whether the communal amenity area proposed to the north of block N3 has been designed to sufficiently facilitate the use of the space for the purposes of communal amenity. The space appears to be led by play features which suggests that its predominant use would be for play provision (notwithstanding that it has been allocated as communal amenity space). Supporting paragraph 9.49 to Policy D.H3 of the Local Plan states that in considering the design and layout of communal space, it is important that this space in integrated into the overall design of the development and the wider public realm. The design should ensure that communal space is overlooked and supports a range of activities including space for relaxation, gardening, urban agriculture and opportunities to promote biodiversity, ecology and intergenerational community cohesion. It is debatable, based on the current proposals for this particular communal amenity area, whether this is truly being achieved, particularly given that the majority of the communal amenity provision across the masterplan appears to heavily favour the market units.

7.87 Notwithstanding the above, the final details of the communal amenity areas will be secured via condition which will ensure that the communal amenity areas are designed in a manner which facilitates and encourages social cohesion and integration. It is also noted that the quantum of communal amenity space allocated to the affordable blocks would exceed the communal amenity provision required were the quantum of affordable residential units to be considered in isolation (i.e. 379 affordable units would require 419sqm of communal amenity space). The quantum of communal amenity space allocated to the affordable blocks (C1, E1, W1, N1-N3) would be at least 1024.3sqm which, even discounting the 205sqm of play space in the communal amenity area between blocks N1 and N2, comfortably exceeds 419sqm.

7.88 Overall, given that the overall quantum of communal amenity space substantially exceeds the minimum policy requirement and having regards to the wider regeneration benefits of the scheme, Officers consider on balance that the proposed communal amenity space strategy for the masterplan is acceptable. The Applicant has also agreed to include within the S.106 agreement an obligation that will require the submission of an Amenities Strategy which will detail how occupiers of the affordable housing units will be charged for access to and use of pay-to-use amenities should they elect to pay for such amenities.

Children's Play Space

7.89 Policy S4 of the London Plan seeks to ensure that development proposals that include housing make provision for good quality accessible play and informal recreation and enable children

and young people to be independently mobile. Areas of play should provide a stimulating environment, be accessible in a safe manner from the street by children and young people, form an integral part of the surrounding neighbourhood, incorporate trees and/or other forms of greenery, be overlooked to enable passive surveillance and not be segregated by tenure. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Recreation sets out guidance to assist in this process.

7.90 At the local level, Policy D.H3 of the Local Plan requires major developments to provide a minimum of 10sqm of high-quality play space for each child. The Tower Hamlets child yield calculator should be used to determine child numbers in a development. Using the Tower Hamlets Play Space Calculator, the scheme would generate a child yield of 554 children.

7.91 The minimum required associated children's play according to age group and the provision proposed based on 1,358 units as set out in planning application submission is set out in the table below:

Age Group	Child Yield	Area Required (sqm)	Sqm Play Area Proposed
Aged 0-4	213	2131	2473
Aged 5-11	174	1737	1818
Aged 12-18	167	1670	2181
All Ages Combined	N/A	N/A	284
Total	**563**	**5538**	**6756**

Table 6: Child yield and required and proposed play space provision

7.92 The distribution of dedicated/formal play and informal play across the masterplan can be seen in the image below as set out in the Design and Access Planning Addendum Report (May 2024):

	Planning Scheme Requirement m2 (GLA)	Planning Scheme Provision m2
TOTAL	5,634	6,756
Under 5	2166	1,551 Formal Play 922 Informal Play =Total 2473
5-11	1767	1818 Formal Play 0 Informal Play =Total 1818
12+	1701	1378 Formal Play 803 Informal Play =Total 2181
All ages playable	0	284

Figure 14: Distribution of play space according to age.

7.93 The scheme proposes 6756sqm of children's play of which 4,747sqm will comprise formal play and 1,725sqm of informal play. In addition to this there would be 284sqm of play to cater for all age groups. Areas identified as formal play will be fixed children's play whilst areas identified as informal play (i.e. lawn areas with no fixed play equipment, sculptural elements, gym equipment for older children) will largely comprise playable landscape.

7.94 However, 1,997sqm of the total provision comprises the MUGAs and sports pitch within the school grounds. Of this quantum, 1,082sqm is proposed to be allocated for 12+ years and 915sqm to be allocated to 5-11 year olds. Officers do not consider that it is appropriate to include these areas of play in the overall play space calculation. These spaces could only be used outside of school opening times and in accordance with restrictions that would be imposed by the school. They could therefore only be used during a short period of the day/evening and in a managed and organised manner. The design of these spaces as MUGAs and a sports pitch would also dictate how they can be used, i.e. likely to be sports focused and require a booking system (with fees likely to be payable). Officers consider that whilst these facilities provide undeniable benefits to the wider masterplan it is simply not acceptable or justifiable to include them as counting towards the children's play provision.

7.95 On this basis Officers disagree with the Applicant's position that the scheme delivers policy-compliant levels of children's play space and discounting these areas means that the scheme provides 4,759sqm of children's play which falls 779sqm below the minimum 5,538sqm of play provision required and is therefore contrary to Policies S4 of the London Plan and D.H3 of the Local Plan.

7.96 Whilst there would be a deficit in play provision in quantum terms, the supporting Design and Access Statement illustrates that elsewhere across the masterplan there would be a range of different spaces, comprising different character areas to meet different needs. An example of this is Boulevard Green which is discussed in more detail in the public open space section of this report.

7.97 Boulevard Green is a south-facing space located directly south of the school pitch areas. The design of this space will include generous play space for different age groups edged by seating and planting. A single play feature, such as a stacked timber play element, is proposed to be the main feature of the play space. Smaller elements such as jumping logs, natural play boulders and a small sand play area is proposed to be included.

7.98 The eastern and west spines have been identified within the masterplan as areas that would accommodate informal play. These spaces connect the promenade through the site to the east/west Boulevard to the north. It is intended that these spaces provide areas of activity for the use of residents and commercial tenants and visitors to the site. Areas of informal play could include table tennis and lawn games.

7.99 Within Park East, there would be a dedicated destination children's playground which would accommodate climbing and balancing play equipment as well as lawn areas to accommodate play for children aged up to 11 years.

7.100 Overall, whilst the play strategy for the masterplan does not provide the minimum policy-compliant quantum of play provision and would not be in accordance with relevant development plan policies, the scheme is considered to comply with the development plan as a whole. Officers consider that the scheme generally provides a considered approach to the play strategy across the rest of the masterplan, ensuring that all forms of play have been designed to be safe, secure and well-overlooked and the quality of play ensures that there are opportunities for socialising and playing. Whilst Officers are not including the MUGAs and sports pitch as forming the quantum of play provision, it is recognised that these areas provide benefits to occupiers of the development. Officers consider that in this instance greater weight should be given to the wider regeneration benefits of the scheme. On balance, Officers find the proposed play provision acceptable. The detailed elements of the play areas would be secured via the imposition of a suitable condition should planning permission be granted for this development.

Daylight, Sunlight & Overshadowing (Proposed Development)

7.101 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) guide to good practice 'Site Layout Planning for Daylight and Sunlight' (2022) ("BR 209"). The updated guidance replaces the previous primary method of assessment of new build accommodation through calculating the average daylight factor (ADF) and No Sky Line (NSL). The BRE sets out the methods for assessing daylight within a proposed building based on methods detailed in BS EN 17037: 2018 "Daylight in buildings", the UK National Annex of the British Standard and the CIBSE publication LG 10 'Daylighting – a guide for designers (2014)'.

7.102 BS EN 17307 suggests two possible methodologies for appraising daylight in habitable rooms in dwellings:

- Illuminance Method/Target Illuminance Method (TI)
- Daylight Factor Method (DF)

7.103 The illuminance method involves using climatic data for the location of the site to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at a minimum hourly interval for a typical year. The UK National Annex provides minimum illuminance recommendations for daylight provision within UK dwellings as follows: 100 lux for bedrooms, 150 lux for living rooms and 200 lux for kitchens. These recommendations are

based upon the median illuminances that should be achieved over at least 50% of the assessment grid for at least 50% of the daylight hours over the course of the calendar year.

7.104 The BRE guidance specifies, however, that where a room has a shared use, the highest target should apply. For example, in a bed-sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities may use discretion; for example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design.

7.105 The Daylight Factor Method involves calculating daylight factors at each calculation point on the assessment grid. The daylight factor assessment uses an overcast sky model rather than climate-based data and does not take account of the potential for sunlight or the orientation of a particular room. The BRE guidelines provide equivalent daylight factor values to the lux values set out earlier for different locations with the ratio expressed as a percentage as follows: 0.7% for bedrooms, 1.1% for living rooms and 1.4% for kitchens. These percentages are based upon the median daylight factors that should be achieved over at least 50% of the assessment grid.

7.106 With regards to the assessment of sunlight, the BRE guidance requires that the minimum duration of sunlight exposure in internal spaces should be to receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st February and 21st March with cloudless conditions. The BRE guidance recommends that the test date should be 21st March and that at least one habitable room, preferably a main living room, should achieve at least the minimum criterion. The criterion applies to rooms of all orientations, although the guidance notes that if a room faces significantly north of due east or west, it is unlikely to be met. In general, a dwelling which has a particular requirement for sunlight will appear reasonably sunlit if at least one main window faces within 90 degrees due south and a habitable room, preferably a living room, can receive a total of at least 1.5 hours of sunlight on 21st March.

7.107 The Applicant has submitted an Internal Daylight and Sunlight report outside of the Environmental Statement which has been prepared by Anstey Horne Chartered Surveyors. Following minor amendments to the planning application, an Addendum Report was submitted in May 2024. The assessment and the Addendum Report have been reviewed independently by Delva Patman Redler (DPR).

Assessment of Daylight Against BRE Guidance

7.108 In calculating the daylight availability to the proposed habitable rooms, the following values were applied:

- Glazing transmittance: 0.68.
- Window area measured from 3D model.
- Maintenance factor (effects of dirt on glass): 0.92 (i.e. 8% loss) for vertical glazing, 0.76 (i.e. 24% loss) below balconies/overhangs.
- Reflectance of room finishes: Internal Ceilings (0.80), Internal Walls (0.80) and Internal Floors (0.4).

7.109 When interpreting the above, the assessment assumes light finishes comprising white ceilings (0.8 reflectance), pale cream walls (0.8 reflectance) and light wood floors (0.4 reflectance). This means that the daylight results are the best-case values and if the scheme delivers units with darker finishes, this will impact on the minimum recommended daylight factor/lux levels.

7.110 Open plan living/kitchen/diners (LKDs) have been assessed against the higher 200 lux kitchen target and DPR have advised that this is not an uncommon approach in dense residential developments, where a flexible application of BRE guidelines is considered to be reasonable and justified.

7.111 In terms of the assessment, the report states that daylight and sunlight have been assessed for a representative selection of habitable rooms with a reasonable horizontal and vertical

spread through the proposed development, including rooms at the lowest residential floor within each of the proposed blocks and alternate floors thereafter. This approach has been confirmed by DPR as being acceptable.

7.112 In total, 1,975 of the 3,794 habitable rooms (equating to a sample of 52% of habitable rooms assessed) across the scheme have been assessed and the results suggest that 1,409 (71%) of the 1,975 habitable rooms will satisfy or exceed the minimum recommended illuminance targets. The target illuminance results are summarised in more detail on a block-by-block basis below.

Block E1

7.113 The assessment reports that out of 98 rooms assessed (28 LKDs and 70 bedrooms), 86 rooms (88%) would achieve illuminance levels that meet or exceed the minimum suggested guidelines. The remaining 12 rooms include 10 LKDs and 2 bedrooms on the first to eleventh floors. Five of the rooms that fall short of the guidelines achieve the suggested lux levels to over 44% of their areas against the 50% guideline. The majority of the rooms that fall short also have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.114 In addition to the assessment of the LKDs against the 200 lux guideline for a kitchen, the report has also assessed the LKDs against the 150 lux guideline for a living room. The results demonstrate that when assessed against the 200 lux guideline, 18 (64%) of the 28 LKDs will meet or exceed recommended lux level. When assessed against the 150 lux guideline, 24 (86%) of the LKDs will meet or exceed the recommended lux level.

7.115 Overall, the daylight results in Block E1 show a good level of adherence to the BRE guidelines.

Block N1

7.116 The results of the assessment for daylight indicates that out of 82 rooms assessed (24 LKDs, 2 living rooms, 2 KDs and 54 bedrooms), 62 rooms (76%) would achieve illuminance levels that meet or exceed the minimum recommended BRE guidelines. The remaining 20 rooms include 1 KD, 13 LKDs and 6 bedrooms on the first to seventh floors. Two of the rooms that fall short achieve the suggested lux levels to over 40% of their areas against the target of 50%. The majority of the rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies on the floor above.

7.117 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 11 (46%) of the 24 LKDs are shown to meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 14 (58%) of the LKDs would meet or exceed the recommended lux level.

7.118 Overall, the daylight results in Block N1 show a good level of adherence to the BRE guidelines.

Block N2

7.119 The daylight assessment results indicate that out of the 130 rooms assessed (15 LKDs, 14 living rooms, 14 kitchen/dining rooms and 87 bedrooms), 66 rooms (51%) would achieve illuminance levels that meet or exceed the minimum recommended BRE guidelines. The remaining 64 rooms include 10 LKDs, 2 living rooms, 12 KDs and 40 bedrooms on the first to seventh floors. Three of the rooms that fall short achieve the suggested lux levels to over 44% of their areas against the target of 50%. A number of the rooms that fall short either have direct access to a balcony or are located next to a room served by a balcony and therefore their windows are obstructed by the projection of the balcony.

7.120 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 5 (33%)

of the 15 LKDs are shown to meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 6 (40%) of the LKDs are shown to meet or exceed the recommended lux level.

7.121 Overall, the daylight results in Block N2 show a reasonable level of adherence to the BRE guidelines.

Block N3

7.122 The daylight assessment results indicate that out of the 194 rooms assessed (41 LKDs, 11 living rooms, 11 kitchen/dining rooms and 131 bedrooms), 136 rooms (70%) would achieve illuminance levels that meet or exceed the minimum recommended BRE guidelines. The remaining rooms include 25 LKDs and 33 bedrooms on the first to seventh floors. Six of the rooms that fall short achieve the suggested lux levels to over 42% of their areas against the target of 50%. The majority of the rooms that fall short either have direct access to a balcony or are adjacent to a room served by a balcony.

7.123 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 16 (39%) of the 41 LKDs are shown to meet or exceed the recommended lux level. When assessed against 150 lux guideline, 19 (46%) of the LKDs are shown to meet or exceed the recommended lux level.

7.124 Overall, the daylight results in Block N3 show a good level of adherence to the BRE guidelines.

Block W1

7.125 The daylight assessment results indicate that out of the 89 rooms assessed (31 LKDs and 58 bedrooms), 84 rooms (94%) would achieve illuminance levels that meet or exceed the minimum suggested guidelines as set out by the BRE. The remaining 5 rooms are LKDs on the first to seventh floors. Three of the rooms that fall short achieve the suggested lux levels to over 42% of their areas against the target of 50%. All of the rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.126 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 26 (84%) of the 31 LKDs are shown to meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 30 (97%) of the LKDs are shown to meet or exceed the recommended lux level.

7.127 Overall, the daylight results in Block W1 show a good level of adherence to the BRE guidelines.

Block T1

7.128 The daylight assessment results indicate that out of the 129 rooms assessed (45 LKDs, 6 studios and 78 bedrooms), 112 rooms (87%) would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 17 rooms include 6 LKDs and 11 bedrooms on the first to fifth floors. Seven of the rooms that fall short achieve lux levels to at least 40% of their areas against the target of 50%. The majority of the rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.129 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 39 (87%) of the 45 LKDs are shown to meet or exceed the recommended lux level. When assessed

against the 150 lux guideline, 42 (93%) of the LKDs are shown to meet or exceed the recommended lux level.

7.130 Overall, the daylight results in Block T1 show a good level of adherence to the BRE guidelines.

Block C1

7.131 The daylight assessment results indicate that out of the 120 rooms assessed (38 LKDs and 82 bedrooms), 70 rooms (58%) would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 50 rooms include 18 LKDs and 32 bedrooms on the first to seventh floors. Six of the rooms that fall short achieve lux levels to at least 40% of their areas against the target of 50%. The majority of the rooms that fall short either have direct access to a balcony or are adjacent to a room served by a balcony.

7.132 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 20 (53%) of the 38 (LKDs) are shown to meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 25 (66%) of the LKDs are shown to meet or exceed the recommended lux level.

7.133 Overall, the daylight results in Block C1 show a reasonable level of adherence to the BRE guidelines.

Block T2

7.134 The daylight assessment results indicate that out of the 157 rooms assessed (55 LKDs, 8 studios and 94 bedrooms), 134 rooms (85%) would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 23 rooms include 10 LKDs and 13 bedrooms on the first to seventh floors. The majority of the rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floors above.

7.135 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 45 (82%) of the 55 LKDs meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 45 (82%) of the LKDs meet or exceed the recommended lux level.

7.136 Overall, the daylight results in Block T2 show a good level of adherence to the BRE guidelines.

Block C2

7.137 The daylight assessment results indicate that out of the 224 rooms assessed (86 LKDs, 4 studios and 134 bedrooms), 79 (35%) rooms would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 145 rooms include 66 LKDs, 2 studios and 77 bedrooms on the first to the ninth floors. Seventeen of the rooms that fall short achieve lux levels to over 40% of their areas against the target of 50%. The rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.138 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 20 (23%) of the 86 LKDs meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 32 (37%) of the LKDs would meet or exceed the recommended lux level.

7.139 Overall, the daylight results in Block C2 show a reasonable level of adherence to the BRE guidelines.

Block T3

7.140 The daylight assessment results indicate that out of the 185 rooms assessed (65 LKDs, 10 studios and 110 bedrooms), 163 rooms (88%) would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 22 rooms include 11 LKDs, 1 studio and 10 bedrooms on the first to seventh floors. Of the rooms that fall short, 1 achieves lux levels to over 45% of their areas against the target of 50%. The majority of the rooms which fall short of the guideline values have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.141 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 54 (83%) of the 65 LKDs meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 56 (86%) of the LKDs meet or exceed the recommended lux level.

7.142 Overall, the daylight results in Block T3 show a good level of adherence to the BRE guidelines.

Block C3

7.143 The daylight assessment results indicate that out of the 279 rooms assessed (101 LKDs, 10 studios and 168 bedrooms), 140 rooms (50%) would achieve illuminance levels that meet or exceed the minimum BRE guidelines. The remaining 139 rooms include 71 LKDs, 7 studios and 61 bedrooms on the first to the ninth floors. Twenty five of the rooms that fall short achieve lux levels to over 40% of their areas against the target of 50%. Many of the rooms that fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.144 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 30 (30%) of the 101 LKDs would meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 47 (47%) of the LKDs would meet or exceed the recommended lux level.

7.145 Overall, the daylight results in Block C3 show a reasonable level of adherence to the BRE guidelines.

Block T4

7.146 The daylight assessment results indicate that out of the 288 rooms assessed (103 LKDs, 10 studios and 175 bedrooms), 278 rooms (97%) would achieve illuminance levels that meet or exceed the minimum recommended BRE guidelines. The remaining 10 rooms include 3 LKDs and 5 studios and 2 bedrooms on the first to ninth floors. Six of the rooms that fall short achieve lux levels to over 40% of their areas against the target of 50%. The majority of the rooms which fall short have direct access to a balcony and their main windows are oversailed by balconies serving the floor above.

7.147 The report has also assessed the LKDs against the 150 lux guideline for a living room and compared the results with the assessment of the LKDs against the 200 lux guideline for a kitchen. The results demonstrate that when assessed against the 200 lux guideline, 100 (97%) of the 103 LKDs meet or exceed the recommended lux level. When assessed against the 150 lux guideline, 103 (100%) of the LKDs meet or exceed the recommended lux level.

7.148 Overall, the daylight results in Block T4 show a good level of adherence to the BRE guidelines.

Assessment of Sunlight Against BRE Guidance

7.149 In terms of sunlight, a total of 1,975 rooms were assessed which include 707 main living rooms (including rooms containing the main living area, such as a living/kitchen/dining room). The results include the assessment of sunlight available to all windows in rooms tested. As noted

earlier, the BRE guidelines recognise that if a room faces significantly north of due east or west the sunlight criterion is unlikely to be met.

7.150 The result of the assessment demonstrates that 962 (49%) of the 1,975 rooms assessed achieve or exceed the BRE guidelines for sunlight exposure. 577 (29%) of the 1,975 rooms assessed achieve or exceed the APSH (Annual Probable Sunlight Hours) on an annual basis and 851 (43%) achieve the guidelines on a winter basis. The results are summarised in more detail below on a block-by-block basis.

Block E1

7.151 The sunlight assessment results demonstrate that 75 (77%) of the 98 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 21 south-facing LKDs assessed, all (100%) would meet the guidelines for sunlight exposure, with 17 of these rooms meeting the BRE's high rating.

7.152 The APSH results for this block confirm that 60 (61%) of the 98 rooms assessed would achieve the guideline values on an annual basis and 50 (51%) would achieve the guideline values on a winter basis.

7.153 Overall, the sunlight results in Block E1 show a good level of adherence to the BRE guidelines.

Block N1

7.154 The sunlight assessment results demonstrate that 30 (37%) of the 82 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows 90 degrees of due south confirm that, of the 24 south-facing LKDs assessed, 10 (46%) would meet the guidelines for sunlight exposure.

7.155 The APSH results for this block confirm that 18 (22%) of the 82 rooms assessed would achieve the guideline values on an annual basis and 38 (46%) would achieve the guideline values on a winter basis.

7.156 Overall, the sunlight results in Block N1 show a reasonable level of adherence to the BRE guidelines.

Block N2

7.157 The sunlight assessment results demonstrate that 40 (31%) of the 130 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows 90 degrees of due south confirm that, of the 22 south-facing LKDs and living rooms assessed, 14 (64%) would meet the guidelines for sunlight exposure.

7.158 The APSH results for this block confirm that 23 (18%) of the 130 rooms assessed would achieve the guideline values on an annual basis and 19 (15%) would achieve the guideline values on a winter basis.

7.159 Overall, the sunlight results in Block N2 show a reasonable level of adherence to the BRE guidelines.

Block N3

7.160 The sunlight assessment results demonstrate that 65 (34%) of the 194 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees of due south confirm that, of the 45 south-facing LKDs and living rooms assessed, 18 (40%) would meet the guidelines for sunlight exposure.

7.161 The APSH results for this block confirm that 41 (21%) of the 194 rooms assessed would achieve the guideline values on an annual basis and 36 (19%) would achieve the guideline values on a winter basis.

7.162 Overall, the sunlight results in Block N3 show a reasonable level of adherence to the BRE guidelines.

Block W1

7.163 The sunlight assessment results demonstrate that 50 (56%) of the 89 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that all (100%) of the 25 south-facing LKDs assessed would meet the guideline values.

7.164 The APSH results for this block confirm that 45 (51%) of the 89 rooms assessed would achieve guideline values on an annual basis and 50 (56%) would achieve the guideline values on a winter basis.

7.165 Overall, the sunlight results in Block W1 show a reasonable level of adherence to the BRE guidelines.

Block T1

7.166 The sunlight assessment results demonstrate that 100 (78%) of the 129 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 36 south-facing LKDs assessed, 27 (75%) would meet the guidelines for sunlight exposure.

7.167 The APSH results for this block confirm that 48 (37%) of the 129 rooms assessed would achieve the guideline values on an annual basis and 96 (74%) would achieve the guideline values on a winter basis.

7.168 Overall, the sunlight results in Block T1 show a good level of adherence to the BRE guidelines.

Block C1

7.169 The sunlight assessment results demonstrate that 21 (18%) of the 120 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 36 south-facing LKDs assessed, 15 (42%) would meet the guidelines for sunlight exposure.

7.170 The APSH results for this block confirm that 17 (14%) of the 120 rooms assessed would achieve the guideline values on an annual basis and 22 (18%) would achieve the guideline values on a winter basis.

7.171 Overall, the sunlight results in Block C1 show a reasonable level of adherence to the BRE guidelines.

Block T2

7.172 The sunlight assessment results demonstrate that 112 (71%) of the 157 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 44 south-facing LKDs assessed, 33 (75%) would meet the guidelines for sunlight exposure.

7.173 The APSH results for this block confirm that 58 (37%) of the 157 rooms assessed would achieve the guideline values on an annual basis and 118 (75%) would achieve the guideline values on a winter basis.

7.174 Overall, the sunlight results in Block T2 show a good level of adherence to the BRE guidelines.

Block C2

7.175 The sunlight assessment results demonstrate that 37 (16%) of the 224 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by

windows facing 90 degrees due south confirm that, of the 74 south-facing LKDs assessed, 25 (34%) would meet the guidelines for sunlight exposure.

7.176 The APSH results for this block confirm that 24 (11%) of the 224 rooms assessed would achieve the guideline values on an annual basis and 44 (20%) would achieve the guideline values on a winter basis.

7.177 Overall, the sunlight results in Block C2 show a reasonable level of adherence to the BRE guidelines.

Block T3

7.178 The sunlight assessment results demonstrate that 138 (75%) of the 185 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 52 south-facing LKDs assessed, 39 (75%) would meet the guidelines for sunlight exposure.

7.179 The APSH results for this block confirm that 68 (37%) of the 185 rooms assessed would achieve the guideline values on an annual basis and 143 (77%) would achieve the guideline values on a winter basis.

7.180 Overall, the sunlight results in Block T3 show a good level of adherence to the BRE guidelines.

Block C3

7.181 The sunlight assessment results demonstrate that 105 (38%) of the 279 rooms assessed meet or exceed the BRE guidelines. The results of the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 82 south-facing LKDs assessed, 54 (66%) would meet the guidelines for sunlight exposure.

7.182 The APSH results for this block confirm that 46 (16%) of the 279 rooms assessed would achieve the guideline values on an annual basis and 69 (25%) would achieve the guideline values on a winter basis.

7.183 Overall, the sunlight results in Block C3 show a reasonable level of adherence to the BRE guidelines.

Block T4

7.184 The sunlight assessment results demonstrate that 189 (66%) of the 288 rooms assessed meet or exceed the BRE guidelines. The results for the main living spaces which are served by windows facing 90 degrees due south confirm that, of the 88 south-facing LKDs assessed, 79 (90%) would meet the guidelines for sunlight exposure.

7.185 The APSH results for this block confirm that 129 (45%) of the 288 rooms assessed would achieve the guideline values on an annual basis and 166 (58%) would achieve the guideline values on a winter basis.

7.186 Overall, the sunlight results in Block T4 show a good level of adherence to the BRE guidelines.

Assessment of Sunlight/Overshadowing to Amenity Areas

7.187 The assessment of sunlight and overshadowing to the amenity areas within the development has been undertaken in accordance with the BRE guidelines ‘2 hours sun on ground’ test, on 21 March (Spring Equinox). The BRE guidelines recommend that at least 50% of the amenity area should receive at least 2 hours of sunlight on 21 March.

7.188 The image below identifies the amenity areas tested, with areas that will receive at least 2 hours of sunlight on 21 March shown cross-hatched in yellow and those that will receive sunlight for shorter duration shaded in grey. The proportion of each space achieving the 2 hours of sunlight is expressed as a percentage in the image.

Figure 15: Sunlight received to amenity areas.

7.189 The 2 hour sun contour results show that 10 of the 15 amenity areas will receive at least 2 hours of sunlight on 21 March to at least 50% of their area. This includes the MUGAs/sports pitch within the school site and the large public open space to the east of the site (Park East).

7.190 Of the amenity areas that fall short of the guidelines, 3 (A13, A14 and A15) achieve 2 hours of sunlight to over 25% of their areas on 21 March. In terms of the remaining 2 areas, Area A3 will not receive 2 hours of sunlight to any part of this amenity area on 21 March whilst Area A4 will receive 2 hours of sunlight to 2.98% of the area on 21 March. These two areas largely serve the northern buildings within the masterplan; however, occupiers of these buildings will also have access to the public open space areas within the masterplan.

7.191 The assessment also carried out a transient overshadowing study by plotting a series of shadow plans at hourly intervals on 21 March, 21 June and 21 December. The results of the transient overshadowing study shows that on 21 March, the proposed buildings cast shadow which extends to the end of the development site to the west between 8am and 9am. Between 10am and midday, the shadow cast is more limited and extends to the north-west, gradually moving to the north. Between 1pm and 4pm, the shadow moves from the north to the north-east of the proposed buildings.

7.192 On 21 June, the shadows cast by the proposed buildings are at their longest between 6am and 8am and 5pm and 6pm. Between 9am and 3pm the shadows fall closer to the proposed massing and are limited in extent.

7.193 On 21 December, the shadows cast by the proposed buildings are longer than those indicated by the March and June assessments, as the sun is lower in the sky. The shadow moves from the north-west at 10am, to the north at 12pm. By 2pm the shadow is cast to the north-east.

7.194 The assessment concludes that for each of the dates assessed, the amenity spaces in the centre and to the north of the site will be overshadowed at different parts of the day as a result of the configuration of the massing adjacent to these areas. Throughout the year, the amenity

spaces at the south of the site along Millwall Dock will experience very limited shadow as a result of the proposed development.

Conclusion on Daylight/Sunlight and Overshadowing for Proposed Development

7.195 In summary, in terms of daylight impacts, based on the sample of 52% of habitable rooms assessed, the results demonstrate that 71% (1,410 rooms) of the total habitable rooms (1,975 rooms) will satisfy or exceed the minimum recommended illuminance targets.

7.196 Of the 12 blocks assessed, 8 blocks (Blocks E1, N1, N3, W1, T1, T2, T3 & T4) would experience good levels of daylight, with 70%-97% of the sample rooms meeting their recommended lux targets. The submitted assessment has been independently reviewed by Delva Patman Redler (DPR). DPR have confirmed that these blocks would generally achieve satisfactory daylight levels commensurate with similar sized developments. The remaining 4 blocks (Blocks N2, C1, C2, C3) would experience reasonable levels of daylight, with 34%-58% of the sample rooms meeting their recommended lux targets. DPR consider that these blocks would achieve relatively low levels of adherence to the recommended lux targets. However, this is in part due to the design of the blocks (particularly Blocks C1, C2 and C3) as they have projecting wings arranged around a courtyard and projecting balconies. These are design elements that would restrict daylight.

7.197 Overall, however, in terms of daylight, DPR confirm that the development appears to provide a satisfactory level of adherence to daylight guidance for a dense housing development. There would be blocks achieving relatively low levels of daylight, but these could only be improved by a fundamental re-design of the scheme which it is not considered would be a reasonable expectation in this instance having regard to the fallback position of the extant planning permission which adopts the same masterplan principles as the proposed development.

7.198 In terms of sunlight received, of the 12 blocks assessed, 5 (Blocks E1, T1, T2, T3 and T4) would experience good levels of sunlight, with 66%-78% of the sample rooms seeing at least 1.5 hours of sunlight. DPR confirm that these blocks would achieve sunlight levels that are commensurate with similar sized developments. The remaining 7 blocks (Blocks N1, N2, N3, W1, C1, C2 and C3) will experience reasonable levels of sunlight, with 16%-56% of sample rooms meeting the recommended sunlight exposure target. DPR consider that these blocks would achieve low levels of sunlight; however, as per the above in terms of daylight impacts, this is as a result of the design of the blocks and the obstruction of other surrounding blocks, both of which restrict the access of sunlight. In addition, as highlighted earlier, the BRE guidelines recognises that rooms facing predominately north, east or west are unlikely to meet the guidelines. DPR conclude that in terms of sunlight, overall, the development appears to provide a low level of adherence to sunlight guidance for a dense housing development. However, it should be noted that the percentage adherences are based on all rooms being assessed. The BRE guide suggests that one room within each unit (preferably a living room) should meet the sunlight exposure target. Therefore, DPR confirm that it is likely that the percentage adherence for this scheme would be greater if the assessment results were based on one room within a unit meeting the target, rather than it being based on all rooms that have been assessed.

7.199 In terms of sunlight received by proposed amenity areas, the 2 hours sun on ground and transient overshadowing assessments show that 10 (67%) of the 15 proposed amenity areas within the development will achieve adequate levels of sunlight. Of the 5 amenity areas that fall short (A3, A4, A13, A14 and A15), amenity space A3 is a small strip located between blocks N2 and N3 and would not receive 2 hours of sun to any part of its area. Amenity area A4 is located between and to the north of blocks N1 and N2 and would see 2 hours of sun to only 2.98% of its area. Both of these spaces are positioned to the north of the proposed development where sunlight availability is restricted by the surrounding blocks.

7.200 In terms of amenity areas A13, A14 and A15 these are podiums of blocks C1, C2 and C3 and would see 2 hours of sun to 32.62%, 29.31% and 26.77% of their areas respectively. The open areas to the south of these spaces would mostly see the recommended 2 hours of sun

whilst the areas to the north, which are overhung by the blocks above, would, as expected, not receive 2 hours of sun. DPR's review concludes that the proposed development would generally benefit from adequate levels of sunlight and the larger open amenity spaces and those located to the south would be well sunlit. The limited number of amenity areas that do not meet the guidance are generally located to the north of the site and/or are obstructed by the design of the blocks or the proximity of other surrounding blocks which are typical scenarios within dense housing developments.

7.201 In conclusion, Officers agree that generally speaking the development will provide reasonable to good levels of daylight and sunlight to the development. There will be isolated buildings within the masterplan that will have low to reasonable levels of adherence however this is as a result of design features. Broadly speaking the amenity areas across the masterplan will also achieve good levels of adherence with isolated incidents of departure from BRE guidelines. The submitted daylight/sunlight assessment has been independently reviewed by Delva Patman Redler who did not dispute the findings presented in the assessment for the proposed development. The proposal therefore complies with Policy D.DH8 of the Local Plan in respect of daylight and sunlight received within the development.

URBAN DESIGN

7.202 Chapter 12 of the NPPF attaches great importance to achieving well-designed places. Paragraph 131 of the NPPF states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

7.203 Chapter 3 of the London Plan contains the suite of policies that are intended to promote good design of buildings and surrounding spaces. Policies D1-D9 of the London Plan collectively emphasise the expectation for high-quality design in all developments.

7.204 Specifically, Policy D1, Part B(3) of the London Plan requires Boroughs to advocate the design-led approach by establishing acceptable building heights, scale, massing and indicative layouts for allocated sites and, where appropriate, the amount of floorspace that should be provided for different land uses. Policy D3, Part A states that the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Part D(1) of the policy goes on to require that in relation to form and layout, development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, having regard to existing and emerging street hierarchy, building types, forms and proportions.

7.205 At the local level, Policy S.DH1 of the Local Plan echoes strategic objectives and requires developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. To this end, amongst other things, development must be of an appropriate scale, height, mass, bulk and form in its site and context.

7.206 Policy D.DH2 of the Local Plan requires developments to contribute to improving and enhancing connectivity, permeability and legibility across the borough.

7.207 Policy D.DH4 of the Local Plan requires developments to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted.

Density

7.208 The NPPF emphasises the importance of delivering a wide choice of high-quality homes and, as part of significantly boosting the supply of housing, advises that planning policies and decisions should support development that makes efficient use of land, taking into account: the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; local market conditions and viability; the

availability and capacity of infrastructure and services (both existing and proposed) as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; the desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change and the importance of securing well-design, attractive and healthy places. To this end, local planning authorities should set their own approach to housing density and plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. In some instances, it may be appropriate to set out a range of densities that reflect local circumstances rather than one broad density range.

7.209 Policy D3 of the London Plan requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.

7.210 Policy D4 of the London Plan requires all proposals exceeding 30 metres high and 350 units per hectare to demonstrate they that they have undergone a local borough process of design scrutiny.

7.211 Policy D.DH7 of the Local Plan requires that where residential development exceeds the density set out in the London Plan, it must demonstrate that the cumulative impacts have been considered (including its potential to compromise the ability of neighbouring sites to optimise densities) and any negative impacts can be mitigated as far as possible.

7.212 The London Plan no longer includes a density matrix as this has been replaced with a requirement to consider a design-led approach to optimising site capacity and this is now the principal approach to assessing the acceptability of the density of a scheme. .

Site Layout and Masterplanning

7.213 The masterplan largely adopts the site layout design principles as the consented scheme with the Boulevard forming the main east-west route through the site from Millharbour to Westferry Road. To the east, a new pedestrian route towards the dock front is introduced from Millharbour. In addition, reconnection to the lower residential dwellings to the north is proposed via through-routes linking the promenade fronting the dock to Millwall Dock Road and Starboard Way.

7.214 As per the consented scheme, the secondary school is located at the northwestern corner of the site with the main school building and teaching wing set back from Westferry Road. A separate but linked Sports Block sits to the east on the opposite side of Millwall Dock Road, with associated sport pitches and external games and play areas set against the residential back gardens at Claire Place. The Applicant has advised that the design and layout of the school largely adopts similar site layout and design principles as that of the consented application and has been updated to reflect the requirements of guidance contained in the DfE School Output Specification: Generic Design Brief (November 2022). The DfE have been consulted on this planning application and have not responded to the consultation exercise. Therefore, there is no suggestion from the DfE that the design and layout of the school is inadequate.

Figure 16: Layout of Secondary School

7.215 The main school building sits around an atrium which is identified in the Design and Access Statement as being the 'heart' of the space of the school. The atrium links the dining, drama and hall at the lower ground level and a library at ground floor level, providing opportunities for pupils to integrate and socialise. A large 'Pupil Plaza' is proposed in front of the western elevation of the main school building and next to Westferry Road. This will allow for large informal social and gathering spaces for pupils, particularly at the start of each school day, and directs pupils away from congregating near Caravel Close, the 2-4 storey flatted residential development located directly north of the school site. The Plaza is accessed via a secure boundary gate system. Compared to the consented scheme the main school building has been reduced in width slightly and the north-south teaching block extended in length to align with the boundary of the Docklands Business Centre to the north.

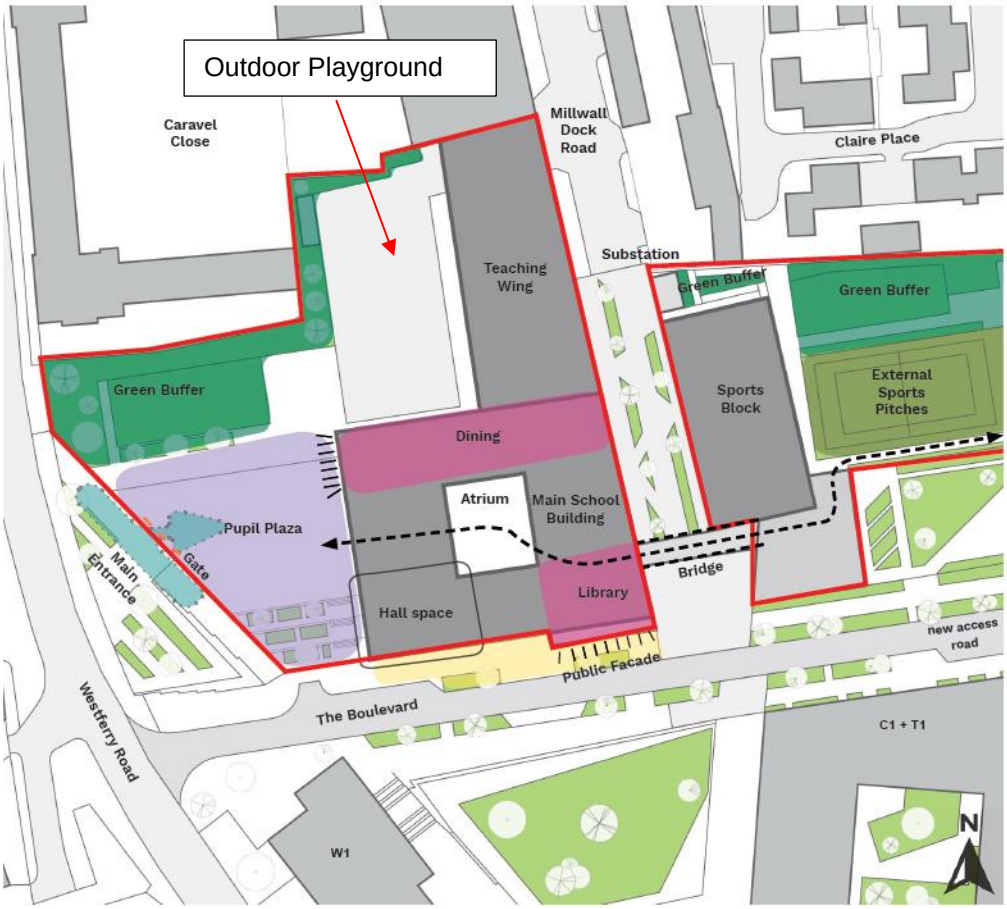

Figure 17: School blocks and surrounding spaces

7.216 The external areas within the school grounds and to the east of the sports block there will be 2 x MUGA (Multi-Use Games Area) pitches and an artificial sports pitch for 5-a-side football. To the west of the teaching wing of the main school building an outdoor playground is proposed. The main entrance to the school building will be via Westferry Road. A secondary vehicular/pedestrian access to the site is provided via a north-south pedestrian path.

7.217 In terms of the remainder of the wider masterplan site, two standalone buildings (buildings E1 and W1) are positioned at the main access points into the site, each leading up towards a large, open, green space (Printworks Plaza/Park East and Dockside Gardens). These buildings are described as 'Gateway' buildings with building E1 located by the eastern entrance from Millharbour with Park East located directly south of the building, and building W1 located by the western entrance and directly west of Dockside Gardens.

7.218 Building W1 faces Westferry Road and its alignment is parallel to the new road configuration by the Westferry Road entrance to the site. On the eastern side, Printworks Plaza and building E1 defines the entrance at Millharbour. Printworks Plaza offers an intimate setting for residents, leading to building E1 and Park East further south.

7.219 To the east of Dockside Gardens, the four Waterfront Towers (T1-T4) are located along the dock front and adjacent to the southern site boundary. Building T4 is identified in the masterplan as a standalone, landmark tower located at the southeastern corner of the site. Linking the buildings along the south is the promenade, where the existing narrow towpath is extended in width by the introduction of an upper promenade. The upper promenade level is raised to be level with the ground floor of all the residential buildings. This has been introduced as a change from the consented scheme to address and mitigate potential flood risk.

7.220 The proposed site layout and master planning principles which largely replicate the consented planning permission are considered to respond to the site's constraints, opportunities and local context. The permeability and spatial integration of the site would be an improvement on the consented scheme as there would be better connections from Millwall Dock Road and

Starboard Way to the dock edge. The scheme would also accord with guidance contained in the Mayor of London's Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF) which seeks to ensure that, amongst other things, emerging development enhances the setting and character of the docks, improves public realm and that buildings are designed around green spaces with strong visual links to the water and new green spaces.

Figure 18: CGI of Promenade Place indicating the upper and lower promenade levels.

7.221 At the eastern end of the masterplan, the promenade terminates at Promenade Place, where another area of public space is proposed to provide opportunities for active ground floor frontage to spill out next to the dock front.

7.222 Three courtyard buildings (C1-C3) lie directly to the north of buildings T1-T3 and are set back from the dock front. These buildings are U-shaped and physically linked to buildings T1-T3 at basement, ground and mezzanine levels. The mezzanine levels of these buildings will incorporate communal courtyards. Two pocket parks are proposed to the south straddled by buildings T1 and C1 (Promenade Pocket Park West) and T2 and C2 (Promenade Pocket Park East).

7.223 The northern buildings N1, N2 and N3 are located to the north of the Boulevard and east of the school. They are located closest to the low-rise residential developments to the north at Clarie Place and Starboard Way thus in the most sensitive location within the masterplan. To the north of buildings N1 and N2 an area of communal amenity and children's playspace is proposed, and to the south of the new school pitches and directly west of building N3, Boulevard Green is proposed: an area that seeks to provide opportunity for socialising and destination play.

Townscape, Massing and Heights

7.224 Policy D9 of the London Plan is specific to tall buildings and sets a number of criteria against which tall buildings should be assessed. Policy D9 directs development proposals to address visual (long, mid and immediate views, spatial hierarchy and legibility, architectural quality, protection of heritage assets, water spaces, visual glare and light pollution), functional (construction, servicing, access, transport network, economic outputs, the protection of the

aviation and telecommunications industry) and environmental impacts (wind, daylight, sunlight, enjoyment of water spaces, air and noise pollution) and any cumulative impacts.

7.225 Policy D.DH6 of the Local Plan sets out the criteria for assessing the appropriateness of a tall building. Part 1 of the policy set out a series of stringent design and spatial criteria which tall buildings must adhere to whilst Part 2 of the policy directs tall buildings towards the designated Tall Building Zones (TBZ).

7.226 The site falls within the Millwall Inner Dock TBZ which lies directly south of and abuts the Canary Wharf TBZ. The design principles for the Millwall Inner Dock TBZ require the following:

a) Building heights in the Millwall Inner Dock cluster should significantly step down from the Canary Wharf cluster to support its central emphasis and should be subservient to it.

b) Building heights should step down from Marsh Wall and ensure that that integrity of the Canary Wharf cluster is retained on the skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in Policy D.DH4.

7.227 Whilst the scheme seeks to significantly increase the density of the development from the consented scheme, the maximum height of the proposed development will remain as per the 2016 consented scheme at 110.90m (approved with 30 storeys). To assist Members, a comparison of the maximum heights of buildings in the 2016 consented scheme, the Appeal Scheme and the proposed scheme is set out below to provide an overview as to how the height strategy has evolved to the proposal in the current application.

Block/Tower	2016 Consented Height	Appeal Scheme Height	Proposed Application Height
School Building	Ground + 3 Storeys / 19.4m AOD	N/A	Ground + 3 Storeys / 21.245m AOD
W1 (Formerly B1)	8 Storeys / 32.21m AOD	13 Storeys / 48.22m AOD	10 +11 Storeys/ 43.63m AOD
T1	9 Storeys / 43.25m AOD	19 Storeys / 73.06m AOD	19 Storeys / 72.69m AOD
T2	13 Storeys / 56.05m AOD	23 / Storeys / 85.56m AOD	23 Storeys / 85.49m AOD
T3	17 Storeys / 68.85m AOD	32 Storeys / 114.66m AOD	27 Storeys / 98.29m AOD
T4	30 Storeys / 110.90m AOD	44 Storeys / 155.30m AOD	31 Storeys / 110.90m AOD
C1 (Formerly B2)	4 Storeys / 25.65m AOD	9 Storeys / 37.m AOD	6-8 Storeys / 37.47m AOD
C2 (Formerly B3)	5 Storeys / 28.85m AOD	9 Storeys / 37.00m AOD	7-10 Storeys / 44.22m AOD
C3 (Formerly B4)	7 Storeys / 35.25m AOD	9 Storeys / 37.00m AOD	8-11 Storeys / 47.62m AOD

E1 (Previously T5)	N/A	31 Storeys / 114.60m AOD	15 Storeys / 59.35m AOD
N1 (Formerly B6A)	5 Storeys / 21.96m AOD	7 Storeys / 31.5m AOD	4 + 9 Storeys / 37.25m AOD
N2 (Formerly Block B6B)	6 Storeys / 25.31m AOD	7 Storeys / 31.5m AOD	4 + 10 Storeys / 40.40m AOD
N3 (Formerly Block B7)	7 Storeys / 28.51m AOD	9 Storeys / 40.2m AOD	9 + 10 Storeys / 40.40m AOD

Table 7: Building heights of the scheme: Extant vs Appeal Scheme vs Proposed Scheme

7.228 The concept of stepping down was considered in detail by the Inspector in the report that he prepared following the 2021 public inquiry. The Inspector, when considering the effect of the scale, height and massing of the proposed development on the character and appearance of the surrounding area, identified a number of viewpoints in which the appeal scheme would be seen as a significant southward extension to the Canary Wharf cluster of buildings or where the towers would feature prominently in the skyline thus competing with and being comparable in scale to the Canary Wharf cluster of buildings.

7.229 Whilst the proposed development seeks some increases in the height of buildings across the masterplan, there are notable key differences between the proposed development and the Appeal Scheme. In particular, the height of tower T4 will now remain at the consented height of 110.90m AOD (albeit at 31 rather than 30 storeys) thus reduced from its height in the Appeal Scheme by some 44 metres (minus 13 storeys). In addition, T5, which was proposed in the Appeal Scheme as a 31 storey tower (114.60m AOD) is now proposed as a 15 storey midrise building (building E1) reaching 59.35m (AOD).

7.230 The application has been accompanied by a Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) that forms part of the Environmental Statement (ES) and includes verified views (48 views) that were agreed with Officers during the EIA Scoping and pre-application process.

7.231 The BHTVIA assesses the potential visual impacts of the proposed development on the character of the local and wider townscape, protected views, and the setting of heritage assets. The varying townscape impacts are considered throughout the BHTVIA from sensitive close range views to wider protected strategic views. Within the BHTVIA the townscape and visual magnitude of change (impact) is assessed as high, medium, low, very low or nil using the following criteria:

- High – major change to the value of the townscape or visual amenity.
- Medium – moderate change to the value of the townscape receptor or visual amenity.
- Low – minor change to the value of the townscape receptor or visual amenity.
- Very Low – barely discernible change to the value of the townscape receptor or visual amenity.
- Nil – no change to the value of the townscape receptor or visual amenity.

7.232 An impact of high magnitude would mean that the proposals would be very noticeable, comprising a notable change over an extensive area or an intensive change over a more limited area. A high magnitude of impact may comprise major alteration to key elements/features/characteristics of the receptor. An impact of medium magnitude would see the proposals be noticeable, comprising a recognisable change over a large area or a moderate change over a more limited area. A medium magnitude of impact may comprise alteration to one or more key elements/features/characteristics of the receptor. An impact of low magnitude will comprise noticeable but small change over a limited area or similar to a main component of the receptor. There may be minor alteration to one or more key elements/features/characteristics of the receptor. A very low magnitude of impact would mean that the proposals would not be noticeable, although would comprise a very small change over

a limited area or very similar to the main components of the receptor. There may be very minor alteration to one or more key elements/features/characteristics of the receptor. In terms of nil magnitude of impact, there would be no change to the value of the townscape receptor or visual amenity. The measure of the significance of effect resulting from the development on townscape and visual amenity are identified within the BHTIA as being Major (Significant), Moderate (Significant), Minor (Not Significant), Negligible (Not Significant) and None (No Effect).

7.233 With regards to the views identified by the Inspector, the BHTVIA has assessed these views both in context of their wider townscape role and how they would be perceived by local residents within the immediate townscape including those in low-rise developments. The key views identified by the Inspector in his assessment are considered and assessed below in relation to the proposed development.

View 23 – Millwall Park:

7.234 In relation to View 23, the Inspector considered that in this view, the Appeal Scheme would be seen as a significant southward extension to the Canary Wharf cluster and *"due to the effect of the distance, the scale would appear comparable to the Canary Wharf cluster, although it would not look as densely developed due to the spacing between the towers."*[7]

7.235 The BHTVIA identifies that View 23 will largely be experienced by users of receptor group[8] Mudchute and Millwall Park. This receptor group is represented by views 5 (Mudchute Park) and 23 (Millwall Park). From this townscape area, users (people) will be undertaking daily activities such as walking, sport and leisure and as such people in this townscape area would be aware of their immediate environment and wider surroundings including the large development forming part of the Canary Wharf and Millwall tall building clusters.

7.236 In terms of Millwall Park, the assessment reports that the visibility of the proposal would largely be limited to the upper half of the building, with the lower half of the proposal being occluded by interposing development. Furthermore, visibility of the proposal would also be screened by pockets of mature trees. Where the proposal would appear in these views, it would be seen above interposing development as a tall new building in the backdrop of views. The image below indicates the cumulative view of View 23 of the proposed scheme in blue wireline with the overlay of the Appeal Scheme in red wireline.

[7] Para.428 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021.

[8] Receptor groups are areas of townscape assessed.

Figure 19: BHTVIA View 23 (Millwall Park) cumulative view

7.237 In this view the significant reduction in heights of Towers T3-T5 compared to the Appeal Scheme can be seen. The notable drop in height of T5 particularly ensures that the proposed development no longer appears as an extension to the Canary Wharf cluster of buildings. Tower T3 would also be approximately 16 metres (minus 5 storeys) lower than the height of T3 in the appeal scheme. The ES reports that the majority of the schemes that are relevant to the cumulative assessment are located to the south or west of the Canary Wharf cluster and would appear to the right of the view. The overall cumulative effect would be to consolidate and intensify the development around the Canary Wharf cluster.

7.238 Overall, the assessment reports that the proposed development would give rise to Moderate Beneficial effect (Significant) to receptors.

View 25 - Greenland Dock

7.239 In this view the Inspector considered that *"..the spacing between T1, T2, T3 and T4 would not be apparent. The heights of T3, T4, T5 would, in combination, make a very strong feature on the skyline. Although T4 would in fact be around 2/3 the height of Number One Canada Square, due to the effects of distance it would appear to be of a comparable scale in this view. It would not be subservient to the Canary Wharf cluster."*[9]. The Inspector goes on to highlight that the additional height of the Appeal Scheme together with the introduction of T5 would significantly increase the impact.

7.240 The BHTVIA has assessed View 25 as part of the 'Riverside Users' receptor group which is represented by the following viewpoints: Views 10 (Millenium Dome), 25 (Greenland Dock), 26 (Dockmasters House Deptford) and 34 (Pillars of the Empire, Modern Wharf Road). The focus of receptors would be their activities along the pathways as well as the Thames and the medium and long views across to the Isle of Dogs. Receptors (i.e people) would be aware of the varied built form within the immediate and wider townscape, including the development associated with the Canary Wharf and Millwall tall building cluster. The below images are that

[9] Para.428 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021.

of 25L and 25M of View 25 (Greenland Dock) indicating the proposed scheme in blue wireline in the cumulative scenario and the appeal scheme outlined in the red wireline.

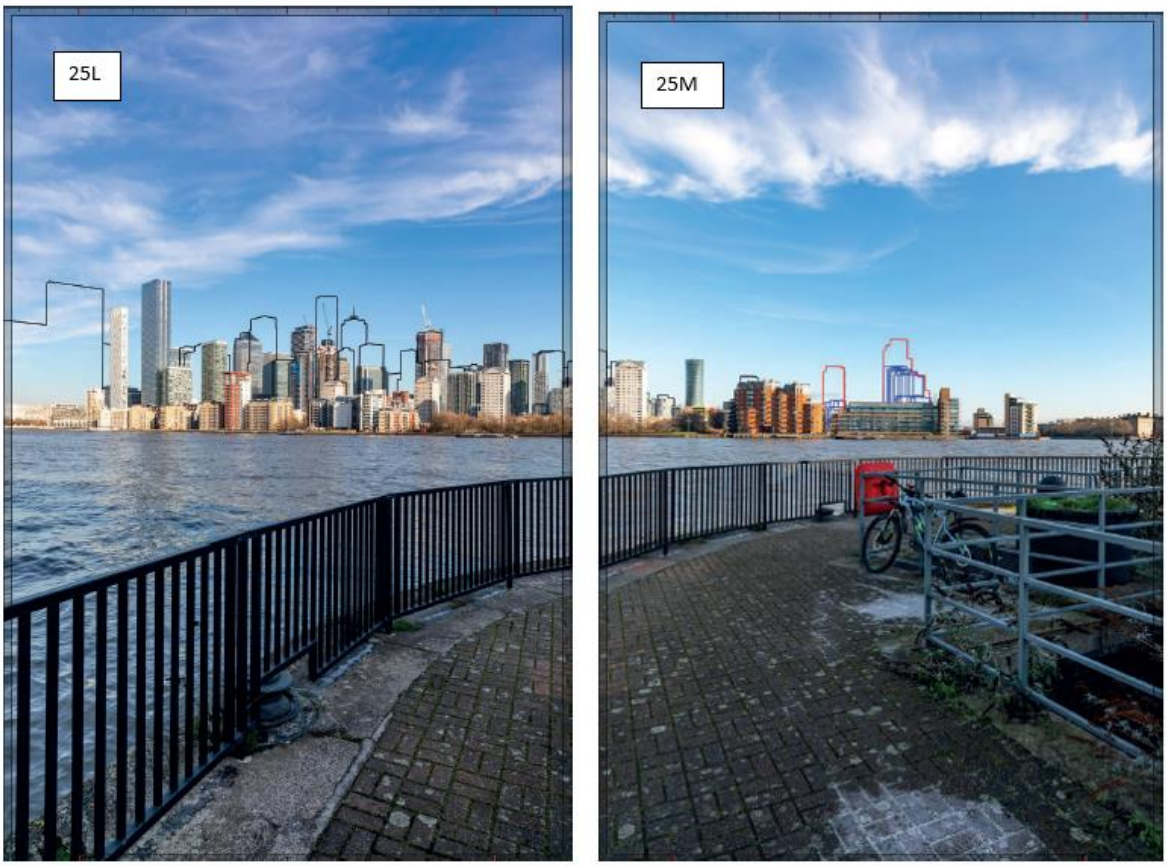

Figure 20: BHTVIA View 25L and 25M (Greenland Dock) cumulative view

7.241 The significant reduction in height of towers T4 and T5 (now E1) can been in View 25M. The assessment reports that in views that form part of the Riverside Users receptor group which includes View 25 (Greenland Dock), the proposals would be discernible. However, from these locations, the scheme would appear as an additional tall building associated within the existing tall building clusters at the Isle of Dogs. The buildings would sit comfortably within this context, with the proposed building heights of the scheme significantly stepping down from the Canary Wharf cluster to support its central emphasis.

7.242 Given the interposing distance, the detail of the elevations and the varied façade treatments would not be readily appreciated. However, the proposed development would be understood in the context of similar buildings.

7.243 Overall, the assessment concludes that due to the separating distance and the existing context of the tall and large development within the wider townscape, the proposed development would give rise to a Negligible Beneficial effect (Not Significant). In the cumulative scenario, a significant number of tall buildings would consolidate the skyline of the Isle of Dogs, resulting in a more consistent visual scale of development. The additional effects in the cumulative scenario would be unchanged resulting in a Negligible Beneficial effect (Not Significant).

View 18 – Across Sir John McDougall Gardens

7.244 In this view, the Inspector observed that Sir John McDougall Gardens is a riverside public park to the north-west of the site and whilst the Inspector noted that the nearby towers within the Barkantine Estate can be seen, the Inspector did not consider that these unduly impacted on the sense of openness as the view to the south-east is of trees and the sky. The Inspector concluded: *"Whist the consented scheme would be glimpsed above the trees, it would not be*

dominant. In contrast, B1, T1, T2, T3 and T4 of the appeal scheme would, collectively, dominate the outlook in this direction"[10].

7.245 The BHTVIA has assessed View 18 as part of receptor group 'Local Residents – North of the Site' which is also represented by the following viewpoints (in addition to View 18): Views 6 (Oakland Quay), 12 (Millharbour North), 13 (Millharbour South), 14 (64 Tiller Road/Starboard Way) and 15 (17 Tiller Road/Millwall Dock Road).

7.246 In this receptor group, local residents are likely to have a higher susceptibility to development given they reside in the area and will be more sensitive to visual change in their environment. The image below is of View 18 indicating the proposed scheme in blue wireline in the cumulative scenario and the appeal scheme outlined in the red wireline.

Figure 21: BHTVIA View 18 (Across Sir John McDougall Gardens) cumulative view

7.247 In this view the reduction in height of W1 (formerly B1), T3 and T4 compared to the appeal scheme can be seen. Building W1 has reduced in height by approximately 4.5 metres (minus 2 storeys). The assessment reports that View 18 is taken from the public open space at Sir John McDougall Gardens approximately 30 metres from the site boundary to the north-west. In the summer, the trees within the park would screen the development, with some glimpsed views. The assessment also reports that existing tall buildings such as Bowsprit Point (the southernmost of the 22-storey towers in the Barkentine Estate) are seen to the left of the view, whilst to the centre and right of the view the New Atlas Wharf Development is also seen. The assessment considers that the wireline of the scheme demonstrates that only the tops of the tower block elements will be visible rising just above the tree line and clearly subordinate to Bowsprit Point to the right.

7.248 The assessment concludes that the proposed development would result in Minor/Moderate Beneficial effect (Not Significant). In the cumulative scenario there would be modest change with further development either largely concentrated in areas to the north or east towards Millwall Inner Dock. However, due to the quantum of development that is taking place in proximity, people within this visual receptor grouping would be aware of extensive

[10] Para.429 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021

development taking place and the changing context. As such the significance of effect in the cumulative scenario would be Moderate Beneficial (Significant).

View 11 – Millwall Outer Dock

7.249 In this view the Inspector observed that the residential estates to the south of Millwall Outer Dock are characterised by low-rise buildings and that the scale of the Canary Wharf cluster would be apparent from these estates albeit there exists a degree of separation. The Inspector also noted that the scale and openness of the dock is a defining feature of the character of this locality and that *"Seen from the south of the dock (View 11), T1, T2, T2 and T4 would combine to dominate the water space. They would appear overbearing and would create a stark transition to the low-rise housing fronting the dock".*[11] The Inspector also considered that T5 at ground plus 31 storeys sited relatively close to the low-rise residential development would also create a stark transition in scale. The image below is of View 11 showing the proposed scheme rendered in the cumulative scenario and the appeal scheme outlined in red wireline.

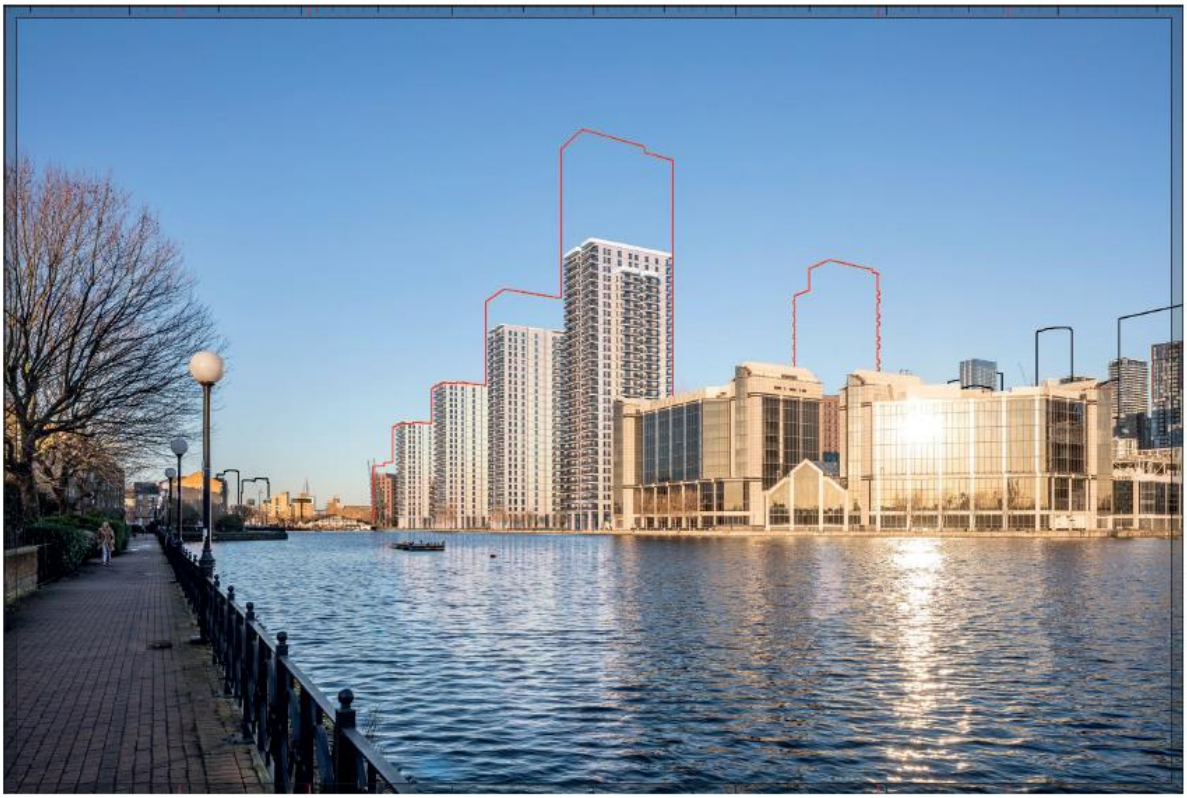

Figure 22: BHTVIA View 11 (Millwall Outer Dock) cumulative view

7.250 In this view the reduction in height of T3-T5 compared to the appeal scheme can be seen. Tower T3 is reduced by 16.37m (minus 5 storeys), T4 by 44.4m (minus 13 storeys) and T5 by 55.25m (minus 16 storeys).

7.251 The BHTVIA has assessed View 11 as part of receptor group 'Local Residents – South of Millwall Outer Dock)' which is also represented by the following viewpoints: Views 17 (Ashdown Walk), 39 (Dockside at Site) and 40 (Dockside at Site). Receptors within this group comprise local residents within the immediate townscape and in particular the low to mid-rise area south of Millwall Outer Dock.

7.252 The proposal would be highly visible from viewpoints located on the southern side of the Millwall Outer Dock owing to the open character of the dock which allows for uninterrupted views of the site across the water. However, beyond Spindrift Drive to the south of Millwall

[11] Para.431 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021

Outer Dock, visibility is reduced and restricted to small pockets of open character where street alignment and building orientation allow for partial visibility.

7.253 In View 11, the assessment reports that the proposed view opens up the length of the view, drawing the viewers' attention west towards the end of Millwall Outer Dock. The glazed materiality of the 'T' buildings complements adjacent buildings at No.5 and 6 Greenwich View Place at the corner of Millwall Outer Dock. The tapered composition adds interest to the skyline and the gradual decrease in height westwards steps down in scale towards the lower to mid-rise residential developments.

7.254 Whilst the scheme would introduce new buildings of a greater scale to the immediate surroundings, receptors within this group are aware of taller development located in proximity. As a result, the scheme responds to its location within the Isle of Dogs and South Poplar Opportunity Area and the Millwall Inner Dock Tall Building Zone where change including tall and large development is anticipated. The scheme would be commensurate with its location, forming a legible townscape marker to Millwall Outer Dock.

7.255 The assessment also highlights that the architectural treatment of the development will mitigate the visual impact with the tower elements located in the middle distance of the views. The towers would be articulated through their contemporary finishes and glazed planes that would contribute to an art-deco style that creates visual interest when juxtaposed against the interwar housing estates (as seen from View 17- Ashdown Walk).

7.256 The assessment concludes that the proposed development would result in a Minor/Moderate Beneficial effect (Not Significant) which would be increased to Moderate Beneficial effect (Significant) in the cumulative scenario whereby a number of schemes are coming forward within the Canary Wharf cluster of a similar height or taller than the proposed scheme thus resulting in an intensification of the skyline, increasing the impression of density and of tall buildings appearing closer to Millwall Dock.

View 14 – 64 Tiller Road/Starboard Way

7.257 This view shows the development form Tiller Road, to the north of the site, and how the scheme would handle a transition in scale across the site from Starboard Way to the waterfront. In relation to the appeal scheme, the Inspector considered *"…, the combined impact of B7 (ground plus 8 storey) and T3 would create a much more intensive feel".*[12] The image below shows View 14 with the proposed scheme rendered in the cumulative view with the Appeal Scheme outlined in red wireline.

[1212] Para.433 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021

Figure 23: BHTVIA View 14 (64 Tiller Road/Starboard Way) cumulative view

7.258 The BHTVIA has assessed View 14 as part of the receptor group 'Local Residents – North of the Site' and the views represented by this receptor group have been detailed earlier in this report. View 14 is taken from the residential area to the north of the site and approximately 20m from the boundary.

7.259 In View 14, residential buildings N1, N2 and N3 are visible and comprise mid-rise buildings between 4 and 10 storeys and provide a buffer and gradual step up in height towards the towers proposed at the southern perimeter at the rear, overall lessening the impact of the increase in height. To the rear, buildings E1, C3 and C2 stand at 8 to 15 storeys in height and beyond that, fronting the Millwall Outer Dock, the T4, T3 and T2 buildings form the background of the view and are noticeably much taller when compared to the buildings in the fore and middle ground of the view, scaling up to 31 storeys at T4. This is best appreciated from both views 13 (Millharbour South) and 14. View 13 has been included in Appendix 3 of this report.

7.260 The materiality of the buildings complements existing buildings in proximity and assists in blending the scheme into the existing context. The assessment reports that whilst the scheme will change the composition of views from residential areas to the north of the site, the overall effect would not be overbearing nor out of place within the existing context.

7.261 Whilst the scheme would introduce a new visual feature and scale into views, the scheme responds to its location within the Isle of Dogs and South Poplar Opportunity Area and Millwall Inner Dock Tall Building Zone where change incorporating tall and large development is anticipated and would be commensurate with its location, forming a legible townscape marker to Millwall Outer Dock.

7.262 The materiality of the proposal is varied, with each building sharing similarities in their façade treatment whilst maintaining their own identity in the architectural expression. These are discussed in more detail later in this report; however, the gateway buildings comprising stock brick materials will appear to take more references from the industrial heritage of the area, using earthy colours, masonry and metal and employing more of a warehouse style. In contrast, as mentioned earlier, the waterfront towers will have art deco references and make use of light colours and curved edges to reduce the impact of the building heights. The 'N' buildings in the foreground of View 14 comprise a mixture of both references.

7.263 The assessment concludes that the proposed development would result in Minor/Moderate Beneficial effect (Not Significant). In the cumulative scenario there would be modest change with further development either largely concentrated in areas to the north or east towards Millwall Inner Dock. However, due to the quantum of development that is taking place in proximity, people within this visual receptor grouping would be aware of extensive development taking place and the changing context. As such the significance of effect in the cumulative scenario would be Moderate Beneficial (Significant).

View 20 – Approach along Westferry Road (from North)

7.264 When considering this view, the Inspector noted that *"At the western end of the site, B1 (ground plus 12 storeys) would be sited close to Westferry Road (View 20B). The height and mass of this building, combined with absence of any significant setback or intervening lower-rise development, would result in a very dominant building that would be poorly related to the prevailing scale of this part of Westferry Road"*[13].

7.265 The image below shows View 20 with the proposed scheme rendered in the cumulative view with the Appeal Scheme outlined in red wireline.

Figure 24: BHTVIA View 20 (Approach along Westferry Road from North) cumulative view

7.266 In the above image, the reduction in height of building W1 (formerly B1) compared to the Appeal Scheme can be seen. This building was proposed at 48.22m (13 storeys) in height in the Appeal Scheme and has now been reduced to 43.63m (minus 4.59m) and reaching 10 and 11 storeys.

7.267 The BHTVIA has assessed View 20 as part of the receptor group 'Road Users of Westferry Road/A1206' which is also represented by the following viewpoints: Views 16 (122-126 Westferry Road Bus Stop), 19 (Approach along Westferry Road from north I), 21 (Approach along Westferry Road from south I), 22 (Approach along Westferry Road from south II) and 35 (Westferry and Claude Street).

[13] Para.433 of Inspector's Report A (IR.A) of Appeal Decision APP/E5900/W/19/3225474 dated 18th November 2021

7.268 View 20 and other views within this receptor group are likely to be experienced by users of Westferry Road including drivers and cyclists. The scheme would be visible to receptors travelling both north and south along Westferry Road. Travelling north to south the site becomes visible in glimpsed views at the junction of Byng Street and Westferry Road. In View 20, receptors will experience the new building in passing. The school and building W1 on the western edge of the site boundary would front Westferry Road.

7.269 Building W1 would reach a maximum of 11 storeys in height and be similar to others in the surrounding context. Building W1 has been designed as a 'gateway' building marking the western entrance of the masterplan and assisting in blending the scheme into the existing surrounding context. Both 'gateway' buildings in this scheme (E1 and W1) will employ a similar material language as the northern buildings helping to identify them as being a part of a wider development complex. However, the variations in colour and use of different shades of earthy tones help to add some visual interest. The massing of the buildings will be softened by the use of curved corners and the volumes are broken down by different setbacks at the upper levels.

7.270 In View 20, the waterfront towers (T1-T4) are more appreciated however the architectural detailing and the Art Deco style will differentiate these from the gateway buildings.

7.271 The scheme would be taller than the existing development located on the western front of Westferry Road. However, the development would be understood as part of the established context of tall and large development within the Millwall Inner Dock Tall Building Zone.

7.272 The assessment reports that receptors moving along Westferry Road would have a transient experience of the scheme, with views experienced as part of a moving sequence travelling north or south through the area. Once the site has passed, the proposals will not be visible. Views of the scheme would be limited and peripheral to the middle ground and backdrop of the view. Where seen, the proposals would be seen between existing tall and large buildings forming part of the Canary Wharf area.

7.273 Overall, the assessment concludes that the proposed development would result in a Minor Beneficial effect (Not Significant) to this receptor group in both the operational and cumulative scenarios.

Assessment against Tall Building Criteria

7.274 Policy D.DH6 of the Local Plan requires developments with tall buildings to demonstrate the following (as summarised):

a) have a proportionate height, scale, mass and volume.

b) be of exceptional architectural quality (including sustainable building design),

c) enhance character and distinctiveness of the area ensuring that townscapes, heritage assets, key views, skylines and landmarks are not affected,

d) provide a positive contribution to the skyline (day and night),

e) not prejudice future development potential of neighbouring sites,

f) maintain adequate distances between buildings and ensure a high quality ground floor experience,

g) demonstrate public safety requirements,

h) present a human scale of development at street level,

i) provide high-quality private communal open space/play space and public realm,

j) avoid microclimate impacts,

k) ensure no adverse impacts on biodiversity and open spaces, including watercourses and water bodies,

l) comply with civil aviation requirements and not have unacceptable impact on telecommunication.

7.275 Matters relating to criteria b), f), g), h), i), j), k) are discussed elsewhere in this report under relevant sections; Materials and Appearance, Quality of Residential Accommodation, Public Open Space/Public Realm, and Wind/Microclimate (both pedestrian and sailing microclimate) and the conclusions drawn are considered acceptable. The scheme is not considered to prejudice the future development potential of adjacent/neighbouring buildings or plots and therefore there are no conflicts with criterion e). Similarly, no objections to the proposals have been received from London City Airport or the National Air Traffic Services to indicate that the scheme conflicts with civil aviation requirements or impact on telecommunication as per part l). In terms of criteria a), c) and d) these are assessed below as part of the broader townscape assessment of the scheme.

Townscape Impact

7.276 The proposal would introduce prominent visual additions to the immediate, local and wider townscape having regard to the heights, scale and massing of buildings within the masterplan. The ES considers the surrounding townscape areas and determines the sensitivity of the views within these areas by considering their importance/value and their susceptibility to change.

Townscape Character Areas (TCA)

7.277 The BHTVIA considers the townscape impact of the proposed development on six Townscape Character Areas (TCA) as follows: TCA 1 (Millwall), TCA 2 (Canary Wharf), TCA 3 (Cubitt Town), TCA 4 (Blackwall and Coldharbour), TCA 5 (Deptford and Rotherhithe) and TCA 6 (Greenwich Pier). The likely effect of the proposed development on these Townscape Character Areas are summarised as follows:

7.278 *TCA 1 – Millwall*: This TCA covers the western part half of the Isle of Dogs, extending down along Millharbour from the boundary of the Canary Wharf Tall Building Zone (TBZ). High density residential and commercial development informs the existing context. The assessment reports that the site is located within the Millwall Inner Dock Cluster which comprises a secondary TBZ along the perimeter of Millwall Inner Dock. This area is subordinate to the Canary Wharf TBZ and provides a step in between the lower to mid-rise developments which are located in the southern part of the Isle of Dogs within Island Gardens.

7.279 The scheme has been designed to deliver a mixed-use neighbourhood set within a generous amount of publicly accessible open space with soft and hard landscaping areas that would improve the overall visual amenity and enhance the setting and character of the docks. The ES reports that the introduction of a new tall building at this site would help mark the location of the Millwall Outer Dock, improving legibility and wayfinding.

7.280 The ES reports that approaching the site from the north, receptors within TCA1 would appreciate the northern buildings (Blocks N1, N2 and N3) located at the northern periphery of the site boundary. These buildings are positioned north of the Boulevard and are designed to step down in height to the existing northern residential units. A ‘Green Spine’ traverses the masterplan area north to south in between building N3 to the west and N2 to the east, extending the pedestrian walkway at Starboard Way thus providing access and views towards Millwall Inner Dock, improving the legibility of the area.

7.281 The main visibility of the scheme would be experienced from the immediate streets with visibility largely contained within the south of Marsh Wall from the north and north of Spindrift Avenue to the south, as well as wider streets that align with the site.

7.282 The impact of the proposal on this TCA can best be seen in the following views:

- To the north of the site: Views 12 (Approach along Millharbour), 13 (Approach along Millharbour), 14 (64 Tiller Road/Starboard Way), 15 (17 Tiller Road/Millwall Dock Road), 18 (Across Sir John McDougall Gardens), 19 (Approach along Westferry Road from North).
- To the west of the site: Views 16 (122-126 Westferry Road) and 20 (Approach along Westferry Road from North) on Westferry Road.
- To the south of the site: Views 11 (Millwall Outer Dock), 39 and 40 from the southern edge of Millwall Outer Dock (both CGI views contained within the Design and Access Statement) and view 17 (Ashdown Walk) from the residential area to the south of Millwall Outer Dock.
- To the south of the site: Views 21 (Approach along Westferry Road from south), 22 and 35 (Westferry Road and Claude Street) on Westferry Road.
- To the south of the site: Views 27 (Chapel House St junction with Thermopylae) and 18 (Across Sir John McDougall Gardens) from Chapel House Conservation Area and;
- To the south of the site: View 24 (Great Eastern Lauch Site) from the river frontage the Great Eastern Launch Site.

7.283 Views 11, 39, 16 and 20 show the proposals at their greatest extent looking northwards towards the site across the open expanse of water at Millwall Outer Dock. In these views the proposed development is in the middle and foreground of the frame, seen in conjunction with other tall buildings located in the Canary Wharf TBZ to the north that forms the background of the view. View 11 is shown below depicting the cumulative view with a wireline of the consented scheme outlined in green.

Figure 25: BHTVIA View 11 – Millwall Outer Dock

7.284 In the image below the cumulative nighttime view of Millwall Outer Dock view can be seen.

Figure 26: BHTVIA View 11N – Millwall Outer Dock (Dusk)

7.285 Views 13, 14 and 15 looking south show the upper levels of the development rising above the roofline of interposing development whilst ground floor levels are occluded from view. From these views the architectural quality of the development would be apparent, including the different materiality and composition that respond to the industrial heritage of the area and is used to distinguish the different building types.

7.286 Other views taken from the west of the site, on Westferry Road and from within Sir John McDougall Gardens, reveal the new Boulevard road which acts as a pedestrian throughfare and assists in emphasising the residential character of the development. As distance from the site increases, views of the scheme would be limited to upper levels, with the lower half of the building occluded by interposing development. The assessment reports that, in addition, taller buildings in the wider context of the Isle of Dogs become more visible with increasing distance. As such the scheme would sit comfortably in these views, appearing at a similar height or subservient to others in the existing context.

7.287 The ES concludes that there would be a change of high magnitude to this TCA which is identified to have low-medium sensitivity, and the significance of effect would be Moderate Beneficial (Significant).

7.288 *TCA 2 – Canary Wharf:* This character area is located to the north of the site and is characterised by tall, large and modern development that forms the Canary Wharf TBZ. The townscape value of this TCA is identified to be high in the baseline condition. The BHTVIA reports that the scheme would be consistent with the development type which has been achieved in this character area and the proposals would continue the regeneration and redevelopment of this part of the Isle of Dogs.

7.289 The assessment reports that there is no visibility north of the Marsh Wall due to the density of development and building heights within this townscape character area which do not facilitate more distant views towards the site. As such a receptor's awareness of the scheme whilst they move through this character area is limited. In general, the massing of the proposal responds to the principles of development as set out in the Millwall Inner Dock TBZ which requires development to step down in height as one moves away from the Canary Wharf TBZ to the north.

7.290 The ES concludes that there would be a nil magnitude of impact on this TCA which is identified to have medium sensitivity, and the significance of effect would be None (Not Significant).

7.291 *TCA 3 – Cubitt Town:* This character area is located in the eastern half of the Isle of Dogs, its northern boundary aligning with the Canary Wharf TBZ, with Millwall Outer Dock to the west, and the River Thames to the east and northeast. This character area predominantly comprises residential buildings and includes a number of 20th century post-war housing estates. The northern extent and dockside at the western perimeter comprises a number of tall buildings. The Cubitt Town TCA also contains Millwall Park and Mudchute Farm to the south along with the River Thames to the east and northeast. The ES attributes a townscape value of Medium to the character area in the baseline scenario.

7.292 In terms of the impact of the proposal on this character area, the assessment reports that the waterfront buildings T1-T4 have been designed to improve legibility and wayfinding helping different receptor groups to identify the Millwall Dock. The upper levels of the southern and eastern elevations would be appreciated from views within this character area. The mass of the buildings is articulated through chamfered corners creating an elegant form which softens the urban character and bulk of the proposals. Other buildings to the north of buildings T1-T4 would only be visible in glimpsed views due to screening from interposing development. The assessment reports that the varied height, architectural styles and materiality lessen the magnitude of impact arising from the development and while an increase in density is perceived this would not be out of context with other developments in the wider tall building text.

7.293 The uses on the lower floors, enhanced landscaping and external amenity space will help to activate the ground floor area fronting the northern edge of the dockside. This activity would be visible from closer range views on the edge of the Millwall Inner Dock looking across water towards the site and would help contribute towards a landscaped waterfront environment thus improving visual amenity. The impact of the proposed development on this character area can best be experienced in Views 5 (Mudchute Park), 6 (Oakland Quay) and 23 (Millwall Park). The image below shows View 23 with the proposed development in blue wireline with the outline of the consented scheme depicted in green wireline.

Figure 27: BHTVIA View 23 – Millwall Park

7.294 The ES reports that the scheme would have a Medium to High impact on this TCA which is considered to have low sensitivity. The ES reports that the proposal would create a new landmark development visible from a number of locations within this character area where the urban character is more open. The redevelopment would improve the character of the Millwall Outer Dock northern waterfront which, as existing, appears as a vacant site cleared for redevelopment. The assessment concludes that the resultant effect would be Moderate Beneficial (Significant).

7.295 *TCA 4 – Coldharbour/Blackwall Basin Conservation Areas:* This character area is characterised by the residential neighbourhood of Blackwall and is separated by some distance from the application site. The existing surrounding townscape is formed of development which varies in scale, forms and architectural styles.

7.296 The assessment reports that the scheme would have no effect on the appearance of this part of the townscape or the way it functions. The site at its closest point is located over 1km from the TCA, and the impact of the proposal will be limited to visual impact. View 8 (Preston Road Drawbridge) of the BHTVIA would be of relevance and this view would be unaffected by the scheme, with interposing development screening the proposed development entirely from view. As a result, receptors located within this TCA would have no awareness of any change taking place on the site.

7.297 The ES concludes that there would be a nil magnitude of impact on this TCA which is identified to have low sensitivity, and the significance of effect would be None (Not Significant).

7.298 *TCA 5 – Deptford and Rotherhithe:* This TCA is located to the west and south of the site and is within the London Boroughs of Southwark and Lewisham on the opposite side of the River Thames to the site. The existing townscape is mixed with key elements including the River Thames frontage, former industrial land and extensive land areas that have been cleared for redevelopment along the river front. Further inland, buildings are predominantly low to mid rise and residential in use.

7.299 The site at its closest point is located 500m from this TCA and over 750m from built development and the impact of the proposal will be limited to visual impact. The assessment reports that the scheme would have no effect on the appearance of this part of the townscape or the way it functions. Visibility is shown to be largely contained within the immediate riverside with limited visibility further inland beyond the river frontage. Visibility also occurs from sites which have been cleared for major redevelopment; however, once planning consents have been built out the visibility of the scheme in these locations and beyond would diminish.

7.300 Views from this character area include views 9 (Stave Hill), 25 (Green Land Dock) and 26 (Dockmaster's House, Deptford). The assessment reports that in each of these views, the scheme would appear as a new feature in the backdrop, seen in conjunction with the existing tall building cluster at Canary Wharf. Overall, the scale of the tallest tower elements would sit comfortably within the established skyline and would not be readily discernible from the existing cluster. The image below shows the cumulative View 9 with the proposed development outlined in blue wireline and the consented scheme outlined in green wireline.

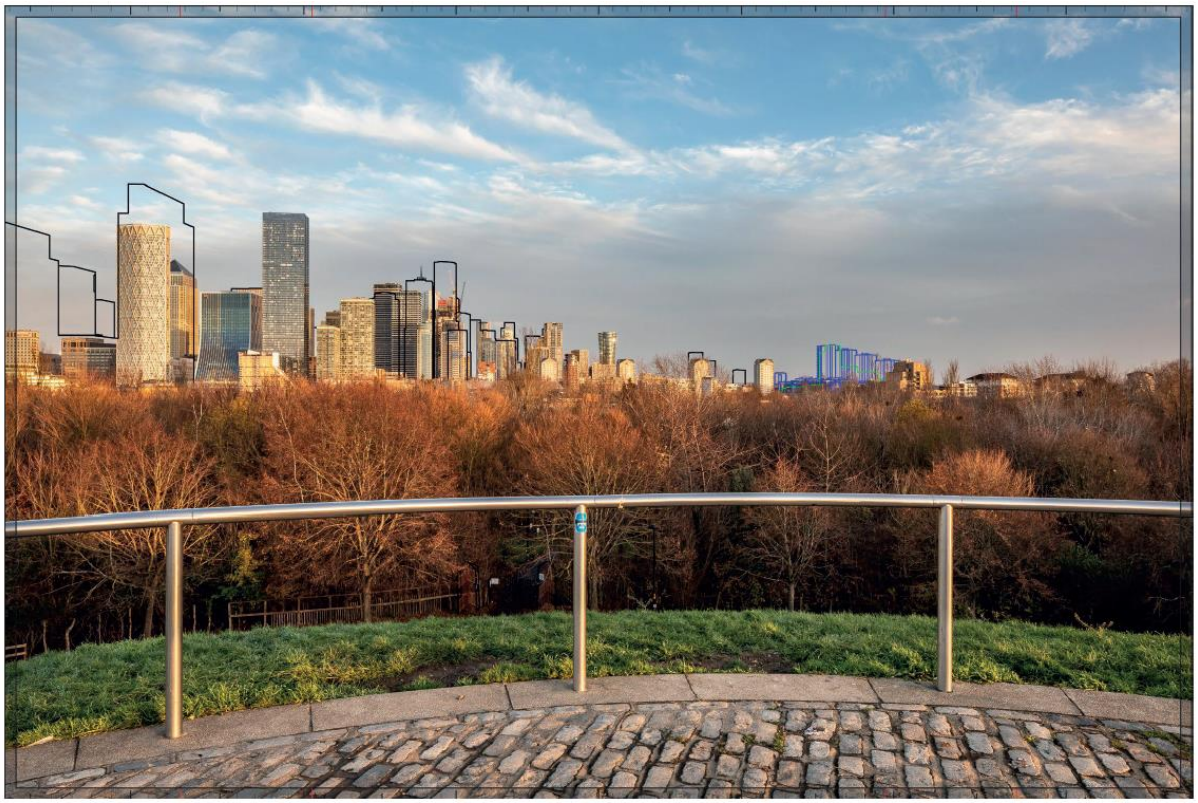

Figure 28: BHTVIA View 9 (Stave Hill)

7.301 The ES concludes that there would be a nil magnitude of impact to this TCA which is identified to have low sensitivity, and the significance of effect would be None (Not Significant).

7.302 *TCA 6: Greenwich Pier:* This TCA is located to the south of the site and includes the waterfront development at Greenwich as well as a proportion of the River Thames. The character area is separated by some distance from the site and the assessment reports that the scheme would have no effect on the appearance of this part of the townscape or the way it functions. The site at its closest point is located over 1.15km from the TCA, and the impact of the scheme will be limited to visual impact.

7.303 BHVIA views taken from this TCA include views 7 (Royal Naval College), 41-46 (views moving through Greenwich Park[14]) and 47-50 (central walkway at the Royal Naval College[15]). The scheme appears similarly in these views, forming an additional tall building element within the tall skyline where a number of existing tall buildings preside and in particular the Canary Wharf cluster.

7.304 The ES concludes that there would be a nil magnitude of impact to this TCA which is identified to have medium sensitivity, and the significance of effect would be None (Not Significant).

Construction and Cumulative Impacts on Townscape Character Areas

7.305 During the construction phase of the development, the ES reports that as the site has already been cleared as part of the implemented 2016 consent, the extent to which the character of the townscape will temporarily be altered is reduced. During the construction works, the full perimeter of the site would be enclosed with hoardings which will assist in providing a visual buffer to the immediate environment. However, due to the scale of the development and proximity to sites that are in occupation, the development will have some townscape impact during the construction phase of the development.

7.306 The assessment reports that Townscape Character Areas 4 (Blackwall/Coldharbour Lane Conservation Areas), 5 (Deptford and Rotherhithe) and 6 (Greenwich Pier) would experience

[14] Views Greenwich Park GV1 – GV6 of BHTVIA
[15] Views GV7-GV8 (Queens House) and GV9-GV10 (University of Greenwich) of BHTVIA

a magnitude of impact of Nil (Not Significant) due to the separating distance and interposing development.

7.307 The construction stage would have a direct impact on TCA 1 (Millwall) in which the scheme is located. The activities related to construction are most likely to affect the townscape receptors closest to the site. The magnitude of impact will be greatest where there are more sensitive uses, such as residential uses, in close proximity. This includes properties located on Tiller Road, Westferry Road and Millharbour. The assessment reports that the magnitude of impact would be Medium and the likely significance of effect would be direct, temporary and medium-term Minor to Moderate Adverse (Not Significant). The adverse effect would cease upon completion of the scheme.

7.308 In terms of character areas TCA 2 (Canary Wharf) and TCA 3 (Cubitt Town), both of these areas are likely to experience some impact from the construction phase of the development which would have an adverse effect on the townscape appearance and function. The impact on TCA 2 would be limited due to the density and height of interposing development within the northern area of the Millwall character area (TCA 1) and the southernmost region of Canary Wharf resulting in limited visibility beyond Marsh Wall. As such the likely impacts would be views of cranes in the distance rising above existing roof lines and potentially road closures, increased traffic and noise and dust pollution; however, these impacts would be limited/appropriately mitigated. The ES concludes that the magnitude of impact on TCA 2 would be Low and the significance of effect would be Minor Adverse (Not Significant).

7.309 TCA 3 (Cubitt Town) is also likely to experience some impact due to the open character of the docks allowing views of the development site across the Millwall Outer and Inner Dock bodies of water. However, the assessment reports that the effects will be limited to partial visibility of construction vehicles and machinery, dust and some noise. The separating distance and interposing development is greater than that between the application site and TCA 2 (Canary Wharf) and therefore the likely effects will be even less in TCA 3. The ES concludes that the magnitude of impact on TCA 3 would be Low and the significance of effect would be Minor Adverse (Not Significant).

7.310 In terms of the impact of the development on the 6 Townscape Character Areas in the cumulative context, the ES confirms that the impact of the scheme will not give rise to any material change over and above that identified in the assessment for the completed development scenario as discussed earlier in this report. .

Conclusions on Tall Building Policy

7.311 It is noted that planning permission has been granted for tall buildings at the application site and this represents a fallback position. The consented scheme established the maximum height of 110.90m on the basis that whilst the building heights would rise well above the immediate context including the 4 storey development on the south side of the dock, Officers considered that the towers would improve legibility of the area, emphasising the visual significance of the north side of the dock and enhance the skyline. Building heights in the consented masterplan increase towards the dock edge where T4 terminates and steps down to the west. Officers considered that the increase of height and scale towards the south-eastern corner would provide a visual marker for the site when viewed south along Millharbour and relate to the taller buildings that have been granted planning permission to the east (Crossharbour District Centre).

7.312 Officers have carefully considered and assessed the proposed scheme against Parts 1 and 2 of Policy D.DH6 of the Local Plan and consider the proposed development continues to broadly comply with this policy. The proposed development maintains the maximum height of 110.90m across the masterplan and continues to step down from east to west. However, Place Shaping Officers have noted that tower T4, the tallest building along the dock edge, has lost its clear role as a marker building within the townscape and as such the design composition of the extant planning permission, with diminishing heights moving west, has been eroded. Whilst Officers agree that the increase in height of the buildings across the masterplan visually reduces the degree of graduation in height between T1-T4 in particular, building T4 will still be recognised as the tallest building within the masterplan and still serves

to function as a marker building terminating the dock edge, albeit to a lesser degree than the extant planning permission.

7.313 Place Shaping Officers have also raised concerns with regards to the height of building E1. During pre-application discussions Place Shaping Officers considered that a maximum of 15-storeys (approximately 45m) would be appropriate for E1, but building E1 is proposed at double height ground plus 15-storeys. Place Shaping Officers consider that this building in particular does not comply with the Local Plan policy requirement to step down from Marsh Wall and does not have a townscape role to justify a taller building in this location.

7.314 Whilst Place Shaping Officers' comments are noted and Officers agree that there is merit from a townscape perspective in building E1 being lower in height, Officers also acknowledge that the BHTVIA accompanying the planning application has demonstrated how building E1, in conjunction with the northern blocks and courtyard buildings, provide a buffer and gradual step up in height towards the towers proposed along the dock front. Building E1 is also an affordable housing block and any amendments that would see a reduction in height of this block could potentially impact on the affordable housing offer of 35% proposed under this scheme. When balancing the benefits of the proposal against this localised concern with the scheme in isolation, Officers do not consider that the townscape harm outweighs the public benefits of the proposal and therefore, on balance, the proposed height of building E1 is considered to be acceptable. Moreover, notwithstanding the concerns raised in respect of building E1, Place Shaping Officers recognise that the proposal, whilst intensifying the use of the site, does seek to optimise residential development in line with Policy D3 of the London Plan.

7.315 On balance, therefore, Officers conclude that the proposed development and the increase in height of buildings from the extant planning permission, broadly accords with the ambitions and policy objectives of Policy D.DH6 through the considered distribution of height and massing across the site, the architectural quality of the development and the pedestrian and human environment and experience as discussed elsewhere in this report. The masterplan as a whole is considered to meet Objective GG2 and Policy D3 of the London Plan which identifies that to create sustainable mixed-use places that make the best use of land, those involved in planning and development must amongst other things apply a design-led approach to determine the optimum development capacity of sites.

Architecture and Appearance

7.316 As detailed earlier the building plots within the masterplan are classified into four typologies: The Gateway Buildings (E1 and W1), The Waterfront Towers (T1-T4), The Courtyard Buildings (C1-C3) and The Northern Buildings (N1-N3). The architectural design of the masterplan as a whole takes inspiration from the character of the Docklands and the surrounding area. With a variety of architectural expression across the masterplan, each of the four building typologies has its own materiality and character.

Gateway Buildings

7.317 The Gateway Buildings will share similar massing and façade design principles with each building consisting of two interlocking massing volumes. These vertical volumes are then broken down into three distinct parts to form a base, middle and a top.

7.318 For both buildings, the arrangement of the vertical volumes create a setback at roof level to create roofscape interest to each building. The stepped roofscape can be used to create a terrace with a biodiverse green roof with the main volume of the buildings extending to full height to accommodate photovoltaic panels and plant.

7.319 At the base of the buildings, the ground and mezzanine floors include extensive full height glazing which allows for transparency and allows for active frontage facing the Dockside Gardens and Boulevard (building W1) or Park East and the Boulevard (building E1). The residential uses of both buildings is visually reflected in the brickwork facades, uniformly sized windows, rounded corners and balconies. The balconies and brickwork banding create a

horizontal reading that expresses the floor slabs and helps break up the verticality of the buildings.

Figure 29: CGI of building W1 (Southeast View from Dockside Gardens)

7.320 The Gateway buildings are built from bricks and reference historic warehouse buildings that are associated with dockside locations. It is proposed to use different shades of warm and earthy toned bricks to create a differentiation from the other buildings whilst still enabling them to feel like a coherent part of the overall masterplan. The image below identifies the indicative materials proposed:

1. External Wall Finish: Ibstock Brick- Niveus (or similar) with Medium Grey Mortar

2. External Wall Detail (horizontal banding): Ibstock Brick-Bradgate (or similar) with Medium Grey Mortar

3. Balcony Cladding, Parapet Coping, Balustrades, Louvres: Brushed Bronze Aluminium

Figure 30: Materials palette for Gateway buildings

7.321 To complement the brick tones, the metal highlights such as the windows, balconies and external balustrades are proposed in brushed bronze-coloured aluminium.

Courtyard Buildings

7.322 The Courtyard Buildings provide areas of semi-private communal amenity use for residents at podium courtyard levels with elevated views to the water. The Courtyard Buildings benefit from southern views over the three podium courtyards and towards the waterfront views of the dock. The inner courtyard residential units that overlook the podium levels include angled hanging balconies to facilitate improved dock views and privacy. The remaining views from these buildings provide oblique views of the dock front or a view towards the green areas of the spine routes or the Boulevard.

7.323 As a group, the Courtyard buildings create a varied mid-rise backdrop behind the Waterfront Towers when viewed from the south. Each building consists of three interlocking massing volumes that create a varied roofscape. The three courtyard buildings step down in height from east to west in a similar way to the Waterfront Towers with C1 being the lowest building reaching 6-8 storeys. The volumes of the buildings are arranged in a 'U' shape to create the south facing podium courtyards.

Figure 31: Podium courtyard CGI view of building C2

7.324 At the base of the buildings, the ground and mezzanine floors are set back from the staggered volumes above to provide a continuous façade along the Boulevard and spine routes. The lower floors are differentiated from the brickwork above by a continuous, horizontal GRC (glass reinforced concrete) band. At ground level, extensive full-height glazing in combination with light grey GRC panels are proposed to provide visual connection with the commercial spaces on the ground floor.

7.325 Above the ground floor, the northern volume would appear elevated with a cut-out in the massing at the mezzanine and first floors to allow for natural daylight and ventilation to the Boulevard and creating a visual connectivity from the promenade through to the podium and into the Boulevard. Visually the façade treatment of the courtyard buildings consists of uniformly sized windows, and two different balcony designs: rectangular balconies along the east, west and north facades; and hanging balconies facing the podium courtyards reflecting the industrial heritage of the site.

7.326 The courtyard buildings seek to adopt the warm and earthy tones of the brick façade of the Gateway buildings and light grey and beige tones from the Northern buildings. Each of the courtyard buildings will utilise subtle variations of brick colours to give each building an identity. Building C1 will contain a contrasted combination of earthy and grey tones. Building C2 will be more muted in colour, both in terms of its shade and tone variation in comparison with building C1. Building C3 will reference the colour contrast of building C1 however its tone will

be paler and similar to building C2. Contrasting with the brickwork, dark grey hanging balconies are proposed again to reference the industrial heritage of the site. The balconies will be consistent across all three courtyard buildings. The image and materials key below illustrates building C2 as an example.

Figure 32: Detailed elevation for building C2

1. External Wall Finish: Ibstock Brick- Bruges Blend (or similar), with Medium Bluff Mortar

2. Ground Floor External Wall Finish: Light Grey GRC Cladding

3. External Wall Detail (horizontal frieze): Light Grey GRC

4. Balcony Cladding, Parapet Coping, Balustrades, Louvres: Dark Grey Aluminium

Figure 33: Materials palette for building C2.

7.327 At the lower levels, all the courtyard buildings propose the use of GRC panels below a GRC banding at first floor level to create visual and physical links to the towers. The light grey coloured GRC panels will incorporate an intricate vertical pattern contrasting with the brickwork above. Dark grey aluminium window frames are deployed to provide synergy with the balconies.

7.328 All the courtyard buildings adopt a consistent design approach and language to mark the residential entrances with the use of aluminium feature panels and canopies so that they are easily identifiable.

Northern Buildings

7.329 The Northern buildings have been designed to respond to their location and proximity to the existing low-rise residential properties on Clarie Place and Starboard Way. The Northern buildings offer views over external communal amenity areas, the school playing fields and the skyline of Canary Wharf beyond.

7.330 Buildings N1 and N2 have 'L' shaped footprints aligned along the Boulevard to the south and set back from the site boundary to the north. Each building consists of two interlocking massing volumes that step down in height from the south to the north to create a setback from the northern boundary to minimise the impact of the massing of the buildings. This introduces a stepped roofscape to the buildings that can accommodate areas of biodiverse green roof, photovoltaic panels and plants.

7.331 The middle component of these buildings houses the residential uses and the architectural language used to reflect this includes brickwork facades featuring domestically scaled windows, rounded corners to soften the massing of the buildings, and residential balconies. Brickwork horizontal banding is proposed to emphasise the floor slabs and break up the massing of the buildings.

7.332 At the base, there is an upwards slope from Starboard Way to the Boulevard thus the ground floor heights of the buildings N1 and N2 vary to respond to the sloping context.

Figure 34: CGI of buildings N1 and N2 southeast view

7.333 The materiality of the buildings would be similar to the Gateway and Courtyard buildings and comprise light grey and beige toned brickwork. The colours would alternate between buildings N1 and N2 to give each building its own identity whilst being part of a group. To complement the brickwork, brushed bronze-coloured aluminium is proposed for the balconies and windows across all the northern buildings.

1. External Wall Finish (N1), Detail (horizontal banding, N2): Ibstock Brick - Moseley (or similar) with Dark Grey Mortar

2. External Wall Finish (N2), Detail (horizontal banding, N1): Ibstock Brick - Finnieston (or similar) with Medium Grey Mortar

3. Balcony Cladding, Parapet Coping, Balustrades, Louvres: Brushed Bronze Aluminium

Figure 35: Materials palette for buildings N1 and N2

7.334 Building N3 follows a similar principle to buildings N1 and N2 in that it takes the form of an 'L' shaped building comprising interlocking massing volumes. It differs from buildings N1 and N2 in that it has a setback at Level 09. Building N3 would also share the material palette of building N1 with the main façade comprising light grey brick with beige horizontal banding with bronze coloured balconies and windows.

7.335 Across all three buildings, full height glazing and metal louvres are introduced to the base of the building, aligning to the window openings at the upper levels and creating a consistent visual language across all three buildings.

Waterfront Towers

7.336 The Waterfront Towers (T1 – T4) are located along the promenade and offer panoramic views of the water to the south, Canary Wharf to the north and distant views to the City and the River Thames to the West. The towers will be notably distinctive from the brick-clad Gateway, Courtyard and Northern buildings and the architectural language takes inspiration from Art Deco and contemporary references around the Docklands.

7.337 Buildings T1-T3 stand at 19, 23 and 27 storeys respectively, forming a gradual step down from the tallest tower T4 which stands at 31 storeys. The façade treatment of the waterfront towers is composed of a unitised curtain wall system with glazed fixed and opening windows, glazed doors, and light grey GRC cladding with a vertical ribbed texture. The overall reading of the massing of the towers is softened by rounded corners and residential balconies.

7.338 Slender horizontal banding on the waterfront towers adds visual interest in the articulation of the buildings. The light grey GRC cladding which is expected to have a lifespan of 60-80 years is panelised as part of the unitised curtain wall façade system. Vertical lines embedded into the cladding system seek to emphasis the lightness and verticality of the towers. Towers T1-T3 include dark grey metal accents to the balconies, balustrades and windows to allow elements of the towers to have synergy with the courtyard buildings.

Figure 36: CGI of Waterfront Tower T1 from southwest

Figure 37: Material palette for T1-T3

7.339 On the western façade, to mitigate against overlooking between adjacent balconies, a section of the balustrade extends to become a full height screen for additional privacy. The GRC banding along the base of the first floor and extended to the courtyard buildings expresses the floor slab locations and helps break up the verticality of the Towers' volumes. Similarly, aligning with the balconies of the towers, the light grey GRC spandrel flows around the curved corners of the buildings and contrasts with the vertically fluted GRC panels on the façade.

7.340 T4 has a larger and different footprint to buildings T1-T3 thus the verticality of T4 is enhanced through the composition of two vertical volumes. As it forms part of the same group of buildings as T1-T3, T4 also takes its cue from both Art Deco and contemporary references. The façade treatment of building T4 would, like buildings T1-T3, be composed of a unitised curtain wall system with glazed fixed and opening windows, glazed sliding doors and light grey GRC cladding with the same vertical ribbed texture. Building T4 will also incorporate rounded corners and slender horizontal banding to provide visual interest and break up the volume mass.

7.341 Where T4 differs from buildings T1-T3 (with the exception of the building footprint) is in the use of brushed bronze metal balconies, balustrades and windows to differentiate it from the remaining group of towers.

Figure 38: Close up CGI of building T4

7.342 The lower levels of T4 adopts a similar architectural language to the remaining towers and the courtyard buildings, proposing double-height glazing with coordinated coloured metal louvres. The residential entrances to T4 are marked using brushed bronze-coloured aluminium intended to also serve as a wayfinding feature.

School Buildings

7.343 The school has been designed to reflect the close urban grain of its immediate surrounding area. The maximum number of storeys of the school building when viewed from Westferry Road would be 5-storeys. However, due to the site's sloping topography in some views the school would appear to reach 4-storeys. The teaching wing is one storey lower than the main school building and will reach 3-storeys in height when seen from Millwall Dock Road and 4-storeys when viewed from Westferry Road.

7.344 The heights of the school buildings have been designed to be comparable to other buildings in the immediate surrounding area, the closest being Caravel Close and the Docklands Business Centre, albeit Caravel Close has a 2-storey wing closest to the school site.

7.345 The appearance of the school has been designed to balance a strong exterior outer skin of moulded concrete which wraps around the main school building on the upper levels and a more transparent façade treatment at the lower levels. The Westferry Road elevation will be part four and part five-storey and the main entrance to the school building will be set behind a double-height dining hall and school hall spaces and consist of a curtain wall system with copper aluminium mullions and louvres to articulate the façade.

Figure 39: CGI view from Westferry Road looking onto the Boulevard

7.346 The southern elevation of the school faces the Boulevard and the 5-storey teaching block and the 2-storey sports block are connected by a bridge link. The main teaching block will visually incorporate similar principles to the western elevation with the addition of the dominant library volume which forms an extruded double-glazed volume that protrudes slightly from the façade. The library has been designed to be open and transparent from the Boulevard and allow for generous views into the interior from the street. For consistency with the main school building, the sports block has been designed with low-level polished concrete and a concrete outer skin of moulded concrete at upper levels aligned to the level 01 datum throughout. The eastern and northern elevations of the school buildings will, like the other elevations, incorporate moulded concrete outer skins and a curtain walling system with louvres and copper mullions that provide articulation to the façade. The materials pallet for the school buildings can be seen in the image below.

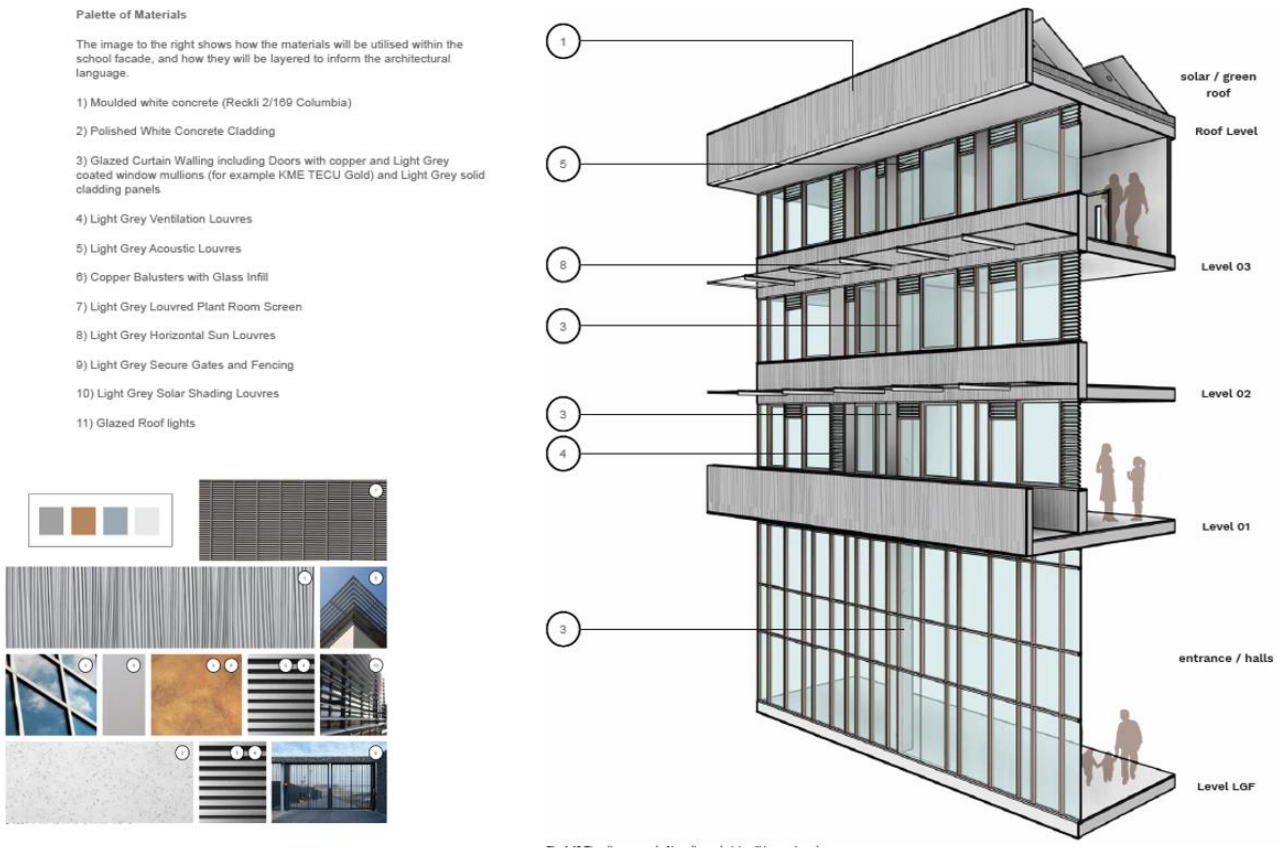

Figure 40: Materials palette for school buildings

Summary on Architecture and Appearance

7.347 In summary, Officers are confident and comfortable that the scheme would deliver very good design principles and that it incorporates appropriate strategies to address the base and upper levels of buildings and respond to different character areas proposed within the masterplan. Officers are satisfied that the Design and Access Statement accompanying this planning application and associated plans appropriately sets out how the delivery of quality buildings and associated public realm and landscaping could successfully be achieved. There are different façade treatments across the character areas of the masterplan and the use of a strong masonry palette with complementary colours assists in emphasising the dockside setting. The Art Deco character of the waterfront towers assists in differentiating the dockside towers from the rest of the masterplan. Place Shaping Officers have confirmed that whilst they consider that the Art Deco approach lacks relevance in this context, it is not to the detriment of the overall proposals and the relationship between the towers and the midrise buildings to the north is positive with a clear distinction between architectural language which works well.

7.348 It is noted that Sport England's objections relate to the internal and external layout and design of the school site. Namely, the size of the sports hall, size of internal storage provisions and changing room layouts. Sport England also consider the size of the MUGAs and artificial pitches should be amended to meet Sport England design guidance. However, the Applicant has advised that the school has been designed in accordance with the requirements of the DfE (Department of Education) who have not submitted any objections to the design and layout of the school site. As such it is considered that the site, layout and design of the new school is acceptable.

7.349 Overall, the overarching design principles within the scheme would ensure that the buildings have a positive relationship with each other and within different character areas of the wider masterplan. Full details of materials proposed to be used in the construction of the development (including the substation) will be secured via condition.

Safety & Security

7.350 Policy D11 of the London Plan requires all forms of development to provide a safe and secure environment and reduce the rear of crime. This is similarly reflected in Local Plan Policy D.DH2 which requires new developments to incorporate the principles of 'secured by design' to improve safety and the perception of safety for pedestrians and other users.

7.351 The submitted supporting planning application documents detail safety and security measures incorporated into the masterplan. These include (but are not limited to) access control to the Boulevard and into buildings for pedestrians; a 24/7 Central Estate Management Office (located within the ground floor of building C3); a dedicated parcel store for increased security; enhanced permeability of the site to be supported by adequate surveillance (including CCTV) and lighting and various layers of access control and security management to be considered for the basement.

7.352 The Applicant has engaged with the Metropolitan Police Designing Out Crime Officer prior to submission of the planning application and these discussions have resulted in the introduction of the police base within the masterplan. The Police Base will also be located at ground floor level of building C3 and near the Central Estate Management Office. The purpose of the police base is to provide a space for the Safer Neighbourhoods Team.

7.353 In terms of the secure by design measures for the secondary school, the submitted Design and Access Statement details that public areas within the school site boundary have been designed with secure, managed boundaries with access control. The main pedestrian route between the main school building and the sports block has been designed to maximise the width and be overlooked to increase light and visibility throughout the route. Hard-wearing concrete will be utilised on lower levels and the school's concrete façade will act as a hard boundary along the majority of the pedestrian routes. External lighting will cover all pathways, canopies, roads, ancillary areas and any external areas associated with the new development.

7.354 During the school's operating hours, visitors will need to report to the main visitor entrance located in the main school building where they will be required to sign in with school staff and visitors will be escorted by staff members around the school premises. The transition area between the main school building and the sports block has been designed to be safe and secure and separated from the public realm through the provision of a bridge crossing at level 02 of the school buildings.

7.355 The proposed development has been reviewed by the Designing Out Crime Officer who has requested that a relevant Secured by Design condition be imposed should planning permission be granted.

Fire Safety

7.356 Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. Policy D5(B5) of the London Plan states that new development should be designed to incorporate safe and dignified emergency evacuation for all building users. To this end, Policy D12 (Part B) requires Fire Statements to detail how the development proposal will function in terms of 6 criteria set out under Part B of this policy. The Mayor of London Housing Design Standards London Plan Guidance (LPG) (June 2023) contains a number of standards in relation to fire safety including that it is ensured that every apartment building has a safe and convenient means of escape and associated evacuation strategy for all building users (Standard B5.1) and requiring that developments meet the latest fire safety requirements introduced in Amendments to Approved Document B: Fire Safety relating to the Building Regulations 2010 (March 2024), including those for a second staircase on buildings that have a top storey of 18m or more in height.

7.357 The application has been accompanied by a HSE Planning Gateway One and London Plan Fire Statement and 3 x Outline Fire Strategies (courtyard buildings and the waterfront towers; gateway buildings; and northern buildings and school) all prepared by Kiwa Fire Safety compliance (KFS). These reports have been prepared by KFS based on a high-level review of the design information. Recommendations contained within these reports are expected to

be carried through in the detailed design stage of the development. The Outline Gateway One and London Plan Fire Statement addresses each of the criteria under Policy D12 (Part B) as follows:

7.358 ***Criterion 1 – The building's construction: methods, products and materials used, including manufacturers' details:*** The Fire Statement details that the main construction method for the proposed development will be reinforced concrete frame structures. Depending on the height of each building, any loadbearing elements of the structure will achieve the required fire resistance in terms of loadbearing capacity. For all buildings over 18m, fire-fighting shafts will be provided which are enclosed in 120-minute fire-resisting construction. All vertical shafts and risers will be designed to maintain the fire resistance of the floors they pass through and the residential part of each block will be separated from adjacent apartments and from protected corridors by 60-minute fire-resisting construction and the residential parts of each block will be separated from the non-residential areas by at least 120-minute fire compartmented walls and floors.

7.359 ***Criterion 2 – The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach:*** The Fire Statement states that in purpose-built blocks, special provisions are made to ensure that a fire is contained within the flat of origin and that common escape routes and stairways remain relatively free from smoke and heat in the event of a fire within a dwelling. The general fire strategy for the residential blocks is a stay put strategy and simultaneous evacuation of the entire building will not be necessary unless instructed otherwise by the attending fire rescue service. Escaping occupants will make their route to the stair via a corridor provided with smoke control systems and on the ground floor, they can reach the open air directly through the stair discharge or via the protected corridor.

7.360 In terms of the non-residential sections of the buildings, a simultaneous evacuation strategy will be adopted whereby all occupants in the fire-affected alarm zone will escape. In terms of the school building, both the main building and the sports block will be evacuated simultaneously in the event of a fire. An evacuation lift and firefighting lift will be provided to each residential core and disabled occupants affected by any fire would escape into the stair enclosure to await assistance or would escape directly via the evacuation lift. Within the school, disabled occupants would also escape via an evacuation lift or the stair. The evacuation lifts may be combined with the passenger lifts, subject to them providing the same functionality as an evacuation lift. The evacuation lifts in all blocks discharge at ground floor level into a protected lobby. This approach would also apply to the school buildings.

7.361 ***Criterion 3 – Features which reduce the risk to life: fire alarms systems, passive and active fire safety measures and associated management and maintenance plans:*** Each flat will be provided with a smoke detection and alarm system. Where a smoke control system is provided in residential communal areas such as corridors and stairs, an automatic fire detection system will be provided to activate such a system. The non-residential sections of the buildings will also be protected throughout with automatic fire detection and alarm systems as will the school buildings.

7.362 Residential areas in each building will be protected throughout with domestic sprinkler systems and non-residential areas and car parks will have sprinkler protection throughout. Any commercial units designed to shell and core will be provided with, as a minimum, a zone valve and capped connection to the commercial sprinkler system for future connection during fitting-out stage. The school will also have sprinkler protection throughout. Residential communal corridors and all firefighting shafts will be protected with either mechanical smoke ventilation systems or natural smoke extract systems and common stairs in each block of flats will have smoke ventilation systems. Any enclosed basement area will be ventilated via either natural smoke ventilation system or a mechanical extract system capable of providing 10 air changes per hour, handling gas temperatures of 300°C for a continuous period of not less than 60 minutes and operating automatically on activation of the sprinkler system or fire alarm system.

7.363 In terms of the school, the firefighting stairs and lobbies will also be protected with either mechanical smoke extraction system or natural smoke ventilation system. The basement of the school (which is separated into a northern compartment and southern compartment) will

have natural smoke ventilation at Level 0 of the northern compartment and smoke ventilation which is achieved via direct access doors from the yard on the west side of the building and main atrium at Level 0 of the southern compartment.

7.364 In the event of a failure of the main supply within the development, each life safety system will have an independent power supply that will operate the following systems: automatic fire detection and alarm systems, emergency lighting, firefighting shaft, all fans, actuators and controls associated with mechanical smoke ventilation systems, sprinkler systems and evacuation lifts. In terms of maintenance, fire safety systems will be maintained in accordance with the relevant British or European standards and an inspection, maintenance and repair manual shall form part of the fire safety manual and be incorporated in the building management plan.

7.365 ***Criterion 4 – Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these:*** The Fire Statement advises that access for the fire and rescue service will be provided in accordance with relevant guidance and legislation and includes the provision of fire appliance access points to the residential cores on the ground floor levels.

7.366 ***Criterion 5 – How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building:*** All the additional access routes provided around each building will be designed to meet British Standard recommendations (BS 9991[16] and BS 9999[17]). The Fire Statement advises that the roadways will, as a minimum, provide a 3.7m clear width, 3.7m vertical clearance height and a minimum load-bearing capacity of 14 tonnes. Fire service access within the curtilage of the site will be kept clear of any obstructions in order to provide appropriate positioning for the fire appliances in proximity to the entrance of the buildings.

7.367 ***Criterion 6 – Ensure that any potential future modifications to the building will take into account and not compromise the base build fire/safety protection measures:*** The Fire Statement recommends that all fire safety design information is recorded during the design and construction stage including but not limited to information concerning escape, fire compartmentation, and fire safety systems information. To ensure that the thread of information persists throughout the building life cycle, the digital record of these documents should be held by the operator of the building and transferred when building ownership changes.

7.368 As detailed earlier in this report, the courtyard buildings and waterfront towers are connected with a common basement. The submitted Fire Strategy details that the basement will be mechanically ventilated via a system which will need to be capable of providing 10 air changes per hour, handling gas temperatures of 300° for a continuous period of not less than 60 minutes, and operating automatically on activation of the sprinkler system or fire alarm system. The basement area will be treated as a single evacuation zone, whereby upon detection of fire in the zone, the entire zone will be evacuated. The stairs serving the basement are independent from the residential stairs and lead directly to open air.

7.369 The Fire Statement details that the proposal aims to provide fire protection for the basement EV charging facilities including the provision of sprinklers to reduce the rate of fire spread, and an automatic fire detection system with the fire alarm connected to the electrical power supply for the vehicle charging points so that the power is disconnected and they automatically switch off in the event of a fire. Separation distances between parked vehicles will also reduce the likelihood of fire spread to adjacent vehicles. As all the parking spaces will be designed to be accessible parking spaces, maximum separation between charging bays and the adjacent bays will be achieved.

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[16] BS 9991: 2015. Fire safety in design, management and use of residential buildings. Code of practice.

[17] BS 999: 2017. Fire safety in design, management and use of buildings. Code of practice.

7.370 The Fire Statement also recommends that any charging bays are located away from areas of high fire load i.e. bin stores. In the event that these are nearby, fire-resistant construction should be provided in order to separate the ignition risk from the EV charging points from the fuel load (bins). The Fire Statement confirms that the design proposals for the development achieves this. In terms of the location of EV charging points, the Fire Strategy confirms that given the number of emergency exits around the car park, the relatively short travel distances and the multiple exists available, the distribution of charging bays is not deemed to be an issue.

7.371 Buildings N1 and N2 will share a basement (undercroft) car park which will adopt similar fire protection measures as outlined for the larger basement beneath the courtyard blocks and the waterfront towers. The basement will be provided with natural smoke ventilation with nearly one-third of the basement car park uncovered and open directly to the open air. The basement area will be treated as a single evacuation zone, where if any fire is detected then the entire zone will need to be evacuated. In the case of an emergency, occupants from the car park can evacuate via either an open stair located on the southern side of the basement car park or the open car ramp leading to ground level.

7.372 Overall, Officers are content that the Applicant has demonstrated that the masterplan incorporates adequate fire safety measures in accordance with London Plan Policy D12 and neither the HSE nor the GLA have expressed any objections, in principle, to the submitted fire strategies. Officers will be seeking to ensure however, that detailed fire strategies are submitted as the design and construction of the development progresses. These will be secured via the imposition of appropriate conditions.

Design Conclusions

7.373 In conclusion, the proposal is considered to broadly accord with relevant development plan policies and the scheme is considered to be compliant with the development plan as whole. Officers are satisfied that the proposed masterplan as whole would deliver a scheme of quality design and landscaping demonstrating good urban design and placemaking principles within the masterplan. There are localised concerns in relation to parts of the masterplan i.e. the height of building E1 and impact on neighbouring amenities in terms of reduction in daylight and sunlight, however these impacts are considered to be outweighed by the regeneration benefits of the proposal.

PUBLIC OPEN SPACE/PUBLIC REALM, BIODIVERSITY AND ECOLOGY

7.374 Chapter 2 of the NPPF stipulates that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These objectives being: an economic objective, a social objective and an environmental objective.

7.375 The social objective is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Paragraph 96 of the NPPF requires planning policies and decisions to aim to achieve healthy lifestyles, especially where this would address identified local health and well-being needs, for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

7.376 Policy G1 of the London Plan expects development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Policy G5 of the London Plan requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also

recommends that predominately residential developments should achieve an Urban Greening Factor (UGF) target score of 0.4. Policy G6 of the London Plan requires developments to, amongst other things, manage impacts on biodiversity and aim to secure net biodiversity gain.

7.377 Policy D8 of the London Plan requires development proposals to, amongst other things, ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

7.378 At the local level, Policy D.DH2 of the Local Plan promotes the use of high-quality paving slabs, bricks and pavers for footways, parking spaces and local streets to create attractive, accessible, comfortable and useable development. Soft landscaping should be maximised to soften the streetscape and provide visual and environmental relief from hard landscaping, buildings and traffic. Policy D.ES3 of the Local Plan seeks to protect and enhance biodiversity in developments by ensuring that new developments maximise the opportunity for biodiversity enhancements, proportionate to the development proposed. Policies S.OWS1 and D.OWS3 of the Local Plan seek the delivery of new publicly accessible open space on-site which should, amongst other things, be visible and accessible from the public realm surrounding the site and be of a high quality and inclusive design and provide facilities to promote active recreation and healthy lifestyles.

7.379 Policy G4 of the London Plan requires development proposals to, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. Policy S.SG1 of the Local Plan directs new developments within the borough towards Opportunity Areas and highly accessible locations which have good links to public transport, walking and cycling networks and local services. Part 7 of the policy requires developments to support the delivery of significant new infrastructure to support growth within the four sub-areas of the Local Plan, including social infrastructure such as schools, open space, health centres and leisure facilities.

7.380 Site Allocation 4.12 (Westferry Printworks) requires that a minimum of 1 hectare of strategic open space should be provided.

Public Realm and Landscaping Strategy

7.381 The proposed development will provide a variety of landscaped/public realm and public open space areas including parks/open lawn areas, public squares, a promenade, active linear plazas which include tree planting and lawn areas, children's play areas and a community food growing garden. Also included within the overall landscaping strategy are residential courtyards located at ground and podium levels.

7.382 The overarching landscaping and public realm strategy is intended to be cohesive and unified with specific character areas and spaces. The proposed landscaping masterplan and character areas of the landscaping strategy across the masterplan are shown in the images below:

Figure 41: Proposed landscaping masterplan

Figure 42: Landscaping Character Areas

Park East and Printworks Plaza

7.383 Park East will comprise the largest open green space within the proposed development. Park East measures 0.65 hectares in area and is located on the eastern edge of the site and north of tower T4. This area of public open space includes open lawn areas, woodland planting and a dedicated children's playground. The woodland gardens will provide year-round seasonal interest with richness in colour, texture and biodiversity allowing for the creation of habitats for birds and insects. The open lawn area can be used as flexible recreation space by the local community. The park will have a direct connection to the ground floor uses of buildings C3, T4 and E1.

Figure 43: Illustrative view of Park East looking south west towards Promenade Place

7.384 It is intended for Park East to feel like a generous park with a variety of tree species, woodland planting and species-rich lawns. The green space would be edged by a play area and more intimate gardens with seating in key locations. To the east of the lawn, a destination play space is proposed which is defined by the Woodland Walk beyond, which provides a route from the Boulevard to the dock. The Woodland Walk would be well-maintained and well-lit

ensuring that it provides an ecologically rich character area of the park with opportunities for reading, relaxing and contemplation.

7.385 The Printworks Plaza is situated to the west of building E1, at the intersection of Park East and the Boulevard. The square is hard-surfaced and will provide a flexible space that can accommodate food trucks, coffee carts or other installations. Columnar trees will be deployed to create a setting that complements the character of the Boulevard and Park East.

Promenade Place and the Promenade

7.386 Promenade Place is an area of public open space that provides a physical continuation of Park East and overlooks the water to provide a contemplative garden. It is one of the main public spaces linking to the Promenade and sits on the eastern part of the site between towers T3 and T4. Promenade Place measures 0.2ha in area and will be one of the main public spaces directly adjacent to the water. The space incorporates a flush lawn area that can be used for lounging near the edge of the water and an attractive garden space on the western edge to create a quieter space near the residential entrance. Direct routes are maintained through the space with seating areas. Planting incorporated into the gardens will include a mix of evergreen species, emerging bulbs, shrubs and perennial planting. Small, multi-stem trees will also be deployed to provide a sense of human scale for the space. Promenade Place is intended to have a strong relationship with the internal uses of the buildings at ground level with the edges of the space having the ability to serve as additional space for ground floor spill-out.

Figure 44: Illustrative view of Promenade Place looking west

7.387 In terms of the promenade, the existing tow path will be widened into the former Westferry Printworks site to form an upper promenade to allow people to be in close proximity to the water. The upper level of the promenade will allow for spill-out space for active frontage and promenading and the lower level will prioritise walking, jogging or sitting on the steps. There will be 1:21 graded routes provided to connect the two promenade levels.

7.388 The 350m long promenade will form a key element of the entire public realm, as it interfaces with all the significant spaces on the site. The promenade has been designed to ensure that

there is an unobstructed linear route along the edge of the dock for pedestrians and for Canal and River Trust access. The Design and Access Statement details that the promenade will be attractively lit, whilst considering ecological impact to wildlife, and that materials deployed should be high-quality, durable and reflect the industrial and maritime history of the site.

Figure 45: Illustrative view of promenade looking east in front of T2

7.389 Where the promenade meets Westferry Road on the western edge of the site, there is a level change and therefore access will be achieved with a 1:21 graded route. To safeguard the development from possible flood events, it is proposed to raise the levels along the upper promenade from 4.9m to 5.28m AOD. This level change is articulated by two steps which can also be used as informal seating along the length of the promenade. The upper promenade, which will also include 2 pocket parks, will have a different appearance and materiality to the lower promenade.

Spines

7.390 The eastern and western spines connect the promenade through the site to the Boulevard to the north. These spaces measure 0.14h (eastern spine) and 0.18h (western spine) and are designed to provide curated areas of activity for the use of residents, commercial tenants and visitors to the site. Elements that could be included in these spines include table tennis, hammocks and lawn games. The planting strategy within the spines will comprise a strong evergreen planting strategy to soften the spaces throughout the year and provide a structure for the various activities taking place within these parts of the masterplan.

Figure 46: Illustrative view of spine public realm looking north

7.391 Tree planting will have a light canopy to allow daylight into the spaces and smaller multi-stem trees will be deployed to provide an intimate scale to the spaces. The lawn areas within the spines can be used for lunchtime spill-out spaces and picnics. The spines will span a width of 21m which will allow for 4-5 metre wide hard-surfaced footpaths on either side of the central green spaces to allow for pedestrian footpaths.

Dockside Gardens

7.392 Dockside Gardens provides an open, flexible green space overlooking the water on the south-western part of the side and straddling the area between buildings W1 and T1/C1. To the south lie the existing industrial cranes along the dock edge. The design of Dockside Gardens seeks to maximise the south-facing aspect and orientates views to the water and industrial cranes.

7.393 The open lawn area provides open space that can be used flexibly, providing opportunities for picnics, light recreation and community gatherings. The northern and eastern edges are intended to be more active, with picnic tables and seating. The northern edge will also provide outdoor gym equipment placed amongst a grove of birch trees.

Figure 47: Illustrative view of Dockside Gardens looking southeast across the dock

7.394 There would be a level change between Dockside Gardens and the Boulevard and access from the space from Westferry Road will incorporate a 1:21 graded route. Generous seating opportunities would be orientated towards the water overlooking an area of seasonal planting. A 1:21 graded route will also be provided at the southern edge to access the lower promenade.

The Boulevard and Boulevard Green

7.395 The Boulevard comprises the primary east/west route through the site and has been designed to keep vehicular traffic volume low and prioritise pedestrian activity. This linear route has been designed to provide opportunities for spill-out spaces from ground floor uses with seating and gathering areas at 50m intervals. Along the route, it is proposed to provide rich, colourful and diverse rain garden planting to help absorb surface water drainage and provide habitable areas for birds and wildlife. Trees will be planted along the length of the Boulevard to help create an attractive spine route through the masterplan.

Figure 48: Illustrative view of boulevard looking west

7.396 Boulevard Green will sit directly north of the Boulevard and measure 65 x 25m. The aspiration of the masterplan is that this space will have a strong community presence with opportunities for destination play and community food-growing facilities in the form of small allotment patches at the far western end of the green. Boulevard Green has been designed to appear as an extension to the Boulevard, with seating areas, tree planting and sloping landforms to encourage informal play. A large proportion of the green will comprise a large green play area which will comprise a single play feature such as a stacked timber play element which will form the main feature in this space. Smaller elements such as jumping logs, natural play boulders and a toddlers' sand pit will further enhance the play experience.

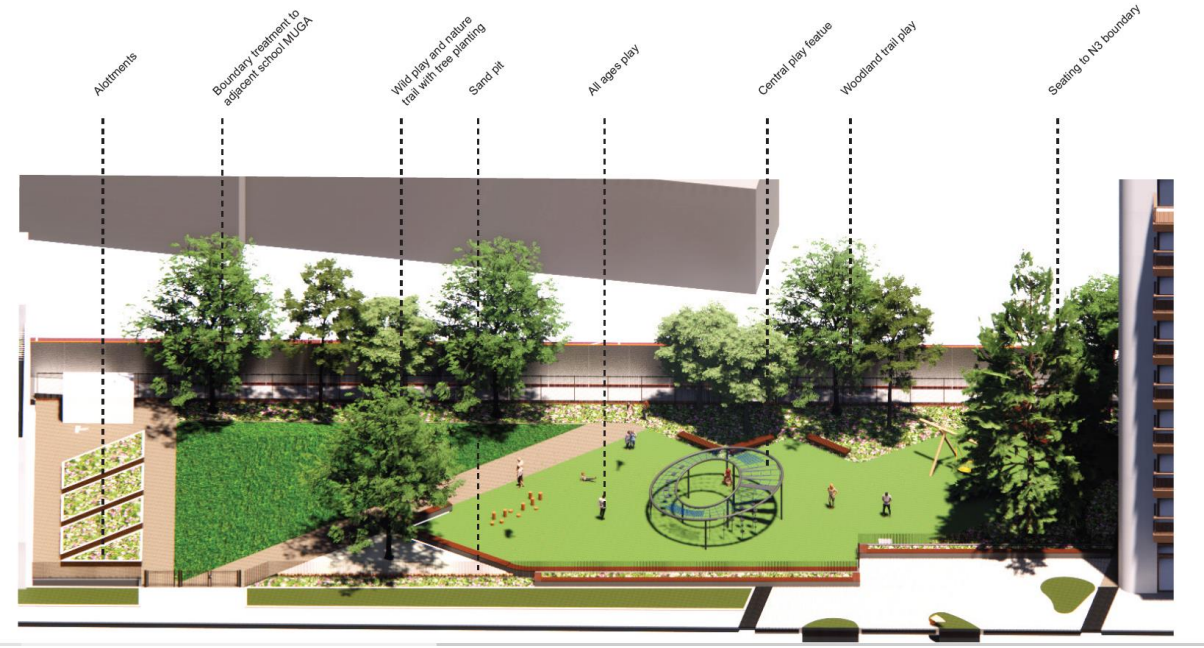


Figure 49: Illustrative image of Boulevard Green

7.397 On the western end, a sloping landform, which is orientated towards the play area, provides an open lawn area for parents and allows opportunities for surveillance over to the play area.

7.398 In terms of the materials strategy for the Boulevard, this is intended to be a pedestrian-friendly shared surface route and the materials palette will be utilised to create a chevron pattern along its length to provide direction and segregation without the need to use white lines, road markings or highway signage.

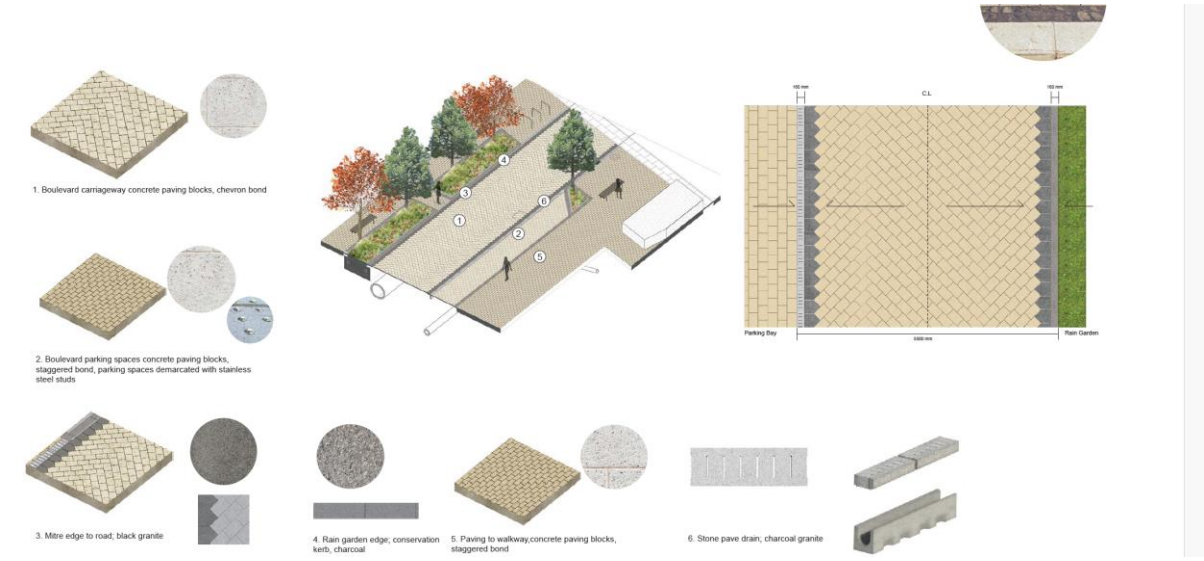


Figure 50: Proposed materials palette for Boulevard

Westferry Plaza

7.399 Westferry Plaza sits directly west of the school building and is bound by Westferry Road. This area of landscaping and public realm is intended to mark an arrival point from the west and allow opportunities for social interaction for parents and children to congregate at the main entrance to the school. It is intended that Westferry Plaza appears as an extension to the Boulevard, with clustered tree planting, opportunities for seating, perennial planting and a similar palette of hard surfacing materials to that seen in the Boulevard.

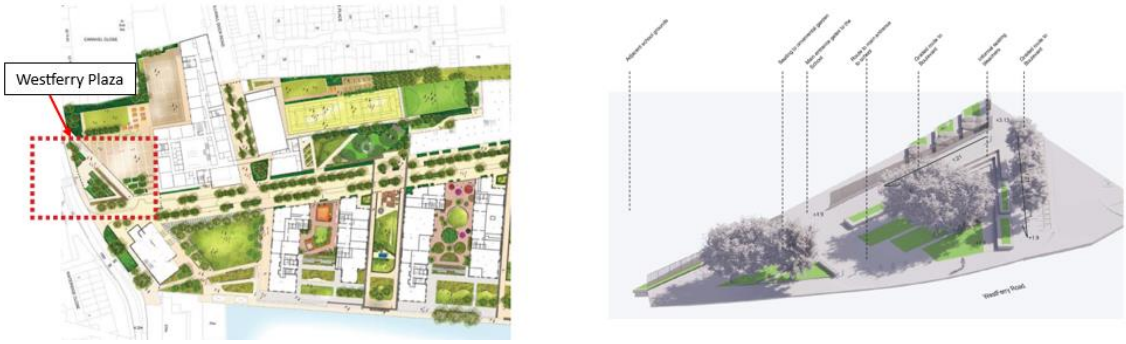


Figure 51: Illustrative image of Westferry Plaza

7.400 There is a 1.23m level change from Westferry Road (1.9m AOD) to the Boulevard (3.13m AOD) and therefore two 1:21 graded routes are weaved into the plaza with opportunities for seating provided in the form of bleacher-style seating.

Podiums

7.401 The podiums will form three semi-private courtyards to provide quiet spaces for recreation, relaxation and socialising with south-facing aspect overlooking the promenade and the dock. The look, feel, character and function of these spaces will differ from the wider public realm. Each of the courtyards will have a different appearance but will largely be composed of a similar set of uses and landscape typologies, i.e. seating, incidental play elements, lawns, plantings and tree planting.

7.402 The courtyards have been designed to ensure that the spaces can be used flexibly providing opportunities for picnics, recreation and relaxation and outdoor dining opportunities. Podium C1 will provide an interlocking lawn area and a raised seating edge with multi-stem tree planting. Podium C1 will also incorporate incidental play, areas of planting and seating to encourage communal outdoor dining. Seats and loungers at Podium C1 will overlook the water and provide views across to the promenade.

7.403 Podium C2 incorporates circular lawn and planting areas to encourage different ways for people to use the spaces which include an open lawn area, a birch grove and herbaceous planted areas. The use of multi-stem trees in stand-alone planters will also soften the space and provide intimate spaces to sit beneath the canopy of a tree so as not to be overlooked from the residential balconies above. Podium C3 adopts similar design principles as Podium 1 and 2 with areas for play and a central lawn space which is defined by evergreen hedges to create intimate settings at podium level.

Figure 52: Illustrative view of Podium C2 looking south towards the promenade

School

7.404 The school playground sites are divided into two parks: the main play space at the main entrance from Westferry Road; and the other park which is sited to the north of Boulevard Green and the MUGAs. The western side of the school provides casual/informal play opportunities and includes a large plaza, pergola, lawn, planted terraced seating and biodiverse planting areas. Formal play is included in the form of a hard-surfaced MUGA.

7.405 The eastern side of the site provide further formal play opportunities with the inclusion of the two MUGAs and the 5-a-side football pitch. Further biodiverse planting areas, a growing garden and an orchard are proposed along the northern edge of the school site.

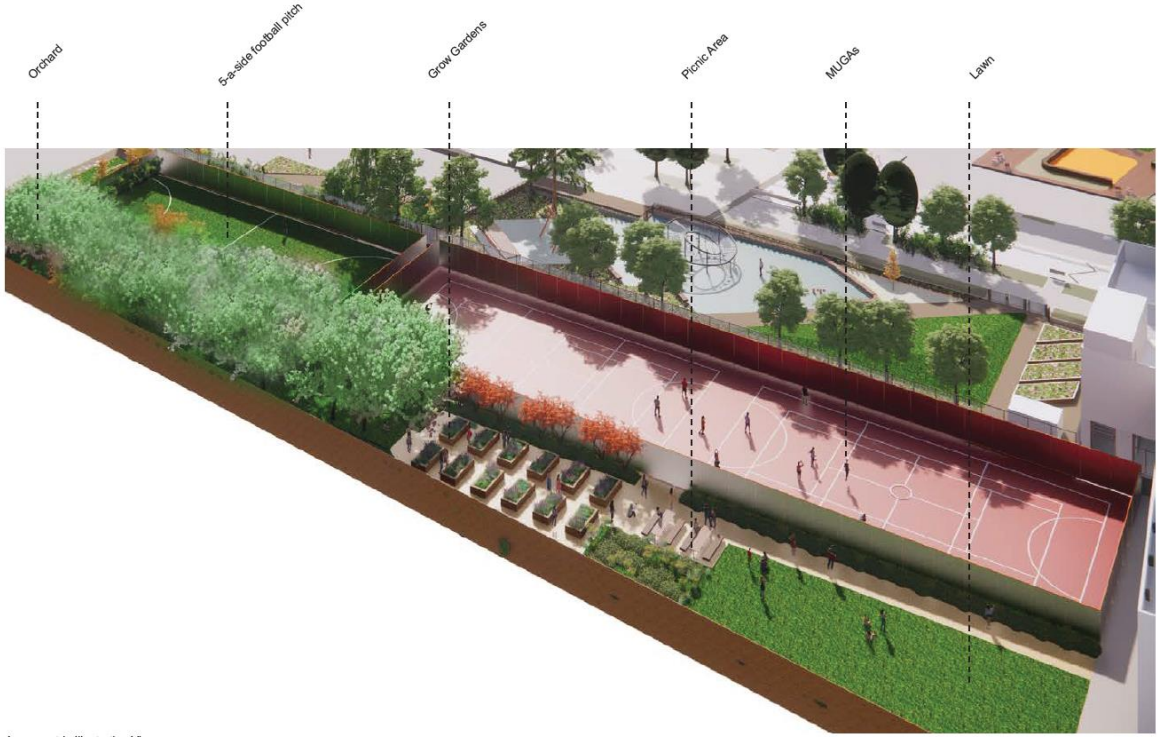


Figure 53: Illustrative view of eastern part of the school site

Public Open Space

7.406 The distribution of public open space across the masterplan is shown in the image below. The scheme proposes to provide 2.08 hectares of public open space across the masterplan as a whole. This would equate to 33% of the overall site area (including the school site). Included within this calculation are areas designated as play within publicly accessible open space which total 4,185sqm. If the areas of designated play are discounted from the overall quantum, the area of public open space is 16,573sqm (1.65 hectares) .

Figure 54: Distribution of public open space

7.407 The overall quantum of public open space exceeds 1 hectare and therefore accords with the Local Plan policy in this regard. It is noted that the quantum of public open space (excluding areas within the masterplan designated as play within publicly accessible open space) will be lower than the quantum of public open space secured under the extant planning permission (1.95 hectares). This is largely as a result of introducing an additional building (building E1) within the masterplan. Notwithstanding this, the overall quantum of public open space substantially exceeds the minimum requirement as required by the site allocation, and across the masterplan, the areas of public open space would be varied in character as detailed earlier in the landscaping and public realm section of this report.

7.408 Some of the key public open spaces within the masterplan are generous in size, spanning areas (including paths and walkways) of 43m x 55m (Dockside Gardens), 90m x 67m (Park East), 46m x 43m (Promenade Place) and 67m x 20m (Boulevard Green) and the overall public open space strategy retains the same character area principles as the extant planning permission.

7.409 Officers had expressed concerns to the Applicant that Park East, which would be the largest area of public open space, will not be delivered until the final phase of the construction programme which would be Phase 4 (2028). By completion of Phase 3, there would be 1083 new homes delivered. The Applicant has advised however that the phasing of the scheme has been set following review of detailed technical, logistics, safety, operational and marketing implications. Phase 1 will bring forward blocks T3 and C3 as these blocks hold the management suite and the main communal amenity facilities. Phase 1 will also deliver blocks N1 and N2 which are both affordable rented blocks thus prioritising the delivery of affordable rented units (100 affordable rented units). The Applicant has also advised that the positions of the Phase 1 blocks also provide separation from the school site and the logistical challenges of its development which is likely to be brought forward by the DfE at the same time as Phase 1. Phase 1 will also deliver the Westferry Plaza public open space and the dockside promenade.

7.410 The Applicant contends that it is logical to allow access to completed buildings via the Millharbour site access route whilst construction is serviced via Westferry Road. Phase 2 continues with the delivery of on-basement blocks (buildings C2 and T2) and completes the N block cluster of buildings with the delivery of N3 which will also be wholly affordable rented (96 affordable rented units). Phase 3 completes the major on-basement blocks (buildings C1 and T) and delivers the final affordable rented block in W1 which will deliver 59 affordable rented homes. This would then allow for Phase 4 to be completed.

7.411 Whilst the Applicant acknowledges that the largest park (Park East) does not come forward in a completed manner until the final phase of the construction programme, the Applicant has advised that Phase 1 will deliver a proportionally larger area of public open space than the number of residential units coming forward in Phase 1 (459 units/34% of total homes) with the total strategic public open space being provided within Phase 1 equating to 41% of the total provision. By completion of residential units in Phase 2 (853 units/63% of total homes), only 47% of the total strategic public open space would be delivered. However, by the completion of residential units in Phase 3 (1083 units/80% of total homes) the delivery of public open space would equate to 65% with full delivery to 100% on completion of Phase 4. It should be noted however, that the percentage of public open space being delivered proportionate to the number of dwellings per phase does not include the delivery of any private amenity space, semi-private amenity space or children's play space.

7.412 It should also be noted that whilst there is an anticipated 7-year construction programme, in reality there will be overlap between all the phases with Phase 1 completing only approximately 10 months before the commencement of Phase 4. The overlap between phases is demonstrated in the indicative construction programme below as set out in the submitted Environmental Statement.

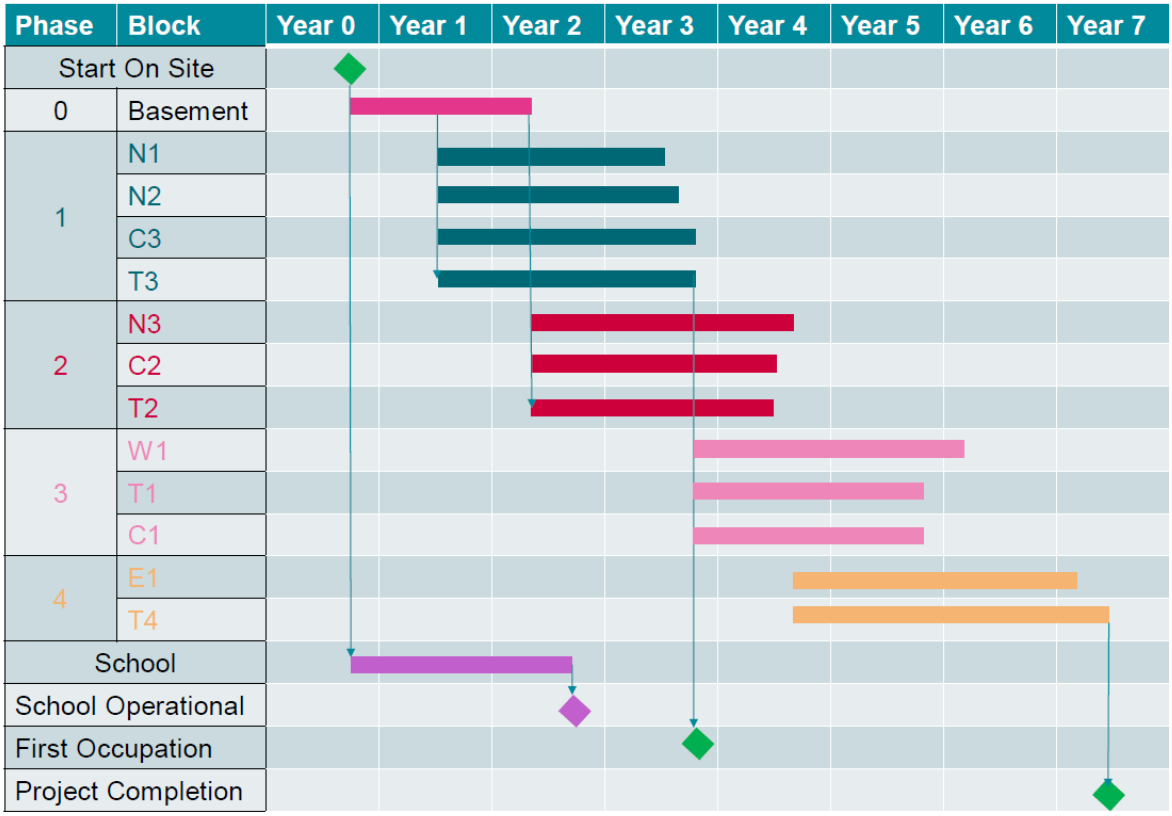


Figure 55: Indicative construction programme (Year 0 is 2024)

7.413 Officers note that the Applicant has suggested that some temporary public open space could be provided in Phase 4 for the middle phases. Based on the Applicant's construction programme, this would be a limited provision and there may be risks associated with the creation of a freely accessible public space surrounded by construction and other commercial uses. However, Officers consider that the provision of temporary public open space or similar is not an unusual scenario on large construction sites and that notwithstanding the indicative construction programme that there is merit in ensuring that at the very least a feasibility study for meanwhile/temporary public open space provision is explored by the Applicant. Officers would therefore be seeking to secure this via the S106 legal agreement should planning permission be granted. On this basis Officers would be satisfied that the disadvantages of delivering Park East in the last phase can be adequately mitigated by providing temporary public open space to supplement the phased delivery of the public open space being secured as part of this development. This would be secured via the S.106 legal agreement.

Biodiversity

Tree Planting Strategy:

7.414 The site in its current form is largely hard-surfaced with the exception of overgrown weeds and 8 London Plane (Platanus x hispanica) trees located on the dockside towpath (within the Canal and River Trust land ownership) which, whilst in the application red line boundary, is currently separated from the former Westferry Printworks site by a security fence. The submitted Arboricultural Impact Assessment classifies the 8 London Plane trees as being Category B trees and have identified these trees for removal. The report confirms that the London Plane trees are 'substantial' trees with a mature height exceeding 26 metres which have a 'moderate' water demand.

7.415 The removal of these trees has been identified as they do not have sufficient tree pits to support the size of these trees. This has resulted in the roots seeking moisture accumulating on the underside of the hard-surfaced towpath resulting in mechanical damage to the wearing course. As a result, the Arboricultural Assessment reports that there has been direct damage to the towpath from invasive roots, leading to general health and safety implications for

pedestrians from uneven paving slabs and low hanging branches, costly infrastructure repairs, ongoing maintenance and potential physiological damage to the trees themselves.

Figure 56: Photographs of existing towpath and conditions around trees

7.416 As such it is proposed to remove the London Plane trees and replace them with mature trees of similar future stature and amenity value with appropriate root containment and maintenance infrastructure installed prior to the point of planting. This will preserve and enhance the long-term benefit of trees along the dock path.

7.417 Across the site as a whole, the masterplan will introduce 458 new trees to replace the 8 London Plane trees which are not well-suited to their current location. A range of tree species are proposed including Liquidambar (Sweetgum) and Gingko Biloba (Maidenhair Tree) which have been selected for their striking form and autumn colour whilst Amelanchier (Juneberry or Serviceberry trees) and Cornus kousa (Chinese Dogwood) trees have been selected for their aesthetics in spring, whilst providing multi-stem smaller-scale trees. Poplars are also proposed to act as strong structural species and assist in removing air pollutants whilst Pinus sylvatica (Scots Pine) and Tilia europea (European Common Lime) are strong native species that are intended to give a sense of maturity to the overall site. Cherry trees have been selected throughout the site which will have the greatest impact during the spring season.

7.418 In terms of the lower promenade and the replacement of the existing 8 London Plane trees, it is proposed to select trees from the following indicative species in the first instance, however the Applicant is open to discussions and suggestions of alternative species from the Tree Officer: Liriodendron tulipifera (Tulip Tree), Acer campestre (Field Maple), Ginkgo biloba and Liquidambar. Images of the indicative tree species proposed are shown in Appendix 4 of this report.

7.419 The Council's Arboricultural Officer initially objected to the removal of the 8 London Plane trees but has now confirmed that the outline proposals will provide adequate mitigation for any tree loss and is happy with the proposed planting methodology and outline species selection to replace the lost trees subject to the planting of a minimum stock size of semi-mature trees. The Council's Biodiversity Officer has advised, however, that they would like to see a greater degree of native species than that which is currently proposed and would seek to ensure that at least 50% of the new trees are of the native variety. The Biodiversity Officer has no objections in principle and therefore Officers will be seeking to secure that the above matters raised by both the Arboricultural Officer and the Biodiversity Officer are addressed via the imposition of suitably worded conditions to secure detailed landscaping proposals for the site.

Biodiversity:

7.420 The proposal will have the potential to deliver a Biodiversity Net Gain of 18.87% from the current baseline value of the site and this is supported and welcomed by Officers. The habitats present prior to the site clearance consisted of large areas of low-value habitats in the form of hard-standing, buildings and amenity grassland, with smaller areas of more distinctive habitats such as scattered/dense scrub The masterplan proposes significant ecological and biodiversity enhancements across the site compared to the existing condition and these include the creation of a range of semi-natural and ornamental habitats which will increase the biodiversity potential for the site, Additional enhancements include: a minimum of two bat boxes to be placed onto buildings and/or mature trees; a minimum of two bird boxes to be placed onto buildings and/or mature trees; a number of log piles and/or scattered trees will be created within areas of species-rich grassland; and a number of green roofs (both biodiverse and intensive) are proposed and will include a range of native pollinating plants and areas of rubble/bare earth to encourage natural succession and use by a range of invertebrates and birds.

7.421 A number of urban street trees will be placed within areas of grassland, along the boundaries of the site and throughout the site as individual trees. Other habitats included within the landscaping include the provision of shrubs, raingardens and species-rich native hedgerows. The Council's Biodiversity Officer has no objections in principle to the proposed biodiversity and ecological measures, however, they have questioned the inclusion of some non-native species and the species of native hedge proposed for the school grounds which produces toxic attractive-looking berries. However, these matters can be addressed via the imposition of suitable conditions to secure a site-wide ecology strategy. Detailed ecology and landscaping plans detailing biodiversity enhancements for each phase of the development will also be secured via condition should planning permission be granted for this development.

7.422 In terms of the Urban Greening Factor (UGF), this is a tool introduced by the London Plan to evaluate the quality and quantity of urban greening. It enables major developments to demonstrate how they have included urban greening as a fundamental element of site and building design from the outset. The Urban Green Factor proposed for the scheme is indicated in the image below. The development originally proposed an urban greening factor of 0.4 which complied with London Plan Policy G5 of the London Plan.

URBAN GREEN FACTOR

Surface Cover type	Factor
Semi natural vegetation (eg. Woodland, flower-rich grassland) created on site	1
Wetlands or open water (semi-natural; not chlorinated) maintained or established on site	1
Intensive green roof of vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm	0.8
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO code 2014	0.7
Flower-rich perennial planting	0.7
Rain gardens and other vegetated sustainable drainage elements	0.7
Green wall - modular system or climbers rooted in soil	0.6
Hedges (line of mature shrubs one or two shrubs wide)	0.6
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	0.6
Groundcover planting	0.5
Amenity grassland (species-poor, regularly mown lawn)	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0.3
Water features (chlorinated) or unplanted detention basins	0.2
Permeable paving	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0

Figure 57: Urban Greening Factor

7.423 However, there were areas of planting overlapping with areas allocated to play which were identified as semi-natural meadow. Were these areas to remain as meadow this would have meant that these areas would not have been useable for allocated play purposes. As such these areas have been replaced by amenity grassland (regularly mowed lawn) and the UGF recalculated accordingly to 0.385 which is marginally below the 0.4 as required by policy. However, to ensure the effective use of allocated play areas, Officers accept this shortfall and consider the UGF to be acceptable.

Ecology

7.424 Policy D.ES3 of the Local Plan also seeks to ensure that development does not affect a Site of Importance for Nature Conservation (SINC), or significantly harm the population or conservation status of a protected or priority species. Chapters 14a and 14b of the Environmental Statement assess the environmental impact of the proposed development on important ecological and nature conservation features.

7.425 The ES confirms that are no National Statutory Designated Sites within 2km of the proposed development and no Internationally Designated Sites within 5km of the proposed development. There are four Local Nature Reserves (LNR) within 2km of the site: Mudchute Park Farm, Russia Dock Woodland, Stave Hill Ecology Park and Lavender Pond. There are also 8 non-statutory designated sites within a 1km buffer of the proposed development which are SINCs including Millwall and West India Dock.

7.426 In terms of habitats within the site, the baseline assessment reveals that approximately 47 species of habitats were recorded, all of which were considered to be of local value. One building within the site was assessed as providing moderate suitability for roosting bats; however, no roosts were recorded within the building during surveys undertaken in 2023. No protected, notable or common species of birds were noted as utilising the habitats within the site during the Extended Phase 1 Habitat Survey undertaken. The existing habitats are unsuitable for most nesting birds given the cleared nature of the site and as such the baseline assessment identifies that the overall value for nesting birds is local only. In terms of invertebrates within the site, a list of 156 species were recorded; however, all species have been identified as being common on brownfield sites and to be of local value.

Construction Phase

7.427 The ES reports that during the construction phase of the development, indirect effects on the Millwall and West India Dock SINC could occur through surface water run-off and cooling, overshadowing, air quality and noise. The existing dock is overshadowed and its key value lies in flora associated with dock wall and edges, plus gulls and other common urban aquatic bird species loafing and feeding in the open water. The docks also support a limited number of fish species. The ES reports that the impact on the SINC, without appropriate mitigation and compensation, would result in a temporary Minor Adverse (Not Significant) effect at local level.

7.428 The assessment reports that Jersey Cudweed was also found to be present on the site which is listed on the Greater London Rare Plant Register and on Schedule 8 of the Wildlife & Countryside Act 1981 and is protected. The loss of this species without appropriate mitigation and compensation would result in a long-term Moderate Adverse effect (Significant).

7.429 In terms of disturbance of communing/foraging bats, and the habitat loss and disturbance of nesting birds, the ES assesses the effects of the proposed development during the construction phase as being Negligible (Not Significant). With regards to the habitat loss, disturbance and mortality of invertebrates, construction will result in the clearance of vegetation on site that support a suite of invertebrate species. In the absence of mitigation, the proposed development would result in long-term Minor Adverse effect (Not Significant) at a local level.

Completed Development

7.430 Once completed, the proposed development could result in an increase of recreational pressure on Mudchute Farm LNR. However, the proposed development will provide approximately 2.1 ha of publicly accessible open space and these spaces will also provide habitat-rich gardens, plazas, dockside gardens and landscaped podiums contributing to the public open space provision in the area. The assessment concludes therefore the impact on the Mudchute Farm LNR, without appropriate mitigation and compensation, would result in a temporary, Minor Adverse (Not Significant) effect at the local level. In terms of disturbance of commuting/foraging bats from light spill, the ES reports that with embedded mitigation measures (i.e. use of LED lighting, motion sensor lighting and lowest lux lighting) for light spill applied, the resulting likely effect is considered to be Negligible (Not Significant). Nesting birds could be impacted during construction works, however embedded mitigation in the CEMP (Construction Environmental Management Plan) will ensure that vegetation removal and building demolition will take place outside of the bird nesting season (1st March to 31st August). As such, the impact on nesting birds is assessed as Negligible (Not Significant).

Impact on Millwall and West India SINCs:

7.431 In terms of the Millwall and West India Docks SINCs, the proposed development would result in increased human presence and activity around the docks, however the bird life of the docks SINC is very limited to a handful of common species, all of which are accustomed and acclimatised to human activity.

7.432 The proposed energy strategy for the development utilises a site-wide ambient loop heating network supplied by a centralised dock water source heat pump from the adjacent Millwall Outer Dock. This system will involve extraction of heat from the dock in winter but most of the time would use abstracted water to cool the proposed development. Extraction and discharge of water into the dock will be via three intake/outfall pipes. Thermal plumes can potentially cause changes in the abundance of macrofaunal species and alter benthic community composition. Higher temperatures can also encourage the colonisation of non-native species. However, the ES reports that the sensitivity of species recorded in the dock to changes in temperatures is considered to be low as they are already subject to variable temperatures throughout the year and most species are considered tolerant to the predicted changes in temperature that will occur as a result of the thermal plume. The importances attributed to species are judged to be low given that they are commonly occurring and of low conservation value and as such the overall effect on benthic habitat and species would be Minor Adverse (Not Significant).

7.433 The Millwall Dock supports a wide range of fish species which are commonly occurring in the local region. Fish occupy a certain preferred temperature range at which they function best (thermal preferenda) with deviations out of this range having potential consequences for growth and reproduction. The assessment of the effects on fish species has been informed by the results of a thermal response and plume modelling study undertaken in Millwall Dock on behalf of the Canal and River Trust (CRT) and was based on an agreed approach advised by the CRT and the Environment Agency. This agreed approached considered the heat exchange system for the Appeal Scheme.

7.434 The ES reports that the discharge is predicted to increase temperatures at the outlet by approximately 4°C above ambient levels during the summer months. However, thermal plumes are predicted to rapidly dissipate to within 1°C of ambient levels away from a relatively localised area from the discharge outlet. Even in the direct vicinity of the outlet, the thermal discharge will be within the temperature range that species in the dock are known to inhabit. The assessment summarises that, when assessed against established criteria, none of the predicted thermal loads that were modelled lead to simulated dock average temperatures above 28°C[18] or 23°C[19] at any time.

[18] Freshwater Fisheries Directive cyprinoid threshold.
[19] The Water Framework Directive threshold.

7.435 As the Millwall and West India Dock system comprises an enclosed water body that has relatively limited water exchange with the River Thames, no temperature changes are predicted with respect to the River Thames as a result of thermal discharges due to the heat pump. Overall, the thermal plume will only cause highly localised changes in water temperature with changes away from the direct vicinity of the outlet not exceeding the known species tolerance ranges or the applied ecological thresholds for fish species in the dock. The ES concludes that the magnitude of impact and exposure to change would be low. The sensitivity of fish in the docks to changes in temperature would be low to medium as temperatures above the tolerance limit of a species or longer-term changes can adversely affect species and as such the impact on the docks from discharge of thermal plume from the heat exchange system is assessed as Minor Adverse (Significant).

7.436 There is the potential for ingress of fish species into the intake of the heat exchange system if they swim in close proximity and the sensitivity of fish species to ingress range from medium to high (depending on the species and fish size) with the importance of certain fish species being high (such as European eel). On this basis, the impact is assessed as Moderate to Major Adverse (Significant).

Mitigation Measures

7.437 In order to minimise potential impacts during the construction phase of the development the following mitigation measures are proposed:

- Standard industry good practice procedures and pollution prevention guidelines to be detailed in a CEMP.
- To minimise significant adverse effects associated with the introduction and spread of non-native species during construction and completion of the development, a Biosecurity Plan will be produced in accordance with the Marine Biosecurity Planning Guidance for England and Wales.
- An Ecological Management Plan and Landscape Environmental Management Plan will confirm the detail of ecological mitigation, compensation and enhancement features proposed for the development.

7.438 Mitigation measures following completion of the development will also include the use of luminaire shielding to help reduce artificial lighting effects and limit light emissions near the dock side. To minimise the significant adverse effects associated with the risk of fish entrainment at the heat pump intake, a fish screen will be fitted. Fish screens are designed to protect fish by preventing them from swimming or being drawn into intakes. Incorporating this mitigation, the significance of effects for potential entrainment of fish in the heat pump intake would be Minor Adverse (Not Significant).

7.439 The proposed development will include the inclusion of a mixture of grassland habitats, trees and shrubs with diverse planting to encourage pollinators, which will in turn provide a food source for commuting and foraging bats. A number of bat boxes to increase roosting opportunities will be incorporated into the development. Extensive biodiverse green roofs will also be provided which will be suitable for black redstart foraging and breeding and for use by other bird species and invertebrates. The provision of a number of bird boxes and nesting structures (including those suitable for black redstart) will also be incorporated into the development.

7.440 The Terrestrial and Aquatic Ecology Chapters of the ES (Chapters 14a and 14b) have been reviewed by the Temple Group who, subsequent to clarifications sought, agree with the significance of effects assessed in the ES. Mitigation measures described above will be secured via the imposition of appropriate planning conditions which will include the requirement to submit a Jersey Cudweed Strategy which details how existing Jersey Cudweed will be translocated.

Conclusions on Public Open Space/Public Realm Ecology and Biodiversity

7.441 In conclusion, Officers welcome the landscaping, ecological and biodiversity enhancements proposed for the site. The overarching strategy seeks to provide a variety of green open spaces, each with its own character, to provide opportunities for different activities to be enjoyed. The landscape and public realm would reinforce the core urban design principles of the wider masterplan and strengthen the permeability and legibility of the site with its wider surroundings and connection to the dockside. The masterplan incorporates a clear and distinct route hierarchy, maximises opportunities for natural surveillance and incorporates external spaces which are attractive and accessible.

7.442 The scheme has been reviewed by the Council's Place Shaping Team and whilst they have expressed concerns that the public open space provision is not proportionate to the intensification of residential use (although as detailed above, the quantum would be policy-compliant), they note the high-quality public realm and spaces proposed across the site with the ambitions of the proposals being to, amongst other things: activate the dock edge and adjacent spaces; create opportunities for play and leisure; provide amenity space for a range of ages and activities; create a landscape that supports health and well-being; increase biodiversity and ecological habitats; create links to the existing community to the north and introduce community food-growing opportunities. Full details of the landscaping proposals including details of materials, details of all biodiversity and ecological enhancements, details of UGF and details of trees and planting will be secured via conditions should planning permission be granted.

7.443 Overall, the proposal is considered to be acceptable and broadly delivers Local Plan and national planning policy objectives with regard to matters concerning landscaping, public realm and public open space, ecology and biodiversity.

BUILT HERITAGE

7.444 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a general duty on decision-makers, when considering whether to grant planning permission for development which would affect a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72(1) of the Act places a similar duty and requires that in the exercise of planning functions, with respect to any buildings or other land in a Conservation Area, to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

7.445 The NPPF recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 205 of the NPPF emphasises that great weight should be given to the conservation of designated heritage assets (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 207 of the NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of a series of stated criteria apply. Paragraph 208 of the NPPF states that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

7.446 Policy HC1 of the London Plan requires, amongst other things, development proposals affecting heritage assets and their settings to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC2 of the London Plan requires, amongst other things, that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value (OUV), including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should

not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes.

7.447 At the local level, Policy S.DH3 of the Local Plan requires proposals to preserve or, where appropriate, enhance the Borough's designated and non-designated heritage assets in a manner appropriate to their significance as key and distinctive elements of the Borough's 24 places. Proposals to alter, extend or change the use of a heritage asset or proposals that would affect the setting of a heritage asset will only be permitted where, amongst other things, they safeguard the significance of the heritage asset, including its setting, character, fabric or identity and they enhance or better reveal the significance of assets or their settings.

7.448 As highlighted earlier in this report, the application boundary does not contain any listed buildings and nor does the site fall within a Conservation Area. The submitted BHTVIA has undertaken an assessment of the effects of the proposed development on the significance of a number of built heritage receptors including designated and non-designated heritage assets.

Conservation Areas

7.449 There are 4 Conservation Areas and one Registered Park and Garden (RPG) within the scope of the BHTVIA. They are: Chapel House Conservation Area, Island Gardens Conservation Area, West Greenwich Conservation Area, Greenwich Park Conservation Area and Island Gardens (Grade II RPG).

7.450 In terms of the Conservation Areas, whilst both the West Greenwich and Greenwich Park Conservation Areas are heritage receptors of high value and very high value respectively, they have both been identified in the ES as having a Very Low magnitude of impact and as such the likely effect is reported in the ES as being Negligible Neutral (Not Significant) and would remain as Negligible Neutral in the cumulative scenario.

7.451 In terms of the remaining Conservation Areas these are discussed in more detail below due to their proximity to the application site.

Chapel House Conservation Area

7.452 The Chapel House Conservation Area is located approximately 400m south-east of the site at its nearest point. The Conservation Area comprises early 20th century residential properties grouped on curved roads advocated by Ebenezer Howard. The front gardens and street trees contribute to the overall vision of a 'Garden City' thus the receptor is identified to have high value.

7.453 Views 27 (Chapel House St Junction with Thermopylae) and 28 (Macquarie Way) of the BHTVIA have been identified as having maximum visibility of the scheme from this conservation area as they are axial roads orientated towards the site. These views demonstrate that in the summer months views of the scheme would be entirely screened by the dense tree canopy lining the street. In the winter months, the deciduous tree canopy will shed its leaves and there would be partial views of the scheme. In these views, the scheme would be seen within the context of existing tall and larger development to the north. View 27 is shown in the image below with the proposed scheme in blue wireline.

Figure 58: BHTVIA View 27 (Chapel House St junction with Thermopylae) cumulative view

7.454 The tall buildings introduced by the scheme would appear closer in views across the Conservation Area in the winter months and would be noticeable in contrast to the lower-scale residential development. The assessment reports that this could introduce a distracting element from the appreciation of the Conservation Area, but any distraction is limited to a few locations and the overall historic interest and architectural composition of the residential development would be unaffected. The quality of the architecture and existing context of taller development to the north on the Isle of Dogs means that the scheme would not be unattractive or alien to the experience of the receptor.

7.455 Overall, the ES concludes that the magnitude of impact on the heritage value of the receptor is Very Low and the likely effect is considered to be Negligible Adverse (Not Significant). In the summer months, the magnitude of impact would be reduced by the leaf cover on the trees and as such the likely significance of effect would change to None (Not Significant).

7.456 The cumulative schemes would introduce further tall buildings in the Canary Wharf cluster which may be visible from limited locations within the Chapel House Conservation Area. This would not change the visibility of the scheme. The magnitude of impact would remain Very Low and the likely effect would remain Negligible Adverse (Not Significant).

Island Gardens Conservation Area and Grade II RPG

7.457 The Island Gardens Conservation Area is located approximately 1.2km south-east of the site and the ES has identified this receptor to have a high heritage value. The Conservation Area includes public housing from the late 20th century and the Island Gardens Registered Park and Garden. The significant views of the Conservation Area are those directed south from Island Gardens across the Thames towards the Royal Naval College in Greenwich.

7.458 The BHTVIA reports that the scheme would be visible from the Conservation Area and the RPG. The gardens are, however, heavily enclosed by mature trees which would obscure views of the scheme in the summer months and provide screening in winter.

7.459 Where visible from the Conservation Area, the scheme would be seen over a significant distance. It would be seen to the north of the receptor and not within the riparian view south that mainly contributes towards its heritage value.

7.460 In the views looking at the Conservation Area from the Royal Naval College (View 7), the scheme would be seen in the context of the existing tall buildings in the Isle of Dogs. It would form part of this layer of modern development seen in the backdrop of the Conservation Area and not change how the open space is appreciated or understood from the opposite riverside.

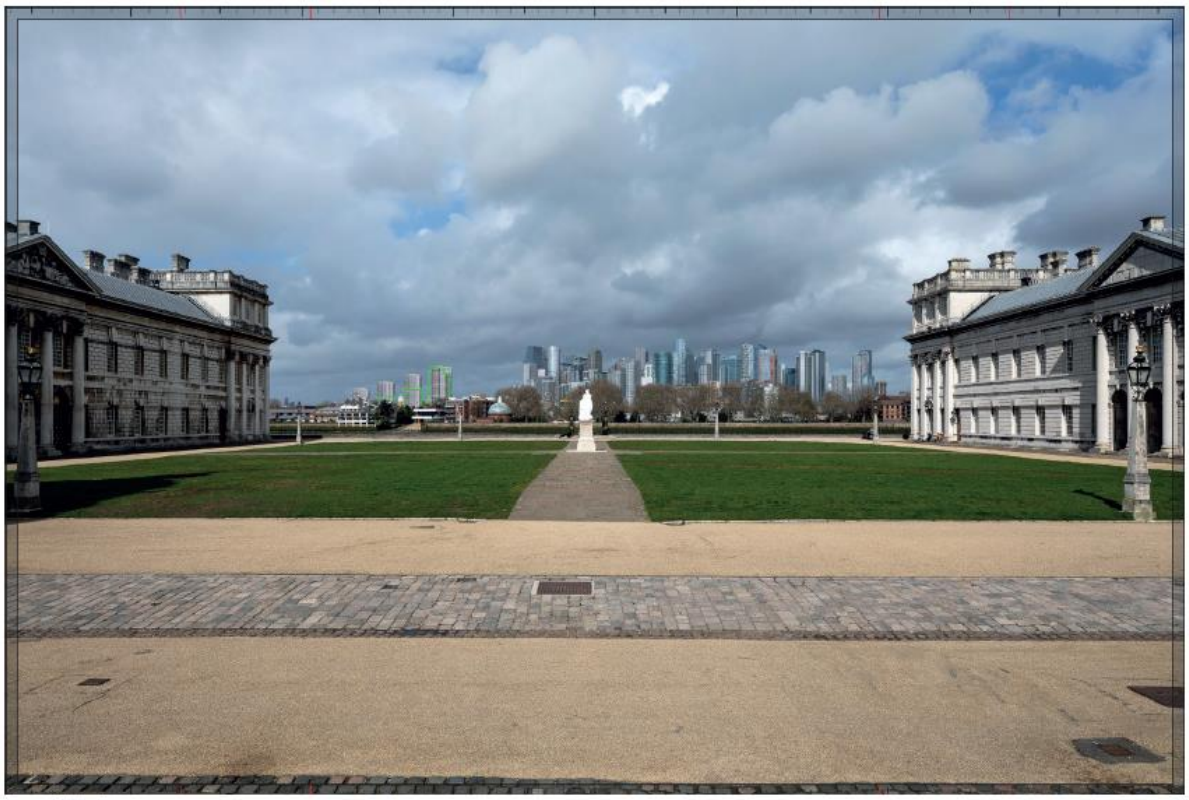


Figure 59: BHTVIA View 7 x 24 (Royal Naval College) cumulative View and consented scheme (green wire line)

7.461 Overall, the ES reports that the scheme would have a Nil magnitude of impact on the historical and architectural interests of the Conservation Area, and this would give rise to a likely effect of None (Not Significant).

7.462 In terms of the Island Gardens Grade II RPG, the assessment of the effect on the Island Gardens Conservation Area can be translated to the RPG. The scheme would be appreciated as part of the layer of modern tall development to the north of the Isle of Dogs and the ability to read and understand the gardens from the Royal Naval College, and the character of the gardens themselves, would not be changed by the scheme which is approximately 1.2km in the backdrop and observers would be aware of the scheme as a distant feature.

7.463 Therefore, the magnitude of impact on the RPG would be Nil and the likely effect would be None (Not Significant).

7.464 In the cumulative scenario, the Canary Wharf cluster would be further consolidated and would be seen together with the Island Gardens Conservation Area and the Island Gardens RPG from the south in Greenwich. The layer of modern development in the backdrop would not change the setting or the impact of the scheme on these receptors. The magnitude of impact would remain at Nil and the likely effects would remain as None (Not Significant).

Listed Buildings

7.465 In terms of listed buildings, the ES has considered listed buildings either individually or in groups based on a study area of 1.5km radius from the site. The full list of listed buildings considered, including those scoped out, is summarised in Tables 5.1 and 5.2 of Chapter 5.0 of the BHTVIA. The likely effects on all receptors are summarised in Tables 9.1 and 9.2 of the BHTVIA and range between None, Negligible Neutral, Negligible Adverse, Minor Neutral and Minor Beneficial. All would be Not Significant during the operational phase of the

development. Similarly in the cumulative scenario, the likely effect will also range between None, Negligible Neutral, Negligible Adverse and Minor Beneficial and all Not Significant.

7.466 A more detailed assessment has been undertaken of the following receptors due to their highly graded status, their close proximity to the site or the visibility of the scheme in relation to these receptors.

Blackwall Basin (Grade I)

7.467 The Blackwall Basin is located approximately 1.3km north-east of the site in the Isle of Dogs and is identified in the BHTVIA as a receptor of very high value. Its value is mainly historical, and it is already experienced in the context of modern development, including tall buildings. The impact of the scheme would be a glimpsed view, if any, of the taller parts of the edges of the Basin. It would be seen in the context of other and nearer tall buildings in these views, and part of the wider townscape in the Isle of Dogs. The assessment concludes that the magnitude of impact would be Nil and the likely effect would be None (Not Significant).

Groups 1: Royal Naval College (Grade I)

7.468 The Royal Naval College is comprised of 6 Grade I listed buildings which are identified as being receptors of very high value. The scheme would appear together with the towers of the Royal Naval College southwest building, King William's Quarter and Royal Naval College, Queen Mary's Quarter and in views from Greenwich Park. It would also be visible as part of the skyline of the Isle of Dogs in views looking north from the courtyard and the setting of the other listing buildings in the Royal Naval College complex.

7.469 The listed buildings have a strong group value together, and as part of the historic area recognised by the World Heritage Site designation. The assessment reports that their historical and architectural interest is such that change to the wider setting, as would be introduced by the scheme, would not be able to have a direct or any considerable effect on heritage value.

7.470 The assessment has been informed by Views 41-46 (Greenwich Park GV1-GV6) of the BHTVIA which shows how the scheme would appear together with the towers of King William's Quarter and Queen Mary's Quarter.

7.471 The scheme would be seen between the two towers and introduce a new skyline feature. This would cause some detrimental impact on the appreciation of the buildings from Greenwich Park, and their character as the most prominent skyline feature.

7.472 The assessment reports that the views from Greenwich Park are kinetic (moving), and there is no set threshold to inform the overall height. It is a relative judgement that changes as the observer moves up and down Greenwich Park. The views generally demonstrate that the scheme would be markedly subservient to the domes of the Royal Naval College in most views, with the exception being View 41(Greenwich Park GV1) which is experienced over a short duration on the eastern boundary of the park. View 41 is shown below with the proposed scheme indicated in blue wireline, the consented scheme indicated in green wireline and cumulative schemes indicated in black wireline.

Figure 60: BHTVIA View 41 – Greenwich Park GV1 proposed, consented and cumulative view

7.473 Where visible, the scheme would be seen within the context of the taller development within the Isle of Dogs. The stepped form of the proposed towers, their proportions and their spacing would combine to create an attractive composition. The relatively low height of E1 ensures that there is a visual break achieved from the ascending heights of T1 to T4 which assists in breaking down the perceived mass.

7.474 The BHTVIA concludes that the magnitude of impact on the Royal Navel College is considered to be Very Low and the likely effect would be Negligible Adverse (Not Significant).

Royal Naval College Pepys Building (Grade II)

7.475 The Royal Navel College Pepys Building forms part of the Royal Naval College buildings assessed above. However, it has a Grade II status and therefore has a heritage value of high. The BHTVIA reports that the Pepys Building is located to the west of the Royal Naval College complex and addresses King William Walk. It does not face onto the courtyard and nor is it appreciated in views from Greenwich Park.

7.476 The scheme would introduce new tall buildings in a part of its distant setting which already has development of this type. Therefore, the magnitude of impact on its heritage value would be Nil and the likely effect None (Not Significant).

National Maritime Museum and Queen's House (Grade I)

7.477 The National Maritime Museum is described in the BHTVIA as a heritage receptor of very high value. It includes the Queen's House, a Scheduled Monument. The scheme is located approximately 2km north-west of the listed building/Scheduled Monument, and the assessment reports that the only potential impact arises from the way the scheme would appear in the backdrop of the heritage receptors in views from the south. The scheme would not change the way the receptors are appreciated in views from the north, nor any of their historical or architectural interest. Any change would therefore be very limited and would take place in part of the distant setting of the buildings which is already characterised by modern development including tall buildings.

7.478 In views associated with this receptor (Views 1, 33 and 41-48), the scheme would appear either side of the Queen's House in views from the south, and there would be locations where

the scheme would be directly behind the Queen's House. These are described in the assessment as being kinetic views of the rear elevation as one moves through the park, and the primary elevation with the main entrance and configuration with the side wings is seen from the north.

7.479 The BHTVIA notes that unlike the Royal Naval College and the domed towers, the roofline of the National Maritime Museum/Queen's House does not have architectural features or detailing that would be challenged by the scheme appearing on the skyline, which is already influenced by tall buildings in the distant background.

7.480 The scheme would appear in a different position relative to the heritage receptor from different points as one moves nearby. The observer would be aware of the distance between the two locations and the contrasting modern context in which the scheme is located. The architecture of the receptors has a horizontal emphasis created by the long colonnaded walkways to each wing and the width of the Queen's House itself commands attention in the views with its striking white façade and Palladian[20] architecture. The Queen's House and National Maritime Museum would remain a focal point and neither their historical nor architectural interest would be removed or undermined.

7.481 The BHTVIA therefore concludes that the magnitude of impact on this receptor would be Nil and the likely effect would be None (Not Significant).

Tower Bridge (Grade I)

7.482 Tower Bridge is a heritage receptor of high value. The scheme would introduce new tall buildings that would be visible together with Tower Bridge in views from the west, and particularly London Bridge where there are strategic views (LVMF 11B). The heritage value of Tower Bridge is focused on its historical and architectural interest, and the immediate riverside setting which includes the Tower of London. The distant setting, whilst appearing in views through the bridge provided by the river corridor, makes a limited contribution to its heritage value. The assessment reports that in this part of its setting, one is already aware of taller developments further east, including the Isle of Dogs and Greenwich.

7.483 In terms of magnitude of impact, the scheme would have no impact on the historical and architectural interest of Tower Bridge or its outer silhouette. Any impact is derived from the way the scheme would appear in the 'inner' silhouette of the bridge i.e. the space between the two towers looking east. The locations where the scheme would be seen in this space mainly concern the long view from London Bridge approximately 840m west of the receptor.

7.484 In the strategic views from London Bridge, the height of the scheme would be equivalent to less than half the height of the girder between the two bridge towers, and the height of the taller buildings would appear to have a consistent datum. As such the extent to which the scheme fills the sky gap seen through Tower Bridge is limited. The visible elements relate more to the existing development located on the Isle of Dogs and are demonstrably subservient to Tower Bridge.

7.485 In View 36 (London Bridge: Downstream North of LVMF 11B1), which is a non-strategic view from slightly north of the centre of London Bridge, Tower Bridge can be seen against a backdrop of clear sky and a distant wooded ridge. In this view, building E1 is obscured. Where visible, in locations slightly south of View 36, the scheme would not materially change the composition of the view due to its relatively low height. The cumulative view of View 36 is indicated below with the proposed scheme rendered and the consented scheme outlined in green wireline.

[20] Architectural style named after Renaissance architect Andrea Palladio

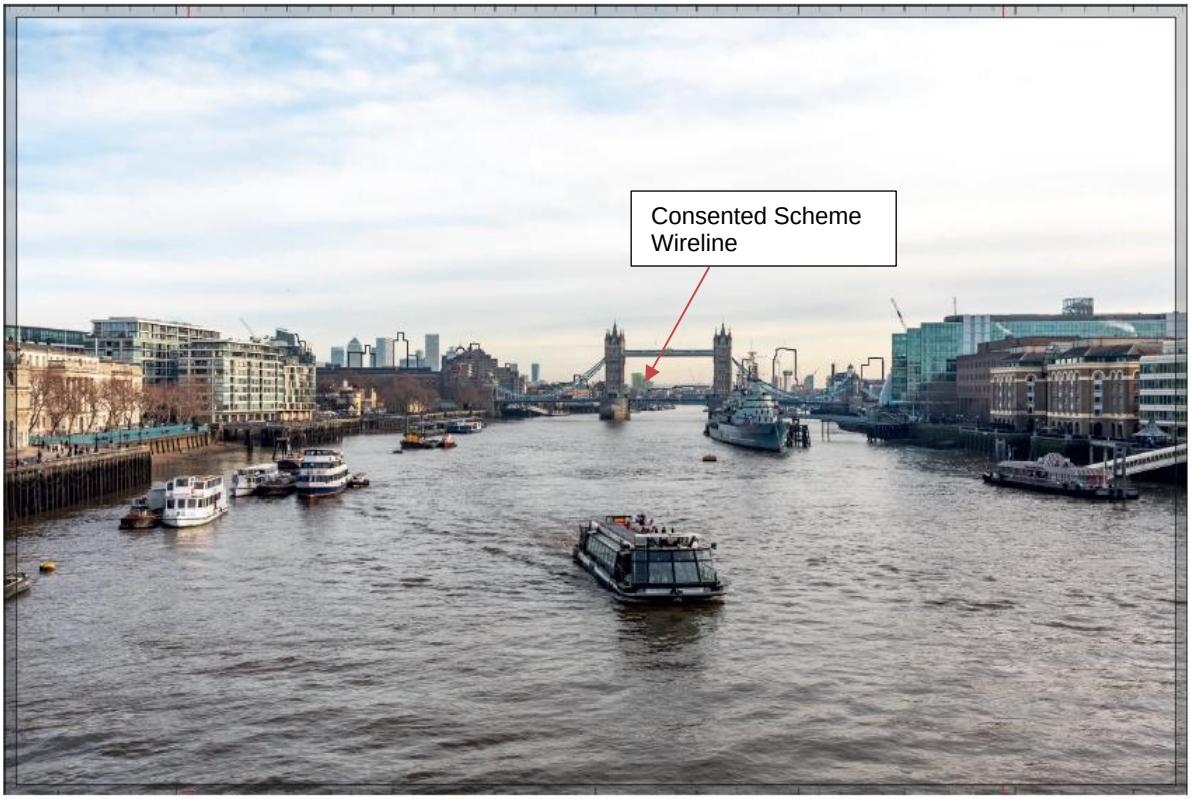


Figure 61: BHTVIA View 36 (London Bridge: Downstream North of LVMF 11B.1) cumulative plus consented view

7.486 The assessment reports that the observer would also be aware of the separating distance between the two objects. Tower Bridge is a prominent and large feature in the foreground, 840m from the viewpoint. In contrast, the site is 4.6km from the viewpoint.

7.487 Overall, the BHTVIA concludes that the scheme would result in a Very Low magnitude of impact on the heritage value of Tower Bridge and this would result in a Negligible Neutral effect (Not Significant).

Formerly St Paul's Presbyterian Church, now part of Herbert Brown Lenox Limited Industrial Premises:

7.488 The former St Paul's Presbyterian Church is described as a heritage receptor of high value. It is located on the east side of Westferry Road approximately 260m south of the site. The impact of the scheme on this heritage receptor is best experienced in Views 21 (Approach along Westferry Road from south) and 35 (Westferry Road and Claude St).

7.489 The heritage value of the listed building is mainly derived from its historical interest and architecture. The developments in its setting are post-war housing estates which make no contribution to its heritage value. The listed building is best appreciated and experienced from Westferry Road.

7.490 The relevant views for this receptor shows how the scheme would appear in the backdrop of the listed building from Westferry Road. The strength of the building's architecture and the proximity of the building in views from Westferry Road means that it would remain the focal point. The building does not have a heavily articulated roofline that would be challenged by the appearance of buildings in the background.

7.491 The listed building would be seen together with the scheme over a short duration moving south to north and the strong architectural language of the listed building means that it would retain prominence in the streetscene and would not be challenged by the four tall buildings in the backdrop. The scheme would be understood as a layer of modern development associated with Canary Wharf to the north. The stepping of the blocks and the generous sky gaps help to reduce the visual impact with the taller blocks not appearing directly behind the church.

7.492 Overall, the BHTVIA concludes that the magnitude of impact would be Low on the heritage value of the church and the likely effect would be Minor Neutral (Not Significant).

World Heritage Sites and Strategic Views

7.493 Policy HC3 of the London Plan confirms the Mayor of London's list of designated Strategic Views that will be kept under review. These views are categorized as follows: London Panoramas, River Prospects and Townscape Views. The policy requires that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Policy HC4 of the London Plan states that development proposals should not harm, and should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements. The London View Management Framework (LVMF) SPD provides further guidance on the management of views designated in the London Plan.

7.494 At the local level, Policy S.DH5 of the Local Plan requires developments to ensure that they safeguard and do not have a detrimental impact upon the OUV (Outstanding Universal Value) of the UNESCO World Heritage Sites (WHS) of the Tower of London and Maritime Greenwich, including their settings and buffer zones. Proposals affecting the wider setting of the Tower of London and Maritime Greenwich, or those impinging upon strategic or other significant views to or from these sites, will be required to demonstrate how they will conserve and enhance the outstanding universal value of the World Heritage Sites. Policy D.DH4 requires development to demonstrate, amongst other things, how it complies with the requirements of the London View Management Framework (LVMF) and World Heritage Site Management Plans (Tower of London and Maritime Greenwich).

Maritime Greenwich World Heritage Site

7.495 The Tower of London WHS has been scoped out of the Environmental Statement as the scheme was deemed in the assessment as having no potential impact on the setting and OUV of the WHS. In terms of the Maritime Greenwich World Heritage Site, this heritage receptor is located approximately 1.5km south-east of the site at the nearest points. The proposed scheme would be visible across the designation with the main areas of visibility being from Greenwich Park, where the rising topography provides panoramic views to the north, the area around the Royal Navel College, and the river edges. This designation also includes the strategic view from the General Wolfe Statue at Greenwich Park (LVMF Views 5A.1 and 5A.2).

7.496 The Statement of OUV identifies the Maritime Greenwich WHS as the most outstanding group of Baroque buildings in England, symmetrically arranged alongside the River Thames. The WHS encompasses the following highly graded buildings: Old Royal Naval College (Grade I), The Queen's House (Grade I) and Observatory (Grade I) as well as the Royal Park (Grade I Registered), the buildings which fringe the park and the town centre buildings that form the approach to the formal ensemble. The WHS is also of exceptional architectural interest as a result of the notable buildings and their composition.

7.497 The impact of the on the WHS has been considered in the BHTVIA under the following headings: Greenwich Park (Including the Royal Observatory); Royal Naval College and Riverside.

7.498 In terms of the impact from Greenwich Park, this has mainly been assessed in the context of the Strategic LMVF View 5A.1 London Panorama (Greenwich Park: The General Wolfe Statue) from Greenwich Park. This viewpoint is located approximately 2.15km from the site at its closest distance, looking along the Grand Axis towards the Isle of Dogs. The visual amenity value attached to this Strategic LMVF view is very high. The view would primarily be experienced by a high number of tourists and observers who would be specifically focusing on the view and its characteristic features.

7.499 The proposed scheme comprises a collection of slender towers arranged along the Millwall Outer Dock that ensures clear sight lines and sky space between the buildings. The buildings have been designed as a composition, each complementing the other, and tapering away from the height established at One Canada Square. The overall effect is a more symmetrical backdrop to the Grand Axis.

7.500 The taller element has a tonality in its cladding that enables blending with the sky dome, an aspect which is successfully deployed in some of the developments in the Canary Wharf cluster. The east to west tapering silhouette of the proposals, the slenderness of their form, the skyline gaps between them, all result in development which will not draw the eye away from the strong centrepiece of the Queen's House in the middle foreground, flanked by the ranges of the Royal Naval College, which is distinct from the varied skyline on the Greenwich Peninsula. The symmetry of the Grand Axis would not be disrupted. As a result, insofar as this symmetry contributes towards the OUV of the WHS, it would not be harmed.

Figure 62: BHTVIA View 1 (LVMF View 5A.1) – Greenwich Park: The General Wolfe Statue cumulative view

7.501 The proposed scheme would have the effect of consolidating the clusters of tall buildings on the Isle of Dogs without undermining the symmetry of the view from the Royal Observatory towards the Queen's House. The viewer's ability to appreciate an architectural composition will be maintained in line with the requirements of the LVMF.

7.502 The assessment reports that in this view the magnitude of impact would be Medium and the scheme would give rise to a likely Moderate Beneficial (Significant) effect in both the operational and cumulative scenarios.

7.503 In terms of the impact of the proposed scheme on the Royal Naval College in the context of the WHS, the BHTVIA notes that the Royal Naval College is one of the primary buildings in the WHS. As detailed earlier in this report under the assessment of the Royal Naval College as a listed building, the views generally demonstrate that the scheme would be markedly subservient to the domes of the Royal Naval College in most views, with the exception being View 41 (Greenwich Park GV1) which is experienced over a short duration on the eastern boundary of the park. Where visible, the scheme would be seen within the context of the taller development within the Isle of Dogs and the stepped form of the towers, their proportions and spacing would combine to create an attractive composition. From the courtyard of the Royal Naval College, the scheme would be seen in the context of existing taller development on the Isle of Dogs. The height of the scheme has been designed to be as subservient as possible to the existing cluster to the east on the Isle of Dogs and would help balance the overall skyline composition.

7.504 The BHTVIA reports that there would be visibility of the scheme from the riverside and that there are listed buildings in this location, including the Cutty Sark. As per the views from the

courtyard of the Royal Naval College, the scheme would be seen in the context of existing taller development on the Isle of Dogs and appear subservient to the cluster of tall buildings to the east of the Isle of Dogs thus there would be no impact on the OUV of the WHS or the heritage value of listing buildings in this part of Greenwich from the scheme.

7.505 Overall, the BHTVIA considers that the scheme would be visible from across the WHS in views looking north, including the Strategic LVMF View 5A.1. The assessment finds that the scheme complies with the LVMF guidance for the strategic view and that there would be no effect on the listed buildings in Greenwich Park near to the viewpoint, their setting being well-defined by the WHS and including tall development in the Isle of Dogs.

7.506 The assessment reports that the scheme would contribute positively to the Isle of Dogs skyline which is appreciated and an accepted part of the setting of the WHS. There would be an impact, however, on the way the towers of the Royal Naval College are appreciated in views from Greenwich Park, with the scheme appearing in the backdrop of this building's skyline silhouette. The Royal Naval College is an important component of the WHS, and any impact on it would result in an impact on the WHS too.

7.507 The assessment reports that the magnitude of impact on the Royal Naval College as an individual receptor (detailed earlier in this report) does not directly translate to the WHS, as this is a much larger receptor and has other aspects of value (The Attributes of OUV). Given that the Royal Naval College is the only aspect of the OUV which is affected, the BHTVIA concludes that the magnitude of impact on the WHS would be Very Low and the likely effect on the Maritime Greenwich WHS to be Negligible Adverse (Not Significant).

Strategic Views

7.508 In addition to LVMF View 5A.1 detailed above and assessed as part of the Maritime Greenwich WHS, the BHTVIA as also considered the following LVMF Strategic Views: LVMF 6A.1 (Blackheath Point), LVMF View 11B.1 (London Bridge: The Downstream Pavement), LVMF View 11B.2 (London Bridge: The Downstream Pavement), LVMF View 1A.2 (Alexandra Palace), LVMF View 2A.1 (Parliament Hill), LVMF View 4A.1 (Primrose Hill) and LVMF 5A.2 (Greenwich Park – North East of General Wolfe Statue).

7.509 Whilst not forming part of the LVMF Views, the assessment has also identified Views 29 (London Bridge: Downstream North of LVMF 11.B), and 36 (London Bridge: Downstream North of LVMF 11.B1) as being views associated with LVMF View 11B.1. Furthermore, the following two Royal Borough of Greenwich designated views have been considered: Shooters Hill to Central London (BHTVIA View 37) and Thames-side Panorama from the Thames Barrier open space (BHTVIA View 38).

7.510 The LVMF views, Views 29 and 36 and the Royal Borough of Greenwich designated views have all been assessed as 'Static Views' within the BHTVIA. During the construction phase of the development, in the mid to long-range static views, the construction activities would be more apparent as part of the wider townscape in the views. Whilst the appearance of such activities would detract from the visual amenity, the visual impact of these works would be limited geographically and temporary in nature. Whilst construction equipment such as cranes would be visible, this would not alter the composition or focus of the views. Therefore, the magnitude of impact on these static views during the construction phase would be Very Low with the likely significance of effect being Negligible to Minor Adverse (Not Significant).

7.511 In the operational phase, the scheme would mostly be seen from LVMF Views 5A.1, 5A.2, 6A.1 and BHTVIA Views 29 and 36. In the remaining views the proposed scheme would be either at a considerable distance or generally concealed by interposing developments both existing and consented. The BHTVIA identifies that the magnitude of impact would range between Nil, Very Low, Low and Medium and the likely effect would range from None, Negligible Neutral, Negligible Beneficial and Moderate Beneficial. For all the static views the significance of effect is assessed to be Not Significant with the exception of LVMF View 5A.1 which has a Significant effect as detailed above.

Archaeology

7.512 Policy S.DH3 of the Local Plan requires developments that lies in or adjacent to an archaeological priority area to include an aracheological evaluation report and will require any nationally important remains to be preserved permanently in situ.

7.513 The site is situated in the Isle of Dogs Tier 3 Archaeological Priority Area (APA) due to its extensive area containing paleoenvironmental evidence of past wetland and riverine environments and the potential for prehistoric remains. It was also an extensive area of historic industry and trade in the 19th and 20th centuries.

7.514 The Application has been accompanied by an Archaeological Desk Based Assessment prepared by MOLA. The assessment identifies that the site has a high potential for well-preserved paleoenvironmental remains, a moderate potential to contain prehistoric remains, a low potential to contain Roman and early medieval remains, and a moderate localised potential to contain later medieval remains and localised and fragmented post-medieval remains.

7.515 The main area of survival is the western third of the site and along the northern and eastern edges of the site outside of the footprint of the excavated basement (excavated as part of the consented planning permission). The proposed development would include excavation of two further basements, located on the south-western and north-eastern parts of the site, followed by the construction of the high-rise buildings across the site, the secondary school and the associated landscaping.

7.516 The archaeological assessment reports that excavation for the basement is likely to only affect post-medieval remains however piled foundations would have an impact, removing within their footprints any remains that might survive basement excavation. Other impacts such as ground remediation, landscaping and planting would have lesser impact and mostly only on late 19th century and later remains.

7.517 As per the extant planning permission, the impact of the proposal on any archaeological remains can be managed through the imposition of suitable condition securing, amongst other things, a Written Scheme of Investigation and further site investigation and recording as recommended by the Greater London Archaeology Advisory Service.

Conclusions on Built Heritage

7.518 Officers have considered the submitted Built Heritage Townscape Visual Impact Assessment (BHTVIA) and the standalone archaeological desk-based assessment and the conclusions drawn and agree with the significance of effects identified in the findings of the BHTVIA.

7.519 The Environmental Statement has considered the Maritime Greenwich World Heritage Site, 4 Conservation Areas, a Grade I Registered Park and Garden and individual and groups of listed buildings contained within a 1.5km radius from the site. The magnitude of impact during the construction phase of the development on these heritage receptors ranges between Nil, Very Low and Low and the significance of effect ranges between None, Negligible Adverse and Minor Neutral (Not Significant). In the operational phase of the development the magnitude of impact ranges between Nil, Very Low and Low and the significance of effect ranges between None, Negligible Neutral, Negligible Adverse, and Minor Beneficial (Not Significant). In the cumulative scenario the magnitude of impact ranges between Nil, Very Low and Low and the significance of effect ranges between None, Negligible Neutral, Negligible Adverse and Minor Beneficial (Not Significant).

7.520 In terms of the strategic views, with the exception of LVMF 5A.1 (Greenwich Park) which has a Significant likely effect, all the other strategic views are identified as having likely effects that are Not Significant.

7.521 The assessment does, however, identify harm to the Grade I listed Royal Naval College and by association to the Maritime Greenwich World Heritage Site. Harm is also identified to the Chapel House Conservation Area. The harm to these heritage receptors is considered to be less than substantial and on the lower end of the spectrum. Officers note that the Greater

London Authority (GLA) Officers in their detailed Stage I report have identified that the scheme would give rise to less than substantial harm to the following receptors: Maritime Greenwich World Heritage Site (Low to middle), Tower Bridge Grade I listed (Low), Former St Paul's Presbyterian Church Grade II listed (Low to middle), Millwall Wharf warehouse group Grade II listed (Low) and the Chapel House Conservation Area (Very Low).

7.522 Officers have reviewed the BHTVIA with LBTH Place Shaping Officers and consider that in Views 41-50 of the BHTVIA the proposal would be visible above and within the sky space of the Royal Naval College. This would, as expected, cause additional harm beyond the extant planning permission; however, in these views, the scheme is an improvement from the Appeal Scheme, particularly in the reduction in height of towers T4 and T5 (now replaced with E1). Officers agree that the harm to the Royal Naval College and by association to the Maritime Greenwich World Heritage Site would be less than substantial. Officers also agree with GLA Officers that there would be less than substantial harm to both Tower Bridge and the Former St Paul's Presbyterian Church.

7.523 Chapter 16 of the National Planning Policy Framework (NPPF) is concerned with conserving and enhancing the historic environment. Paragraph 205 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

7.524 Paragraph 208 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.525 As detailed above, Officers have identified that the proposed development will result in less than substantial harm to heritage assets. This harm would therefore need to be weighed against the public benefits of the proposals. These are detailed as follows:

- The regeneration and redevelopment of an underutilised site.
- The provision of 1358 new homes.
- The provision of 379 affordable new homes.
- The provision of new employment opportunities, during both the construction phase and operational phase of the development.
- The provision of community benefits including a community centre and crèche.
- The provision of new public open space and high-quality public realm and landscaping.
- The improved pedestrian access and connectivity to the wider locality.
- The provision of a new dockside promenade.

7.526 It is considered that any less than substantial harm identified to the setting of heritage assets as detailed earlier in this report is significantly outweighed by the public benefits of the proposal as outlined above. The degree of harm to heritage assets are considered to be on the lower end of the scale. Historic England have been consulted on this planning application and have confirmed that they do not wish to raise any significant concerns with regards to the proposed scheme. Historic England have also advised that they consider the proposed scheme to be an improvement on the Appeal Scheme and broadly similar in terms of impact on the historic environment to the consented scheme.

7.527 In reaching this conclusion, Officers have paid special attention to the desirability of preserving features of special architectural or historic interest, and in particular listed buildings in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Officers have also paid special attention to the desirability of preserving or enhancing

the character or appearance of the Conservation Areas identified above in accordance with section 72 of the Planning (Listed Building and Conservation Areas) Act 1990. For these reasons Officers consider the impact on heritage assets to be acceptable.

AMENITY

7.528 Paragraph 135 of the NPPF states that planning decisions should ensure that developments create places that are safe, inclusive, accessible and which promote health and well-being, with a high standard of amenity for existing and future users,…'. Paragraph 191 of the NPPF states that development proposals should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid significant adverse noise impacts on health and quality of life.

7.529 Policy D3 of the London Plan requires development proposals to, amongst other things, deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality. Policy D14 of the London Plan requires development proposals to, amongst other things, avoid significant adverse noise impacts on health and quality of life.

7.530 At the local level, 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, and 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 and 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.

Privacy, Outlook and Separation Distances

7.531 Policy D.DH8 of the Local Plan sets a guide of a distance of 18 metres between 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.

7.532 Blocks N1 and N2 are sited closest to neighbouring residential properties to the site, namely residential properties to the north comprising 1-20 Starboard Way and 7-16 Omega Close. Starboard Way comprises a 4-storey flatted building with approximately 10 metre deep ground level gardens abutting the northern boundary of the site. Omega Close comprises a terrace of 3-storey dwellings which have rear gardens measuring between approximately 7m – 17m deep. Blocks N1 and N2 within the masterplan are located approximately between 8-9m set back from the northern boundary of the site. Overall separation distances between the north-eastern elevation of block N1 and the rear (southern) elevations of 7-16 Omega Close will be some 25 metres. The separation distance between the closest northern elevation of block N2 and the rear (southern) elevations of 1-20 Starboard Way will be approximately 20 metres.

7.533 In terms of block N3, this block is sited closest to dwellings in Claire Place with the closest property being 32 Claire Place. However, there would be a separation distance of some 43m between the northern elevation of block N3 and the rear (southern) elevation of 32 Claire Place.

7.534 In terms of the school building, the northern wing of the school would be sited within close proximity of numbers 16-19 Claire Place. However, there would be separation distance of some 23-24m between the eastern elevation of the main school building and the western rear elevations of numbers 16-19 Claire Place.

7.535 The main school building is also located within close proximity of residential properties at Caravel Close to the west. However, the northern wing of the main school building would be set back some 28 metres from the eastern boundary of 1 Caravel Close. The sports block will be a single storey building with no windows on the northern elevation thus will not overlook any neighbouring residential properties.

7.536 The relationship that the northern buildings and the school building would have with the neighbouring properties as described above can be seen in the image below.

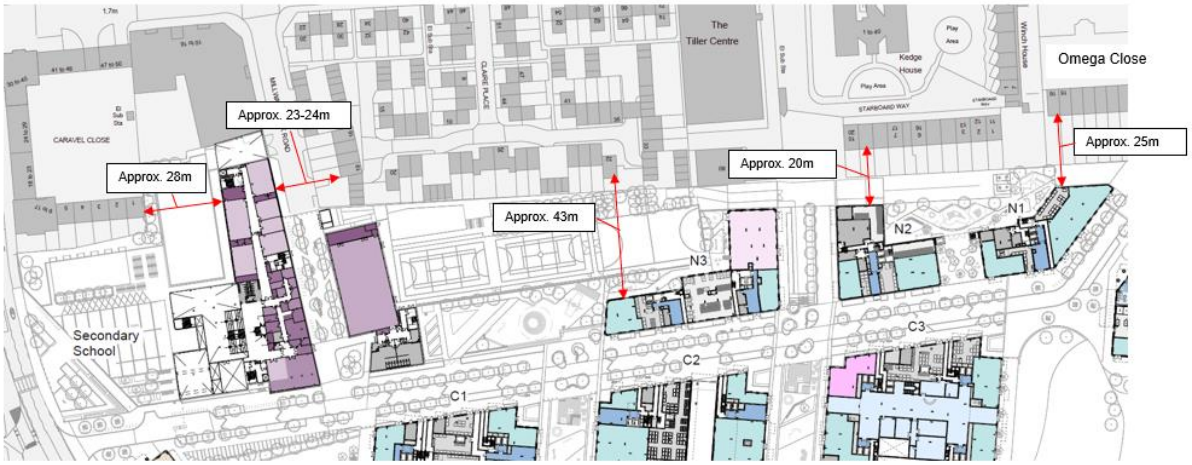


Figure 63: Relationship between northern blocks N1-N3 and school with neighbouring residential developments

7.537 Other nearby residential developments are sited at much greater distances away from the development than the neighbouring residential properties identified above and therefore are not considered to be impacted upon in terms of any material loss of privacy, overlooking, outlook and sense of enclosure to residential occupiers as a result of the proposed development.

7.538 In summary, it is considered that the proposed development has been designed to have regard to neighbouring residential buildings and the amenities enjoyed by neighbouring residential occupiers. Sufficient separation distances would be maintained between the proposed development and the nearest neighbouring buildings to ensure that the development does not result in any material loss of privacy, overlooking and outlook detrimental to the living standards and amenities enjoyed by neighbouring residential occupiers.

Daylight, Sunlight & Overshadowing

7.539 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2022).

7.540 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 receive.

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)/Daylight Distribution (DD) assessment which measures the distribution of daylight at the 'working plane' within a room where internal room layouts are known or can be reasonably assumed.

7.541 In respect of VSC, daylight may be adversely affected if, after a development, the VSC measured at the centre of an existing main window is both less than 27%, and less than 0.8 times its former value. The assessment is calculated from the centre of a window on the outward face and measures the amount of light available on a vertical wall or window following the introduction of visible barriers, such as buildings.

7.542 In terms of the NSL calculation, daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less

than 0.8 times its former value. The working plane is a horizontal plane 0.85m above the Finished Floor Level for residential properties.

7.543 Annual Probable Sun Hours represents the sunlight that a given window or room may expect over a typical yearly period. To calculate the loss of sunlight over the year, the annual probable sunlight hours (APSH) is used. 'Probable Sunlight Hours' means the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question. The sunlight reaching a window is quantified as a percentage of this unobstructed annual total. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter (21st September to 21st March). Where the proposed values fall short of the above, and the absolute loss is greater than 4% (over the whole year) than the proposed values should not be less than 0.8 times their previous values in each period (i.e. reductions should not be greater than 20%). The BRE guidance requires that sunlight tests should be applied to windows of main habitable rooms of neighbouring properties within 90° of due south.

7.544 The submitted Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare Assessment that forms Chapter 12 of the Environmental Statement (ES) identifies significance criteria against the assessment results. The significance criteria have been used to determine the nature and scale of effect to the identified receptors in the application of VSC where VSC is reduced to less than 27%; where NSL is reduced to less than 0.8 times its former value and where where APSH is reduced to less than 25% and/or less than 5% in the winter months.

7.545 The assessment identifies that 'Moderate' or 'Major' effects are deemed to be 'Significant' and 'Minor' or 'Negligible' effects are considered to be 'Not Significant'.

7.546 The criteria that have been applied to assess the magnitude of impact of change in daylight are set out in the table below:[21]

Magnitude of Effect	VSC	No-Sky Line
Negligible	Proposed VSC ≥27% - or Proposed VSC <27% and 0.8 times former value.	Proposed lit area is ≥0.8 times former value
Minor	Proposed VSC <27% and between 0.79 – 0.70 times former value. (i.e. 21% to 30% reduction)	Proposed lit area is between 0.79-0.70 times former value. (i.e. 21% to 30% reduction).
Moderate	Proposed VSC <27% and between 0.69-0.6 times former value. (i.e. 31% to 40% reduction.	Proposed lit area is between 0.6-0.69 times former value. (i.e. 31% to 40% reduction)
Major	Proposed VSC <27% and <0.6 times former value. (i.e. more than 40% reduction).	Proposed lit area is <0.6 times former value. (i.e. more than 40% reduction).

Table 8: Daylight criteria to assess magnitude of effect

7.547 The criteria that have been applied to assess the magnitude of impact for change in sunlight are set out in the table below:

[21] ≥ (greater than or equal too), < (less than).

Magnitude	APSH Test	APSH in Winter Test
Negligible	Proposed APSH ≥25% or Proposed APSH <25% and ≥0.8 times former value or < 4% APSH loss over the whole year.	Proposed APSH in winter ≥5% or Proposed APSH <5% and ≥0.8 times former value or <4% APSH loss over the whole year.
Minor	Proposed APSH <25% and between 0.79 – 0.70 times former value. (i.e. 21% to 30% reduction).	Proposed APSH <5% and between 0.79-0.70 times former value. (i.e. 21% to 30% reduction).
Moderate	Proposed APSH <25% and between 0.69-0.60 times former value. (i.e. 31% to 40% reduction).	Proposed APSH <5% and between 0.69-0.60 times former value. (i.e. 31% to 40% reduction).
Major	Proposed APSH <25% and 0.6 times former value. (more than 40% reduction)	Proposed APSH area is 0.6 times former value. (i.e. more than 40% reduction).

Table 9: Sunlight criteria to assess magnitude of effect.

7.548 The daylight and sunlight assessment within the ES identifies 136 surrounding sensitive receptors. A total of 1028 windows serving 662 habitable rooms were assessed for daylight and 681 windows serving 410 rooms were assessed for sunlight.

7.549 The assessment highlights that for existing daylight baseline conditions, 704 (68%) of the 1028 windows assessed for VSC and 643 (97%) of the 662 rooms assessed for NSL meet BRE guidelines criteria for daylight of 27% VSC and 80% NSL. For existing sunlight baseline conditions, 543 (80%) of the 681 windows assessed would meet the BRE guidelines criteria of 25% total APSH and 608 (89%) of the 681 windows would meet BRE guidelines criteria for Winter Probable Sunlight Hours (WPSH).

7.550 The daylight and sunlight receptors are identified in Figure 64 below.

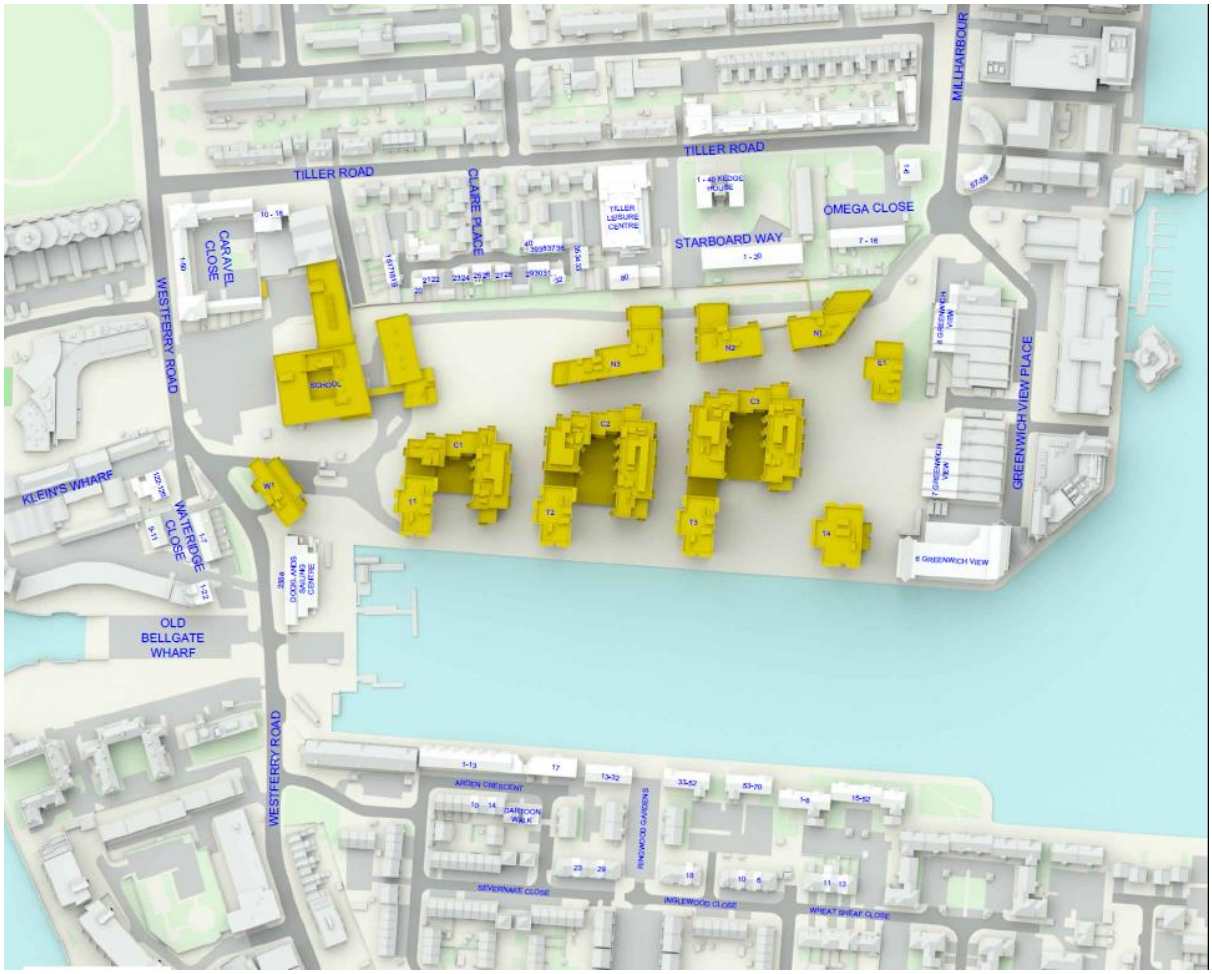


Figure 64: Daylight and Sunlight receptors assessed

Daylight

7.551 The daylight assessment finds that of the 1028 windows assessed for VSC, 742 (72%) would meet BRE criteria by retaining VSC levels of at least 27% or at least 0.8 times their former values. Of the remaining 286 windows, 95 (33%) would achieve a factor of their former values ranging between 0.79 and 0.70, 76 (27%) between 0.69 and 0.60 and 115 (40%) below 0.60.

7.552 In terms of the NSL results, the assessment finds that 554 (84%) of the 662 rooms assessed would meet BRE criteria by retaining at least 0.8 times their former values. Of the remaining 118 rooms, 29 (25%) would achieve a factor of their former values ranging between 0.79 and 0.70, 20 (17%) between 0.69 and 0.60 and 69 (58%) below 0.60.

7.553 Of the 136 buildings assessed the following 70 receptors meet BRE criteria for both VSC and NSL and would experience little to no impact or retain values in line with BRE criteria and would therefore experience Negligible (Not Significant) effect following completion of the development:

- 1-22 Old Bellgate Wharf
- 2 to 50 Caravel Close
- 12, 13, 34, 35 and 39 Claire Place
- 1-40 Kedge House
- 1-6 Omega Close
- 15-52 Wheat Sheaf Close
- 13-32, 33-52 and 53-70 Ringwood Gardens
- 1-13 Arden Crescent
- 11 and 13 Wheet Sheaf Close
- 6,10 and 18 Inglewood Close
- 23 and 29 Severnake Close

- Dartmoor Walk
- 10 and 14 Arden Crescent.

7.554 The following 17 receptors experience a Minor Adverse (Not Significant) reduction in VSC and/or NSL tests.

- 1 Caravel Close
- 11, 21 to 26, 31, 33, 36 to 38 and 40 Claire Place
- 1 to 14 Wheat Sheaf Close
- 161 Mellish Street

7.555 The remaining receptors have all been identified to have Significant effects are considered further below:

1 Wateridge Close and 3 Wateridge Close

7.556 These are 2-storey houses located to the south-west of the site on the western side of Westferry Road. The VSC results show that none of the 6 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 6 windows, 4 (67%) would achieve a factor of their former value ranging between 0.69 and 0.60 and 2 windows would have values below 0.60. The retained level of VSC for these 6 windows would range between 18.91% and 21.29%.

7.557 The NSL results indicate that 1 (25%) of the 4 rooms assessed satisfies the BRE guidelines. One of the remaining 3 (75%) rooms would achieve a factor of their former value ranging between 0.79 and 0.70, the remaining 2 rooms between 0.69 and 0.60 of which both rooms are living rooms.

7.558 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

2 Wateridge Close

7.559 This is a 2-storey house located to the south-west of the site on the western side of Westferry Road. The VSC results show that none of the 4 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Three (75%) of the windows achieve a factor of their former value ranging between 0.69 and 0.60 and the remaining window would have a value less than 0.60 times its former value. The retained level of VSC for these 4 windows would range between 19.9% and 24.93%.

7.560 The NSL results indicate that 1 (33%) of the 3 rooms assessed satisfies the BRE guidelines. Of the remaining rooms, 1 achieves a factor of its former value ranging between 0.79 and 0.70 with the remaining room achieving between 0.69 and 0.60. The ES goes on to report that the living room to this property will be BRE-compliant for NSL and that the windows serving this room will retain VSC levels of 21.37% and 20.65%.

7.561 Overall, the ES assesses the effect to this receptor to be **Moderate Adverse (Significant).**

4 Wateridge Close and 6 Wateridge Close

7.562 These are 2-storey houses located to the south-west of the site on the western side of Westferry Road. The VSC results show that none of the 8 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. All 8 windows would achieve a factor of their former value ranging between 0.69 and 0.60. The retained level of VSC for all these windows would range between 19.24% and 25.10%.

7.563 The NSL results indicate that none of the 6 rooms assessed satisfies the BRE guidelines. Four (67%) of the 6 rooms would achieve a factor of their former value ranging between 0.79 and 0.70 and the remaining 2 rooms (33%) would achieve below 0.69 and 0.60.

7.564 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

5 Wateridge Close and 7 Wateridge Close

7.565 These are 2-storey houses located to the south-west of the site on the western side of Westferry Road. The VSC results show that none of the 6 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. All 6 windows would achieve a factor of their former value ranging between 0.69 and 0.60. The retained level of VSC for these 6 windows would range between 19.53% and 22.39%.

7.566 The NSL results indicate that none of the 4 rooms assessed satisfies BRE guidelines. Two (50%) of the 4 rooms would achieve a factor of their former value ranging between 0.79 and 0.70 and the remaining 2 rooms (50%) between 0.69 and 0.60.

7.567 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

8-11 Wateridge Close

7.568 These are 2-storey houses located to the south-west of the site on the western side of Westferry Road. The VSC results show that all of the 12 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. The retained level of VSC for these windows would range between 23.76% and 25.56%.

7.569 The NSL results indicate that none of the 12 rooms assessed satisfies the BRE guidelines. Five (42%) of the 12 rooms would achieve a factor of their former value ranging between 0.79 and 0.70, 4 (33%) between 0.69 and 0.60 and the remaining 3 (25%) rooms below 0.60. The assessment reports that the 3 rooms that achieve a factor of their former value below 0.60 are on the first floor and are likely to be bedrooms which are less important in the consideration of daylight by BRE guidelines.

7.570 Overall, the ES assesses the effect to these receptors to be **Minor Adverse (Not Significant)**.

14 Claire Place

7.571 This is a 2-storey house located to the north-west of the site. The VSC results show that 15 (88%) of the 17 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. The remaining 2 (12%) windows would achieve a factor of their former values below 0.60. Both these windows serve a conservatory and an LKD. This window has an absolute VSC of 1.74% in the baseline condition which is reduced to 0.47% with the proposed development in place. As the VSC is very low in the baseline condition, the ES reports that the reduction manifests as a disproportionally large reduction. Five conservatory windows retain VSC levels of between 18.94% and 25%.

7.572 The NSL results show that 3 of the 3 rooms assessed satisfies BRE guidelines.

7.573 Overall, the ES assesses the effect to this receptor to be **Minor Adverse (Not Significant)**.

16-19 Claire Place

7.574 These are four 2-storey houses located to the north-west of the site on the eastern side of Millwall Dock Road. The VSC results show that 3 (30%) of the 10 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. The remaining 7 (70%) would achieve a factor of their former value ranging between 0.79 and 0.70. The retained level of VSC for these 10 windows would range between 22.70% and 26.86%.

7.575 The NSL results show that 4 (50%) out of the 8 rooms assessed satisfy BRE guidelines. The remaining 4 rooms would achieve a factor of their former value of below 0.6.

7.576 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

20 and 27 to 30 Claire Place

7.577 These are five 2-storey houses located to the north of the site. The VSC results show that 3 (18%) of the 17 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 14 (82%) remaining windows, 8 would achieve a factor of their former value ranging between 0.79 and 0.70 and 6 would achieve between 0.69 and 0.60. These 6 rooms are bedrooms which are less important in the consideration of daylight by BRE guidelines. The retained level of VSC for these 17 windows would range between 20.53% and 25.05%.

7.578 The NSL results show that 12 of 12 rooms assessed satisfy the BRE guidelines.

7.579 Overall, the ES assesses the effect to these receptors to be **Minor Adverse (Not Significant)**.

32 Claire Place

7.580 This is a 2-storey house located to the north of the site. The VSC results show that 4 (31%) of the 13 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 9 (69%) remaining windows, 4 would achieve a factor of their former value ranging between 0.79 and 0.70, 2 would achieve a factor of their former value ranging between 0.69 and 0.60 and 3 below 0.60. The 5 windows which would achieve a factor of their former value below 0.69 serve bedrooms. The retained level of VSC for these 5 windows would range between 19.61% and 23.08%.

7.581 The NSL results show that 4 (57%) of the 7 rooms assessed satisfies the BRE guidelines. The remaining 3 (43%) rooms achieve a factor of their former value ranging between 0.79 and 0.70.

7.582 Overall, the ES assesses the effect to this receptor to be **Minor Adverse (Not Significant)**.

1 to 10 Starboard Way

7.583 These residential dwellings are located in a 4-storey flatted building located north of the site. The VSC results show that none of the 40 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or 0.8 times their former values. All 40 windows would achieve a factor of their former value below 0.60. The retained level of VSC for these 40 windows would range between 15.14% and 17.5%.

7.584 The NSL results show that none of the 30 rooms assessed satisfies the BRE guidelines. The ES chapter does not provide a detailed analysis of these properties and further clarification was sought by Officers. However, the Applicant's daylight/sunlight consultants have advised that the room uses are unknown as are the layouts. The assessment assumes that the ground floor rooms are living rooms as they lead to the rear gardens. Above ground floor, these rooms may be bedrooms; however, as they are made up of duplexes, it is difficult to know with any degree of certainty.

7.585 Overall, the ES assesses the effect to these receptors to be **Major Adverse (Significant)**.

11 to 14 Starboard Way

7.586 These 4 residential dwellings are located in a 4-storey flatted building directly north of the site. The VSC results show that none of the 16 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. All windows would achieve a factor of their former value below 0.60. The retained level of VSC for these 16 windows would range between 15.25% and 18.31%.

7.587 The NSL results show that none of the 12 rooms assessed satisfies the BRE guidelines. Two would achieve a factor of their former value ranging between 0.79 and 0.70, 2 would achieve a factor of their former value ranging between 0.69 and 0.60, and the remaining 8 would achieve a factor of their former value below 0.60. The ES chapter does not provide a detailed analysis of these properties and, as with the above receptor, clarification was sought by Officers. The Applicant's consultants have advised that the room uses are unknown as are the layouts. These rooms may be bedrooms; however, as they are made up of duplexes, the Applicant's consultants have advised that it is difficult to know with any degree of certainty.

7.588 Overall, the ES assesses the effect to these receptors to be **Major Adverse (Significant)**.

15 and 17-20 Starboard Way

7.589 These 5 residential dwellings are located in a 4-storey flatted building directly north of the site. The VSC results show that none of the 20 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. All windows would achieve a factor of their former value below 0.60. The retained level of VSC for these 20 windows would range between 15.03% and 18.15%.

7.590 The NSL results show that none of the 15 rooms assessed satisfies the BRE guidelines. One (7%) would achieve a factor of their former value ranging between 0.69 and 0.60 and the remaining 14 (93%) would achieve a factor of their former value below 0.60.

7.591 The ES chapter does not provide a detailed analysis of these properties and as such further clarification was sought by Officers. The Applicant's consultants have advised that the room uses are unknown as are the layouts. These rooms may be bedrooms; however, as they are made up of duplexes, the Applicant's consultants have advised that it is difficult to know with any degree of certainty.

7.592 Overall, the ES assesses the effect to these receptors to be **Major Adverse (Significant)**.

16 Starboard Way

7.593 This residential property is located to the north-west of the site. The VSC results show that none of the 4 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. The retained level of VSC for these 4 windows would range between 14.91% and 17.55%.

7.594 The NSL results show that none of the 3 rooms assessed satisfies BRE guidelines. One would achieve a factor of their former value ranging between 0.69 and 0.60 and 2 would achieve a factor of their former value below 0.60.

7.595 The ES chapter does not provide a detailed analysis of these properties and the Applicant's consultants have advised that the room uses are unknown as are the layouts. These rooms may be bedrooms; however, as they are made up of duplexes, it is difficult to know with any degree of certainty.

7.596 Overall, the ES assesses the overall effect to this receptor to be **Major Adverse (Significant)**.

7 to 9 Omega Close

7.597 These are 3-storey houses located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The VSC results show that 1 (5%) of the 21 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. 14 of the remaining 20 windows would achieve a factor of their former value ranging between 0.79 and 0.70, 4 between 0.69 and 0.60 and 2 below 0.6. The 4 second floor windows which achieve a factor of their former value of between 0.69 and 0.60 are assumed bedrooms which are oversailed by the eaves of the roofs above. Due to the eaves above, these second floor windows have a restricted view of the sky. The retained levels of VSC for these four windows will range between 13.73% and 14.19%.

7.598 The 2 second floor windows which achieve a factor of former value of less than 0.60 are assumed to be bedrooms with the roof eaves oversailing. The ES reports that due to the eaves above, these second floor windows have a restricted view of the sky. The retained levels of VSC for these 6 rooms will range between 12.60% and 13.02%.

7.599 The NSL results show that 8 (89%) of the 9 rooms assessed satisfy the BRE guidelines. The remaining room (11%) will achieve a factor of its former value of between 0.79 to 0.70.

7.600 Overall, the ES assesses the overall effect to this receptor to be **Moderate Adverse (Not Significant).**

10 and 11 Omega Close

7.601 These are 3-storey houses located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The VSC results show that none of the 14 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Two (14%) of the 14 windows achieve a factor of their former value ranging between 0.79 and 0.70, 8 (57%) between 0.69 and 0.60 and 4 (29%) below 0.60.

7.602 The retained level of VSC for the 8 windows that would achieve a factor of former value between 0.69 and 0.60 would range between 21.31% and 24.11%. The assessment reports that the remaining 4 windows which achieve a factor of their former value of less than 0.60 are assumed to be 2nd floor bedroom windows which are oversailed by the eaves of the roofs above thus experience a restricted view of the sky.

7.603 The NSL results show that 3 (50%) of the 6 rooms assessed satisfy BRE guidelines. One (17%) of the rooms will achieve a factor of its former value of between 0.7 to 0.79. The remaining 2 rooms (33%) would achieve a factor of their former values ranging between 0.69 and 0.60.

7.604 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Not Significant)**.

12 and 13 Omega Close

7.605 These are 3-storey houses located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The VSC results show that none of the 14 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Ten (71%) of the 14 windows would achieve a factor of their former values ranging between 0.69 and 0.60 and 4 below 0.6. The retained level of VSC for the 10 windows that range between 0.69 and 0.60 factor of their former value would range between 20.63% and 22.81%. The remaining 4 (29%) 2nd floor windows which achieve a factor of their former values of less than 0.60 are assumed to be bedroom windows which are oversailed by the eaves of the roofs above and thus have restricted views of the sky.

7.606 The NSL results show that none of the 6 rooms assessed satisfy the BRE guidelines. Three (50%) of the 6 rooms achieve a factor of their former values ranging between 0.79 and 0.70 and 1 would achieve a factor of their former value between 0.69 and 0.60 and 2 would achieve a factor of their former values of just below 0.60 (0.58 achieved).

7.607 Overall, the ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

14 and 15 Omega Close

7.608 These are 3-storey houses located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The VSC results show that none of the 15 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. One (7%) of the windows would achieve a factor of their former value ranging between 0.79 and 0.70, six (40%) of the 15 windows would achieve a factor of their former value ranging between 0.69 and 0.60 and 8 (53%) would achieve below 0.60.

7.609 The retained level of VSC for 8 of the 14 windows that achieve a factor of their former value less than 0.69 would range between 15.80% and 21.4%. The remaining 6 windows achieve a factor of their former value of less than 0.6. Two of the windows serve a rear single-storey ground floor extension that is served by 2 additional windows that achieve an absolute VSC of 15.80% and 16.91%, and 4 are 2nd floor windows which are assumed to be bedrooms which are oversailed by the eaves of the roofs above thus have restricted views of the sky.

7.610 The NSL results show that none of the 6 rooms assessed satisfy the BRE guidelines. One (17%) of the 6 rooms will achieve a factor of its former value ranging between 0.79 and 0.70. Four (67%) of the remaining 5 rooms achieve a factor of their former value ranging between 0.69 and 0.60 and 1 (17%) would achieve a factor of its former value of below 0.60.

7.611 Overall, the ES assesses the effect to these receptors as being **Moderate Adverse (Significant)**.

16 Omega Close

7.612 This is a 3-storey house located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The VSC results show that none of the 7 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. All of the 7 windows would achieve a factor of their former value below 0.60. The retained level of VSC for 5 (71%) of these 7 windows would range between 17.89% and 20.97%. The assessment reports that the remaining 2 (29%) windows are assumed to be 2nd floor bedroom windows that are oversailed by the eaves of the roof above thus have restricted views of the sky.

7.613 The NSL results show that none of the 3 rooms assessed satisfies the BRE guidelines. All of the 3 rooms would achieve a factor of their former value below 0.60.

7.614 Overall, the ES assesses the effect to this receptor to be **Major Adverse (Significant)**.

61-97 Tiller Road

7.615 These are residential properties contained in a flatted development located to the north of the site on the northern side of Tiller Road. The VSC results show that 128 (69%) of the 186 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 58 (31%) remaining windows 37 would achieve a factor of their former value ranging between 0.79 and 0.70, 19 between 0.69 and 0.60 and 2 below 0.6.

7.616 The assessment reports that 15 of the 19 windows which would achieve a factor of their former value between 0.69 and 0.6 achieve low levels of VSC in the baseline (between 4.6% and 10.71%) as a result of the oversailing of the floor plate above windows and/or side projection adjacent. As the VSC levels are low in the baseline, the reductions manifest as disproportionately large ratio reductions. The remaining 4 windows achieve a slightly higher VSC in the baseline (11.85% to 13.44%) but are also constrained by oversailing of the floor plate above the windows and/or side projection adjacent.

7.617 The assessment reports that the 2 windows that achieve a factor of their former value below 0.60 (achieving 0.58 and 0.59) have low levels of VSC in the baseline (7.35 and 10.03%) as a result of oversailing of the first floor plate above the windows and side projection adjacent. As the VSC level is low in the baseline, again the relatively small reductions manifest as disproportionately large ratio reductions.

7.618 The NSL results show that 121 (98%) of the 123 rooms assessed satisfy the BRE guidelines. The remaining rooms achieve a factor of their former value ranging between 0.79 and 0.70.

7.619 The assessment reports that the reductions in daylight in this building are exaggerated by the presence of balconies, oversailing floor plate and side projections which result in the windows and rooms having blinkered view towards the site.

7.620 Overall, the ES assesses the effect on this receptor to be **Moderate Adverse (Significant)**.

Sunlight

7.621 With regards to sunlight, the ES reports that of the 681 windows tested, 657 (96%) would satisfy the BRE guidelines criteria for annual sunlight and 596 (88%) would satisfy the winter sunlight criteria. The ES reports that 71 buildings achieve full adherence with both Annual and Winter Probable Sunlight Hours (APSH and WPSH) and will retain values in line with BRE criteria and are therefore considered to experience a **Negligible (Not Significant**) effect. These are the following buildings:

- 1-22 Old Bellgate Wharf
- 1 to 22 and 27 to 50 Caravel Close
- 11 to 14, 17, 18, 20 and 32 to 40 Claire Place
- 1-40 Kedge House
- 19 and 20 Starboard Way
- 7 to 10 Omega Close
- 1-6 Omega Close
- 1 to 52 Wheat Sheaf Close
- 161 Mellish Street

7.622 A **Minor Adverse (Not Significant)** effect would be experienced at 61-67 Tiller Road whereby windows would experience reduction in ASPH however would satisfy the BRE guidelines for WPSH criteria.

7.623 The remaining buildings assessed are discussed in further detail below:

25 Caravel Close

7.624 This is a residential property contained within a flatted development located to the north-west of the site. The APSH results show that 2 of the 2 windows tested would satisfy the BRE guidelines on an annual basis and 1 (50%) would satisfy the BRE guidelines on a winter basis.

7.625 The assessment reports that on a room basis, the single room which these 2 windows serve satisfies the BRE guidelines for both annual and winter sunlight.

7.626 Overall, the ES assesses the effect to this receptor to be **Negligible (Not Significant)**.

16, 19 and 33 Claire Place

7.627 These 3 residential properties are located to the north-west of the site. The APSH results show that 10 (77%) of the 13 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 8 (62%) would satisfy the BRE guidelines on a winter basis.

7.628 On a room basis, the 7 rooms which these windows serve satisfy the BRE guidelines for both annual and winter sunlight.

7.629 The ES therefore assesses the effect to these receptors to be **Negligible (Not Significant)**.

34 and 35 Claire Place

7.630 These 2 residential properties are located to the north-west of the site. The APSH results show that 15 (94%) of the 16 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 13 (81%) would satisfy the BRE guidelines on a winter basis.

7.631 On a room basis, 4 of the 6 rooms which these 16 windows serve satisfy the BRE guidelines for both annual and winter sunlight. The remaining 2 rooms which are living dining rooms will satisfy the BRE guidelines on an annual basis, achieving APSH values of between 34% and 44% against the guideline of 25%. However, these rooms fall short of the guidelines on a winter basis and achieve a factor of their former value below 0.60. The assessment also reports that the kitchens to these 2 properties will be unaffected by the proposed scheme.

7.632 The ES assesses the effect to these receptors to be **Minor Adverse (Not Significant)**.

1 to 8, 10 to 14, 16 and 17 Starboard Way

7.633 These residential properties are located to the north of the site. The APSH results for these 15 properties show that 60 of the 60 windows tested for APSH would satisfy the BRE guidelines on an annual basis and none would satisfy the BRE guidelines on a winter basis.

7.634 On a room basis, all 45 rooms would achieve the guidelines on an annual basis and all of these rooms achieve a factor of their former values below 0.60 during the winter months. The assessment reports that the annual sunlight levels to the living rooms within these properties range between 45% and 54% against a guideline of 25%.

7.635 The ES assesses the effect to these receptors to be **Moderate Adverse (Significant)**.

9 and 18 Starboard Way

7.636 These 2 properties are located to the north of the site. The ASPH results for these properties show that 8 of the 8 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 3 (38%) would satisfy the BRE guidelines for WPSH.

7.637 On a room basis, 3 of the 6 rooms which these 8 windows serve satisfy the BRE guidelines for both APSH and WPSH. These rooms include the main living rooms within each property.

7.638 The remaining 3 rooms are bedrooms which are less important in the consideration of sunlight by BRE guidelines. The assessment reports, however, that these rooms retain either 3% or 4% winter APSH against the recommended BRE target of 5%.

7.639 Overall, the ES assesses the effect to these receptors to be **Minor Adverse (Not Significant)**.

15 Starboard Way

7.640 This property is located to the north of the site. The APSH results show that 4 of the 4 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 2 (50%) would satisfy the BRE guidelines for WPSH.

7.641 On a room basis, 2 of the 3 rooms which these 4 windows serve satisfy the BRE guidelines for both APSH and WPSH. The remaining room (a living room) would satisfy the BRE guidelines on an annual basis and retain 4% WPSH, just under the 5% recommended by BRE.

7.642 Overall, the ES assesses the effect to this property to be **Minor Adverse (Not Significant).**

11 to 15 Omega Close

7.643 These residential properties are located to the north of the site. The APSH results for these properties show that 26 (72%) of the 36 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 32 (89%) would satisfy the BRE guidelines for WPSH.

7.644 On a room basis, 10 of the 15 rooms these 36 windows serve will satisfy the BRE guidelines for both APSH and WPSH. The assessment reports that the remaining 5 rooms are assumed bedrooms on the 2nd floor and will achieve a factor of their former values below 0.60 and retain between 20 and 24% APSH. However, these 5 rooms will satisfy the BRE guidelines for winter sunlight.

7.645 Overall, the ES assesses the effect to these properties to be **Minor Adverse (Not Significant)**.

16 Omega Close

7.646 This property is located to the north of the site. The APSH results show that 5 (71%) of the 7 windows tested for APSH would satisfy the BRE guidelines on an annual basis and 2 (29%) would satisfy the BRE guidelines for WPSH.

7.647 On a room basis, the ground and first floor rooms will satisfy the BRE guidelines on an annual basis and retain 3% and 4% winter APSH against the BRE recommended target of 5%. The assessment reports that the 2nd floor assumed bedroom will achieve a factor of its former value below 0.60 and retain 18% APSH. This room would satisfy BRE guidelines for WPSH.

7.648 Overall, the ES assesses the effect to this property to be **Minor Adverse (Not Significant)**.

Overshadowing

7.649 In respect of overshadowing, the ES has adopted two methodologies to assess overshadowing of public and private amenity areas: Sun Hours on Ground and Transient Overshadowing.

7.650 In relation to the Sun Hours on Ground test, the assessment requires that at least 50% of amenity areas should receive at least 2 hours of sunlight on 21st March to appear adequately sunlit throughout the year. If, as a result of new development, an existing amenity area does not meet the above, and the area that can receive 2 hours of sun on 21st March is less than 0.8 times its former value (i.e. a 20% reduction), then the loss of sunlight is likely to be noticeable.

7.651 For Transient Overshadowing, the assessment requires the plotting of a shadow plan to illustrate the location of shadows at different times of the day and year. The ES has therefore mapped the hourly shadows for the following three key dates:

- 21st March (Spring Equinox)
- 21st June (Summer Solstice)
- 21st December (Winter Solstice)

Sun Hours on Ground

7.652 The ES identifies 54 amenity spaces that were tested of which 38 (72%) would satisfy the BRE guidelines criteria for sunlight availability on 21st March by either retaining 2 hours of sunlight to at least 50% of their areas or by retaining greater than 0.8 times their former value. The assessment reports that the following receptors would achieve full adherence to the BRE guidelines and experience **Negligible (Not Significant)** effects upon construction of the proposed development:

- 1 to 7 Wateridge Close
- 1 to 7 Caravel Close
- 10-16 Tiller Road
- 16 to 19 and 21 to 32 Claire Place
- Starboard Way communal side garden (1 of 2 spaces).
- 9 to 13 and 15 Omega Close

7.653 The remaining 16 amenity spaces are discussed further below.

20 Claire Place

7.654 This residential property is located to the north of the site. The sunlight results for this property show that 1 amenity space assessed would not meet the BRE guidelines. The amenity space achieves below 0.60 times its former value. The assessment reports, however, that the area achieves 2 hours of sunlight to just 0.09% of its area in the existing condition and this is reduced to 0.0% in the proposed condition. The ES therefore considers that the small reduction manifests as a disproportionately large ratio reduction and that the difference in terms of what is experienced by the user is unlikely to be noticeable.

7.655 The ES therefore assesses the effect to this amenity area to be **Negligible (Not Significant)**.

1-10 Starboard Way

7.656 These 10 residential amenity spaces are located to the north of the site. The sunlight results for these properties show that none of the 10 amenity spaces assessed would meet the BRE guidelines. The 10 amenity spaces achieve below 0.60 times their former value.

7.657 The 10 amenity areas achieve 2 hours of sunlight to between 78.93% and 55.69% of their areas in the baseline condition which is reduced to 0.0% with the proposed development in place. These properties will still receive sunlight however they will not receive 2 hours of sunlight on the 21st March as required by BRE guidelines.

7.658 The assessment has, however, undertaken an assessment of these properties by applying a target of 1.5 hours on 21st March. When assessed against this target 3 of the amenity spaces will achieve 1.5 hours of sunlight to between 15% and 21% of their areas, 3 spaces between 1% and 6% and the remaining 4 spaces to 0% of their area.

7.659 When assessed against a target of 1 hour on 21st March, 1 of the 10 amenity spaces will achieve 1 hour of sunlight to 50% of their area, 5 spaces between 28% and 40%, and the remaining 3 spaces between 9% and 19% of their area.

7.660 When assessed against a target of 0.5 hours, 9 of the 10 amenity spaces will achieve 0.5 hours of sunlight to between 41% and 66% of their area and the remaining space to 29% of their area.

7.661 The ES also reports that on 21st June, the 10 amenity areas achieve 2 hours of sunlight to between 93.89% and 100% of their areas in the baseline condition and there would be no reduction in sunlight with the proposed development in place on 21st June.

7.662 Overall, the ES assesses the effect of the proposed development on these amenity spaces to be **Major Adverse (Significant)**

Starboard Way Communal Side Garden.

7.663 These communal amenity spaces are located to the north of the site. The sunlight results show that 1 of the 2 spaces assessed would meet the BRE guidelines. The remaining space achieves below 0.60 times its former value.

7.664 When assessed against a target of 1.5 hours, the amenity space that does not meet the BRE guidelines will achieve 1.5 hours of sunlight to 22% of its area.

7.665 When assessed against a target of 1 hour, the space will achieve 1 hour of sunlight to 45% of its area.

7.666 When assessed against a target of 0.5 hours, the space will achieve 0.5 hours of sunlight to 62% of their area.

7.667 The assessment reports that there will be no reduction in sunlight with the proposed development in place on 21st June.

7.668 Overall, the ES assesses the effect to this amenity area to be **Moderate Adverse (Significant)**.

7 and 14 Omega Close

7.669 These 2 amenity areas are located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The sunlight results show that neither of the amenity areas would meet the BRE guidelines and would achieve below 0.60 times their former value.

7.670 The 2 areas assessed achieve 2 hours of sunlight to 28.64% and 39.15% of their area.

7.671 When assessed against a target of 1.5 hours, the amenity spaces achieve 1.5 hours of sunlight to 45% and 47% of their areas.

7.672 When assessed against a target of 1 hour, the two spaces will achieve 1 hour of sunlight to 60% and 62% of their area.

7.673 When assessed on 21 June, the two areas assessed achieve 2 hours of sunlight to 84.84% and 93.96% of their areas in the baseline condition. There will be no reduction in sunlight with the proposed development in place on 21 June.

7.674 The date upon which the amenity spaces achieve the guideline values (achieving either 0.8 times their former value or 2 hours of sunlight to over 50% of their areas) is 25th March for both of these spaces which is just outside of the guideline of 21st March.

7.675 Overall, the ES assesses the effect to these amenity areas to be **Major Adverse (Not Significant)**.

8 and 16 Omega Close

7.676 These 2 amenity areas are located to the north-east of the site on the corner of Greenwich View Place and Millharbour. The sunlight results show that neither of the amenity areas would meet the BRE guidelines and would achieve below 0.60 times their former value.

7.677 The 2 areas achieve 2 hours of sunlight to 46.42% and 44.09% of their area in the proposed condition, just under the 50% BRE recommended target.

7.678 When assessed against a target of 1.5 hours, the amenity spaces achieve 1.5 hours of sunlight to 53% and 47% of their areas.

7.679 When assessed against a target of 1 hour, the 2 spaces will achieve 1 hour of sunlight to 69% and 51% of their areas.

7.680 When assessed on 21st June, the 2 amenity spaces achieve 2 hours of sunlight to 97.53% and 89.61% of their areas in the baseline condition. There will be no reduction in sunlight with the proposed development in place on 21 June.

7.681 The date upon which the amenity spaces achieve the guideline values (achieving either 0.8 times their former value or 2 hours of sunlight to over 50% of their areas) is 23rd March for 8 Omega Close and 25th March for 16 Omega Close which is just outside of the guideline of 21st March.

7.682 Overall, the ES assesses the effect to these amenity areas to be **Moderate Adverse (Significant)**.

Transient Overshadowing

21st March:

7.683 The ES illustrates that on this day, the shadow is cast from the proposed development to the north-west from 08:00GMT. Claire Place, Starboard Way and Omega Close are partially overshadowed by shadow cast from the proposed development from 10:00GMT to 13:00GMT. Starboard Way and Omega Close are partially overshadowed by shadow cast from the proposed development from 13:00GMT to 17:00GMT. The remaining amenity areas are unaffected by shadow cast from the proposed development. In terms of overshadowing effects to the Millwall and West India Dock Site of Importance for Nature Conservation (SINC), there will be a slight increase in the overshadowing to a small part of the dock to the south of Glengall Bridge between 3pm and 5pm as a result of Tower 4 of the proposed development.

21st June:

7.684 The ES illustrates that at the Summer Solstice, the shadow is cast from the proposed development to the north-west from 06:00GMT. The amenity areas are unaffected by shadow cast from the proposed development at the Summer Solstice. On 21st June, there will be increased overshadowing caused by towers T2, T3, T4 of the proposed development to a small part of the dock and SINC to the east of the Dockland Sailing Centre between 6am

and 7am, and a small increase in overshadowing caused by towers T2, T3 and T4 adjacent to the dockside at 6pm.

21st December:

7.685 The ES illustrates that at the Winter Solstice, the shadow is cast from the proposed development to the north-west from 10.00GMT. Caravel Close, Claire Place, Starboard Way and Omega Close are partially overshadowed by shadow cast from the proposed development from 10:00GMT to 12:00GMT. Claire Place, Starboard Way and Omega Close are partially overshadowed by shadow cast from the proposed development from 12:00GMT to 14:00GMT. The remaining amenity areas are unaffected by shadow cast from the proposed development. There would be no overshadowing caused by the proposed development to the dock on 21st December.

Light Pollution

7.686 The ES reports that ILP (Institution of Lighting Professionals) GN01 (Guidance Note 01), 2021 Guidance for the Reduction of Obtrusive Light, establishes the relevant criteria that are used to describe light pollution effects (light spill, glare and source intensity, light trespass into windows and sky glow). The guidance also assigns environmental zones against which new developments should be assessed to establish the appropriate lighting designs for a site's context and relevant surroundings.

7.687 With reference to the ILP guidance and the location of the proposed development, the site is classified as within Environmental Zone E4 (Urban: Town/City Centres with high levels of night-time activity). The zone allows for a maximum pre-curfew light intrusion of 25 lux and a maximum post-curfew light intrusion of 5 lux.

7.688 The ES reports that pre-curfew (before 11pm), the levels of light spillage would be limited and well within the 25-lux threshold set out within the ILP guidance for a city centre location for all sensitive receptors assessed. In terms of the Millwall Outer Dock, the level of light spillage is predominantly 0-lux. However, the proportion of Millwall Outer Dock which borders the site shows levels of up to 15-lux for small areas to the south of each of the tower blocks at T1-T4.

7.689 The post-curfew (after 11pm) shows that the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for Zone E4 at all the residential sensitive surrounding receptors assessed. In terms of the assessment for the Millwall Outer Dock, the main part of the dock will experience lux levels of 0-lux. There is a limited area which receives lux levels above the 5-lux threshold, this being the area to the south of each of the tower blocks at T1-T4. This is indicated in the image below. The assessment reports that the total area of Millwall Outer Dock is approximately 96,500m2 and the area which shows light trespass above the 5-lux threshold is approximately 200m2 (equivalent to 0.21% of the total area).

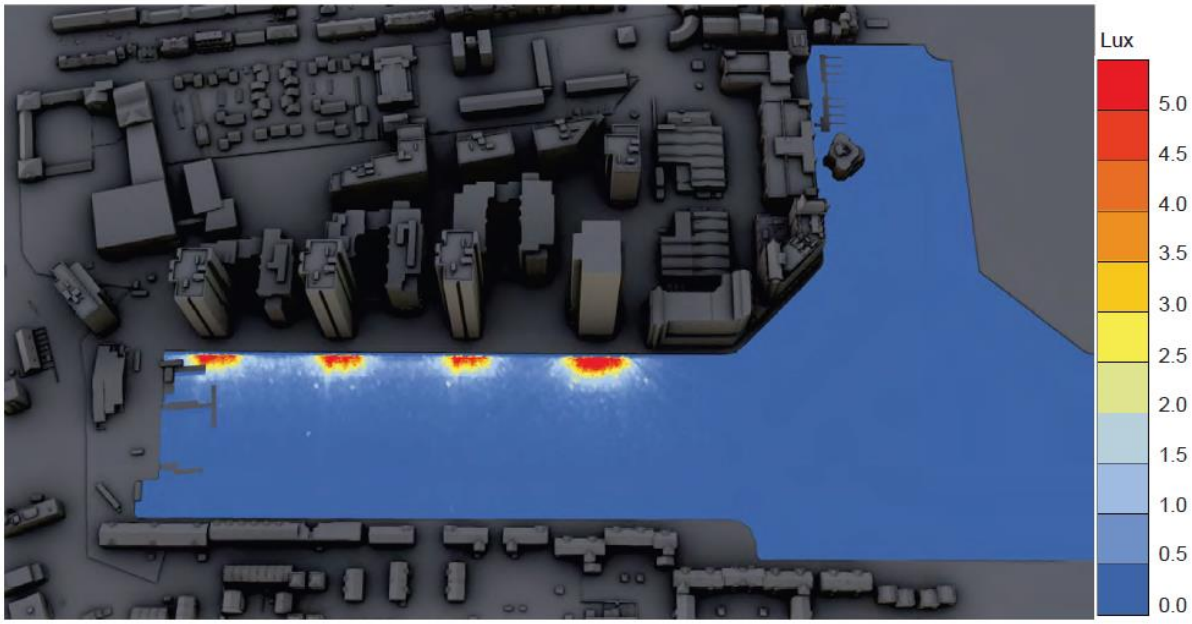


Figure 65: Millwall Outer Dock: Light trespass post curfew

7.690 Overall, the ES concludes that all of the neighbouring residential sensitive receptors are shown to experience levels of light trespass within the guideline values for both the pre and post curfew assessments. The ES assesses the overall effect of the proposed development on light spillage to neighbouring properties to be **Negligible (Not Significant)**.

7.691 In terms of Millwall Outer Dock, whilst the pre-curfew light trespass is within the guidelines, there would be limited areas which experience light trespass beyond the lux threshold post-curfew.

Solar Glare

7.692 The solar glare assessment has been undertaken from viewpoints on the DLR and key locations along Westferry Road which are considered sensitive in terms of solar glare and are within close proximity of the site. The assessment reviews the likelihood of reflective solar glare which can affect a driver's field of vision.

7.693 The following 6 sensitive viewpoints have been assessed:

- View 1 – DLR between Mudchute and Crossharbour (Northbound)
- View 2 – DLR between Crossharbour and Mudchute (Southbound)
- View 3 – Travelling an easterly direction at the junction of Claude Street and Westferry Road.
- View 4 – Travelling in a northerly direction along Westferry Road approaching junction with Dockers Tanner Road and pedestrian crossings.
- View 5 – Travelling in a northerly direction along Westferry Road adjacent to Arnhem Wharf Primary School.
- View 6 – Travelling in an easterly direction at the junction of Arnhem Place and Westferry Road adjacent to Arnhem Wharf Primary School.

7.694 The ES concludes that the likelihood of the potential for solar glare to occur in all the above viewpoints would be **Negligible (Not Significant)**.

Cumulative Impact

7.695 The cumulative daylight/sunlight effects on nearby residential receptors have been assessed within the ES as a proposed development + consented schemes scenario against the baseline scenario (existing site cleared). The consented scheme considered in this

cumulative scenario is the single scheme at 49-59 Millharbour, 2-4 Muirfield Cresent and 23-39 Pepper Street (PA/16/03518).

7.696 The assessment reports that the majority of the windows assessed will either not be affected by the consented scheme at 49-59 Millharbour, 2-4 Muirfield Cresent and 23-39 Pepper Street, or the losses will be so small that the magnitude of impact will remain the same as they face away from the consented scheme and towards the proposed development.

7.697 There are 3 receptors (1-6 Omega Close, 61-97 Tiller Road and 161 Mellish Street) that are close enough and have windows facing the proposed development which would also have a view of the scheme at 49-59 Millharbour, 2-4 Muirfield Cresence and 23-39 Pepper Street.

7.698 In terms of daylight received, the VSC results show that 140 (66%) of the 213 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the remaining 73 (34%) windows, 47 would achieve a factor of their former values ranging between 0.79 and 0.70, 23 between 0.69 and 0.60 and 3 below 0.60.

7.699 The NSL results show that 134 (99%) of the 136 rooms assessed would satisfy the BRE guidelines by retaining at least 0.8 times their former values. The remaining 2 (1%) rooms would achieve a factor of their former values ranging between 0.79 and 0.70.

7.700 The assessment reports that 1-6 Omega Close would experience a **Minor Adverse (Not Significant)** effect in the VSC and/or NSL tests.

7.701 The remaining 2 properties are discussed further below.

61-97 Tiller Road

7.702 The VSC results show that 128 (69%) of the 186 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 64 (34%) remaining windows, 37 would achieve a factor of their former values ranging between 0.79 and 0.70, 19 between 0.69 and 0.60 and 2 below 0.60.

7.703 Ten of the 19 windows that achieve values ranging between 0.69 and 0.60 achieve low levels of VSC in the baseline (between 4.6% and 6.67%) as a result of oversailing of the floor plate above the windows. As the VSC levels are low in the baseline, the assessment reports that relatively small reductions manifest as disproportionately large ratio reductions. Two further windows serve living rooms with a primary window that achieves an absolute VSC over 30%. The remaining 2 windows have a blinkered view of the sky due to a side projection and oversailing balcony. The 5 remaining windows serve bedrooms that are oversailed by projections above and/or blinkered by projections beside the window.

7.704 The 2 windows that achieve a factor of their former value below 0.60 are blinkered by a projection above and the side of the window.

7.705 The NSL results show that 121 (98%) of the 123 rooms assessed satisfy the BRE guidelines. The remaining 2 (2%) rooms achieves a factor of their former values ranging between 0.79 and 0.70.

7.706 Overall, the ES assesses the effect to these properties in the cumulative scenario to be **Moderate Adverse (Significant)**.

7.707 In terms of the cumulative sunlight effects on these properties, the APSH results show that 174 (94%) out of 186 windows assessed for APSH would satisfy BRE guidelines on an annual basis. Of the 12 (6%) remaining windows, 11 would achieve a factor of their former value ranging between 0.79 and 0.70 and 1 ranging between 0.69 and 0.60. In terms of WPSH, the results show that all 186 windows tested would satisfy the BRE guidelines on a winter basis.

7.708 Overall, the ES assesses the effect to these properties to be **Minor Adverse (Not Significant)**.

161 Mellish Street

7.709 This 4-storey flatted building is located to the north of the site on the northern side of Tiller Road. The VSC results show that 2 (25%) of the 8 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the 6 (75%) remaining windows, 2 would achieve between 0.79 and 0.70 of their former value, 3 would achieve between 0.69 and 0.60 and 1 just below 0.60 (0.59).

7.710 The 2 south-facing windows that achieve between 0.79 and 0.70 retain a VSC of 15.42% and 22.40%. The 4 windows that achieve between 0.69 and 0.60 and below 0.60 are east-facing windows that look towards the consented scheme at 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street. The retained levels of VSC for these 4 windows ranges between 17.02% and 19.81%.

7.711 The NSL results show that 4 out of the 4 rooms assessed satisfy the BRE guidelines.

7.712 Overall, the ES assesses the effect to this property to be **Moderate Adverse (Significant)** owing to the consented scheme at 49-59 Millharbour 2-4 Muirfield Cresent and 23-39 Pepper Street being a contributing factor to the VSC reductions.

7.713 In terms of sunlight impacts in the cumulative scenario, the assessment reports that 201 (94%) of the 213 windows tested would satisfy the BRE guidelines for annual sunlight and all the windows would meet BRE guidelines for winter sunlight.

7.714 The assessment reports that receptors 1-6 Omega Close and 161 Mellish Street achieve full adherence with BRE guidelines for both APSH and WPSH. The ES therefore assesses the effects to these properties to be **Negligible (Not Significant)**.

49-59 Millharbour, 2-4 Muirfield Cresent and 23-39 Pepper Street

7.715 The ES has also assessed the potential impact of the proposed development upon the consented scheme at 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street. The assessment considers the impact upon the lowest floor of residential accommodation within the scheme.

7.716 In terms of daylight impact, the VSC results show that 446 (99%) of the 450 windows tested for VSC would satisfy the BRE guidelines by either retaining a VSC of at least 27% or at least 0.8 times their former values. Of the remaining 4 (1%) windows, 3 would achieve a factor of their former values ranging between 0.79 and 0.70 and 1 between 0.69 and 0.60.

7.717 The NSL results show that all of the 266 rooms assessed would satisfy the BRE guidelines by retaining at least 0.8 times their former values.

7.718 Overall, the ES assesses the daylight impacts to this development to be **Minor Adverse (Not Significant)**.

7.719 In terms of sunlight impacts, all of the 232 windows tested would satisfy the BRE guidelines for both annual sunlight and winter sunlight criteria therefore the ES reports that the sunlight impacts to this development would be **Negligible (Not Significant)**.

Conclusions on Daylight, Sunlight, Overshadowing and Solar Glare

7.720 In conclusion, the ES demonstrates that of the receptors assessed for daylight, significant effects are likely to occur at 19 receptors, with 10 receptors (5, 6 & 7 Wateridge Close; 16-19 Claire Place; 7-9, 10, 11, 12, 13, 14 and 15 Omega Close and 61-97 Tiller Road) experiencing Moderate Adverse (Significant) effects (31-40% reduction) and 9 receptors (1 to 8 Starboard Way; 9, 10 to 14, 15, 16, 17 18, 19 & 20 Starboard Way and 16 Omega Close) experiencing

Major Adverse (Significant) effects (Over 40% reduction). All other receptors assessed will experience Negligible and Minor Adverse (Not Significant) effects.

7.721 In terms of receptors assessed for sunlight, significant effects are likely to occur at 4 receptors (1 to 8 Starboard Way, 10 to 14 Starboard Way, 16 and 17 Starboard Way) with all 4 receptors experiencing Moderate Adverse (Significant) effects (31-40% reduction). All other receptors will experience Negligible to Minor Adverse (Not Significant) effects.

7.722 In terms of the sun-on-ground and overshadowing to gardens and amenity spaces, the ES demonstrates that of the 54 amenity spaces tested, 39 amenity spaces achieve full adherence to the BRE guidelines. Significant effects will occur to 15 receptors (1-10 Starboard Way; Starboard Way communal side garden; 7, 8 and 14 Omega Close) with all experiencing Major Adverse (Significant) effects (Over 40% reduction).

7.723 The Daylight, Sunlight, Overshadowing, Light Spillage, Solar Glare and Solar Irradiance assessment has been independently reviewed by both the Temple Group (ES Chapter 12, NTS and ES Statement of Conformity) and Delva Patman Redler (DPR) who subsequent to clarifications sought, agree with the significance of effects assessed in the ES and the conclusions drawn.

7.724 Overall, whilst the scheme does identify adverse daylight and sunlight impacts to neighbouring properties, a scheme of this magnitude that seeks to optimise site capacity would inevitably result in some level of adverse impacts. The Mayor of London's 'Housing' Supplementary Planning Guidance states that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in accessible locations, and should consider local circumstances, the need to optimise housing capacity and the scope for the character and form of an area to change over time.

7.725 The scheme would result in reductions in daylight and sunlight some of which would be Major Adverse and as such would be contrary to relevant development plan policies that seek to protect neighbouring amenity. However, the proposal is considered to comply with the development plan as a whole. Whilst there are reductions in daylight and sunlight resulting from the development, in taking the wider regeneration benefits of the proposal into account the development is considered to be acceptable.

Noise & Vibration

7.726 The application has been accompanied by a Noise and Vibration Assessment forming Chapter 11 of the Environmental Statement (ES).

Construction Phase

7.727 The ES has considered a number of different stages of the construction programme to identify the potential effects at sensitive receptors in close proximity of the site. The ES reports that construction noise predictions indicate a Medium impact is only likely to be exceeded at receptors R2 (16-34 Clarie Place), R3 (1-20 Starboard Way), R4 (Winch House) and R5 (7-16 Omega Way) during the Year 2 Quarter 1 assessment phase. A Medium impact would be equivalent to a Moderate Adverse effect at high sensitivity receptors and thus deemed as Significant.

7.728 In terms of all other receptors, during all phases construction noise levels are predicted to be either a Low impact or a Very Low impact. These would be equivalent to a Minor Adverse effect and a Negligible effect respectively at high sensitivity receptors and therefore Not Significant. The assessment notes however, that whilst noise effects are identified as Not Significant, exceedances of the daytime 65 dB $L_{Aeq,T}$ LOAEL[22] are likely to occur throughout the construction programme, and all reasonable steps will be taken to mitigate and minimise

[22] LOAEL (lowest observed adverse effect level): the level above which adverse effects on health and quality of life can be detected.

the effects through adoption of BPM (Best Practicable Means), as defined in Section 72 of the Control of Pollution Act 1974.

7.729 In terms of construction vibration effects, receptors identified within the ES as being sensitive to vibration impacts are located between 20m to 120m. The ES reports that the results of the construction vibration predictions indicate that receptors assessed would experience either a Low impact (equivalent to Minor Adverse effect) or a Very Low impact (equivalent to a Negligible effect) and are therefore Not Significant. However, exceedances of the 0.3mm/s LOAEL may occur and as such construction vibration emissions will be reduced as far as practicable through the implementation of BPM. In terms of piling activities, the estimated effects assume that vibration-generating activities are taking place at the part of the building footprint that is closest to each sensitive receptor. The assessment reports that it is likely that separation distances from piling locations to receptors will be greater than those presented in the ES. Consequently, vibration effects are likely to be lower than those identified for the majority of the construction period and, as such, a worst-case scenario has been assessed.

Construction Traffic Noise

7.730 Construction traffic noise has been assessed by considering the change in traffic flows as a result of the proposed development with reference to both the Calculation of Road Traffic Noise 1988 (CTRN) and the Design Manual for Roads and Bridges (DMRB). The assessment of noise impacts has been undertaken with reference to the following three scenarios: 2023 Baseline; 2023 Baseline + Peak Construction Traffic, April 2026 to Sept 2026; and 2023 Baseline + Peak Construction Traffic, Sept 2028 to July 2029. Road traffic noise levels have been calculated using CRTN methodology which contains an equation for the calculation of the Basic Noise Level (BNL) from a road in terms of the 18-hour Average Annual Weekday Traffic (AAWT) flow from 06:00 to 24:00.

7.731 The ES reports that the majority of construction traffic will access the site from the north via Westferry Road and Millharbour. The assessment of construction traffic noise calculations for peak construction traffic periods indicates a worst-case increase of 2.2dB due to construction traffic on Millharbour between Muirfield Crescent junctions. A change in road traffic noise of this magnitude would be equivalent to a Minor Adverse effect (Not Significant). At receptors adjacent to all other road links that would be used by the construction traffic, noise effects are Negligible (Not Significant).

Operational Road Traffic Noise (Completed Development)

7.732 The ES has assessed the operational traffic noise effects associated with the proposed development by calculating the CRTN BNL and comparing the change. The assessment reports that calculations of road traffic noise indicate a worst-case increase of 1.1dB due to operational traffic on Millharbour between Muirfield Crescent junctions. At this location, a change in road traffic noise of this magnitude is equivalent to a Minor Adverse effect (Not Significant). In terms of all other receptors assessed, the change in road traffic noise is equivalent to Negligible effect (Not Significant).

Perceptible Vibration and Ground-borne Noise

7.733 The ES reports that underlying vibration levels at the site are significantly below the thresholds set out in British Standard guidance[23] and that predictions of re-radiated ground-borne noise levels into the worst affected bedroom also indicate that levels are significantly below best practice guidance. To minimise the potential for vibration to be transmitted into the new buildings, all items of fixed plant/equipment/machinery will be fitted with vibration isolation in line with manufacturer and CIBSE (Chartered Institution of Building Service Engineers) best practice guidance. In terms of operational vibration, this has been scoped out of the ES as this was previously determined to be significantly below the threshold of low probability of adverse effects and no new sources of vibration have been introduced to the area.

[23] BS 6472-1 Guide to evaluation of human exposure to vibration in buildings – Part 1.

External Amenity Noise Levels

7.734 The ES reports that future façade noise levels are expected to exceed the BS 8233[24] guidance level of 55 dB $L_{Aeq,T}$ recommended for external amenity of balcony areas. To comply with best practice, the scheme proposes to only include balconies on facades where noise levels do not exceed 55 dB. The assessment also reports that there may be exceedances of the target noise level for outdoor amenity areas, but the level of noise is not of a sufficient magnitude to be significant.

Mitigation Measures

7.735 Mitigation measures for construction-related activities are proposed to be set out in the Construction Environmental Management Plan (CEMP) which will be secured via a planning condition. The ES reports that mitigation measures covered in the CEMP will represent the adoption of Best Practicable Means. Examples of such measures include but are not limited to noisy plant or equipment being situated as far as possible from noise-sensitive buildings; an appropriate piling technique that is the least likely to cause adverse vibration impacts to be adopted (i.e. auger piling); noise-reducing barriers (e.g. site huts, acoustic sheds or partitions); exhaust silencers to be fitted on vehicles and mechanical plant to minimise noise emissions; and noise-emitting machinery which is required to be run continuously to be housed in suitable acoustically-lined enclosures. These are some of the mitigation measures proposed during the construction phase of the development.

7.736 In terms of the operational phase of the development, the ES reports that embedded mitigation within the proposed development will consist of largely ensuring that suitable glazing is selected so that desirable internal noise conditions are achieved. The glazing scheme will be finalised in the detailed acoustic design of the proposed development. No operational mitigation measures have been identified as being required.

Cumulative

7.737 The ES has identified five cumulative schemes that may case cumulative noise and vibration effects. Construction activities at the proposed development are predicted to result in noise and vibration effects that are Not Significant (both in relation to the proposed development in isolation and in the cumulative scenario). Cumulative schemes and the proposed development are located such that it is unlikely that simultaneous demolition and/or construction works will result in cumulative noise or vibration effects at nearby receptors. The ES therefore reports that cumulative demolition and/or construction noise and/or vibration effects would be Not Significant. No significant cumulative noise or vibration effects are likely to arise as a result of changes in operational road traffic noise or building services plant and no significant noise or vibration effects have been identified as a result of the proposed development either in isolation or in the cumulative scenario.

Conclusion

7.738 In conclusion, the relevant ES chapter demonstrates technical compliance is achieved with regards to relevant planning policies to ensure that future residents will enjoy a satisfactory standard of living accommodation within the dwellings, whilst also safeguarding existing background noise levels and neighbouring amenities. The Council's Environmental Health Officers and Temple who have been appointed to review the Environmental Statement on behalf of the Council have reviewed the relevant ES Noise and Vibration Chapter and, having assessed further clarifications requested, are satisfied with the conclusions drawn and the significance of effects assessed. Subject to details being submitted via condition requiring the submission of a post-completion verification report for the new residential units, and conditions imposing restrictions on noise from plant and on demolition and construction activities, there are no objections to the proposed development.

[24] BS 8233 – Guidance on sound insulation and noise reduction for buildings.

Construction Impacts

7.739 Chapter 5 (Construction) of the Environmental Statement describes and assesses the potential construction-related environmental impacts and resultant environmental effects of the proposed development. The application is also supported by a Construction Logistics Plan which notes an overall timeframe for construction of approximately 7 years with completion of the build expected to be in May 2031. Phases will be constructed in sequence (Phases 0-4), but overlapping of phases has been identified. The school is not identified as forming part of phases 0-4 as the school will be delivered by the Department for Education; however, the school is identified to be built out between years 0-2 and overlapping/in parallel with phases 1 and 2 of the development.

7.740 The construction of the development will follow the Council's Code of Construction Practice standard working hours. For vehicle movements this will be restricted to Monday-Friday: 09.30 – 16.30 hrs (no vehicle movements on Saturday, Sunday, Bank Holiday and Public Holidays) and Monday-Friday: 09.30 – 15.00 hrs along Westferry Road during school term time (where the site is close to a school).

7.741 Given the site's proximity to Arnhem Wharf Primary School, it is proposed that after 15.00 during term time, construction vehicles would access the site via Millharbour until 16.30. During school holidays, Westferry Road access would be used from 09.30 to 16.30. The Westferry Road construction access is intended to be the main construction access to the site. The Council's Code of Construction Practice Guidance also restricts standard working hours to Monday-Friday: 08.00 – 18.00 hrs.

7.742 During phases 0 to 3, Westferry Road would provide construction access in accordance with the hours and strategy set out above. Outside of school term time, all construction access would take place from Westferry Road during phases 0 to 3. During Phase 1, the CLP states that two separate points of construction vehicle access from Westferry Road would be provided: one for the school and one for the wider development. Traffic marshals would be present at both points of access throughout the build programme. Millharbour would be used by construction vehicles associated with Phase 4 of the development to minimise the potential for occupied residential development to conflict with construction traffic movement.

7.743 All HGVs accessing the site will be received by traffic marshals and vehicles will be directed to the relevant loading/unloading area within the site. All vehicles would be required to enter and exit the site in a forward gear and all traffic can access and turn within the site.

7.744 In terms of construction-related vehicle trips, the ES identifies the anticipated average number of vehicles per day over the duration of the construction programme. This assumes 5 days per week for deliveries, 50 weeks per year and 8 bank holidays. The assessment reports that it is assumed that approximately 90% of vehicles would be HGVs (box vans, low loaders, articulated lorries, ready mix concrete lorries, mobile cranes, skip lorries, 32 tonne tipper trucks or similar), and 10% smaller vehicles. The overall peak trip (one-way) for all vehicles would be 143 vehicle trips (including those associated with the school) per day in Year 2 (assumed to be 2026), when the school, phase 1 and phase 2 construction overlaps. Of these 143 vehicle trips, 128 would be expected to be HGVs. Delivery hours would be restricted to 09.30-16.30 on weekdays only and 09.30-15.00 (during school term time) as required by the Council's Code of Construction Practice.

7.745 In terms of the school specifically, the ES reports that there would be 14 vehicles entering and leaving the site per day, of which 13 vehicles are HGVs. This would be equivalent to 3 vehicles every hour with 1 vehicle entering the school gate every 20 minutes during the peak hour.

7.746 The peak number of vehicles entering and leaving the Westferry Road entrance (excluding the school construction vehicles) would be expected to be 130 vehicles entering and leaving per day. HGVs entering the site would be 117 vehicles per day and the peak would be expected in Q2 Year 2, when phases 1 and 2 works overlap. The vehicles at this gate would be equivalent to 17 vehicles per hour arriving.

7.747 The peak construction vehicles for the Millharbour Road route and entrance to the proposed development would be indicatively 40 vehicles in and out per day of which 36 would be HGVs

and would be equivalent to 6 vehicles per hour. This would occur during phase 4 of the construction and in year 5 of the construction programme.

7.748 No permanent road closures are required for the construction of the development, including the school. Any temporary road closures proposed would be restricted to any partial closure of Westferry Road to facilitate proposed highway alterations near the Westferry Road gate.

7.749 Officers acknowledge that demolition and construction activities are likely to cause some additional noise and disturbance, additional traffic generation and dust. However, the ES assumes that several measures would be in place to manage potential environmental effects associated with the construction. In accordance with relevant development plan policies, the Applicant would be expected to adhere to the Council's Code of Construction Practice and this will be secured via the imposition of a condition which will require the Applicant to submit to the Council, for approval, a section 61 application and a number of technical documents such as, but not limited to, a Construction Management Plan, a Construction Logistics Plan, a Traffic Management Plan and a Site Environmental Management Plan.

7.750 In addition to the above, the Council's Planning Obligations Supplementary Planning Document seeks a contribution of £1 per square metre of non-residential floorspace and £100 per residential unit towards Development Co-ordination and Integration. This would assist the Council in managing construction activity both on-site and within the surrounding streets and spaces proactively and strategically across the Borough. This would be secured via the S106 legal agreement should planning permission be granted for this development.

TRANSPORT

7.751 The NPPF recognises that sustainable transport has an important role to play in facilitating sustainable development by promoting walking, cycling and public transport use but also contributing to wider health and environmental objectives to reduce congestion and emissions, and improve air quality and public health. It is expected that new development will not give rise to conflicts between vehicular traffic and pedestrians.

7.752 Policies T1 to T6.1 of the London Plan seek to ensure that impacts on transport capacity and the transport network, at local, network-wide and strategic level, are fully assessed. Furthermore, development should not adversely affect safety on the transport network. Policy T6 of the London Plan (Part B) states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development should still ensure, as a minimum, that for 3% of dwellings at least 1 designated disabled persons parking bay per dwelling is available from the outset (Policy T6.1 (Part G(1)). Policy T7 (Part G) of the London Plan requires development proposals to facilitate safe, clean, and efficient deliveries and servicing.

7.753 The above policies are echoed in Local Plan Policies S.TR1, D.TR2, D.TR3 and D.TR4 which require proposals to give consideration to the local environment and accessibility of the site, on-street parking availability, access and amenity impacts and road network capacity constraints, while supporting the Council's commitment to reduce the need to travel and encourage modal shift away from the private car towards healthy and sustainable transport initiatives and choices, notably walking and cycling. Policy S.TR1 particularly promotes the need to prioritise pedestrians and cyclists as well as access to public transport, including river transport, before vehicular modes of transport.

7.754 Policy D.MW3 requires all new developments to include sufficient accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole.

Access, Movement and Connectivity

<u>Vehicular Access</u>

7.755 As described in the Site and Surroundings section of this report, the site has a PTAL of 3 on a scale of 1 to 6 where 6b is considered excellent. The key local highway network routes that

provide access to the site and serve the wider locality are the A1206 Westferry Road to the west, Millharbour to the north-east, Marsh Wall to the north and the A1261 Aspen Way further north beyond Marsh Wall.

7.756 Westferry Road is a single lane, two-way classified route (A1206) which runs north-south along the western side of the Isle of Dogs and is subject to a 20mph speed limit. Westferry Road provides for a number of bus routes, with pedestrian footways provided on both sides of the carriageway. In the immediate vicinity of the site by the Westferry Road frontage, the footway is approximately 2.0m to 2.5m wide. Westferry Road also has a signal-controlled pedestrian crossing circa 65m to the north of the site and a zebra crossing approximately 150m to the south of the site boundary. To the south, Westferry Road routes towards Island Gardens and becomes Manchester Road. Marsh Wall has a two-way single-lane carriageway which connects the Preston's Road/Marsh Wall/East Ferry Road roundabout junction with the gyratory junction of Westferry Road and Heron Quay. Marsh Wall also provides a pedestrian bridge access across South Dock, via Admirals Way.

7.757 The site's primary access is taken from Westferry Road with a secondary access on its eastern side from Millharbour. Millharbour is a single carriageway, two-way road which terminates at the site's eastern entrance. At this terminus, Millharbour provides a circular turning head for traffic from which access is provided to a number of commercial development sites.

7.758 As detailed previously, the proposed scheme largely adopts the same site layout principles as the consented scheme with a Boulevard running through the site connecting Westferry Road to Millharbour and secondary north-south routes running through the site. To prioritise pedestrians and cyclists, vehicular access to and through the site will be restricted. Blue badge holders and servicing vehicles will be permitted to access the site from Westferry Road and Millharbour and only vehicles associated with the development will be permitted to access with no general traffic permitted for entry. As such there will be no ability to use the Boulevard as a through route between Westferry Road and Millharbour by general traffic.

7.759 Vehicular access will be granted to residents via an Automatic Number Plate Recognition (APNR) system as would servicing vehicles (as detailed below). All authorised vehicles are expected to enter and exit the site via Westferry Road to reduce traffic impact on Millharbour. Where vehicles are not pre-registered, they will be required to stop before rising bollards at the site entrances. The rising bollard system would be provided with an intercom, which would allow residents and visitors to speak with the Site's security team. The intercom and APNR camera would be mounted on an island that separates the entry and exit lanes. The entry-controlled bollards would retract automatically when authorised vehicles approach. Rising bollards will also be provided at the Millharbour Site Access to control vehicular access but maintain permeable access for pedestrians and cyclists. Access control utilising ANPR to admit authorised vehicles, supported by an intercom that connects with the site's security team, will also be deployed.

7.760 It is proposed that the access control is located approximately 40 metres to the east of Westferry Road. This would enable inbound vehicles to wait at the rising bollards, without obstructing the free flow of pedestrians or vehicles along Westferry Road. At the site access from Westferry Road, a turning head would be provided, located approximately 10 metres to the west of the rising bollards. This would enable cars and small vans that are not permitted access to the site to turn and exit in forward gear, removing the need for vehicles to reverse into Westferry Road. A vehicular turning head already exists adjacent to the site access on Millharbour. All large servicing and delivery vehicles would be directed in a one-way journey through the site. The Council's Transport Officers have requested, however, that the scheme indicates potential locations where 'home delivery' type vehicles such as Amazon drivers would be able to turn within the site. The Applicant has provided three possible locations off the Boulevard where this could be accommodated without impacting on the proposed landscaping of the scheme.

7.761 Vehicular access to the school would be via Millwall Dock Road with servicing and delivery vehicles (and emergency access vehicles) directed to a secure gate located to the north of the school. The general vehicular movement strategy proposed for the scheme is indicated in the image below.

7.762 Commercial occupiers within the site would have access to on-site blue badge parking spaces and entry and exit to and from the site for commercial occupiers will operate on the same principles as above.

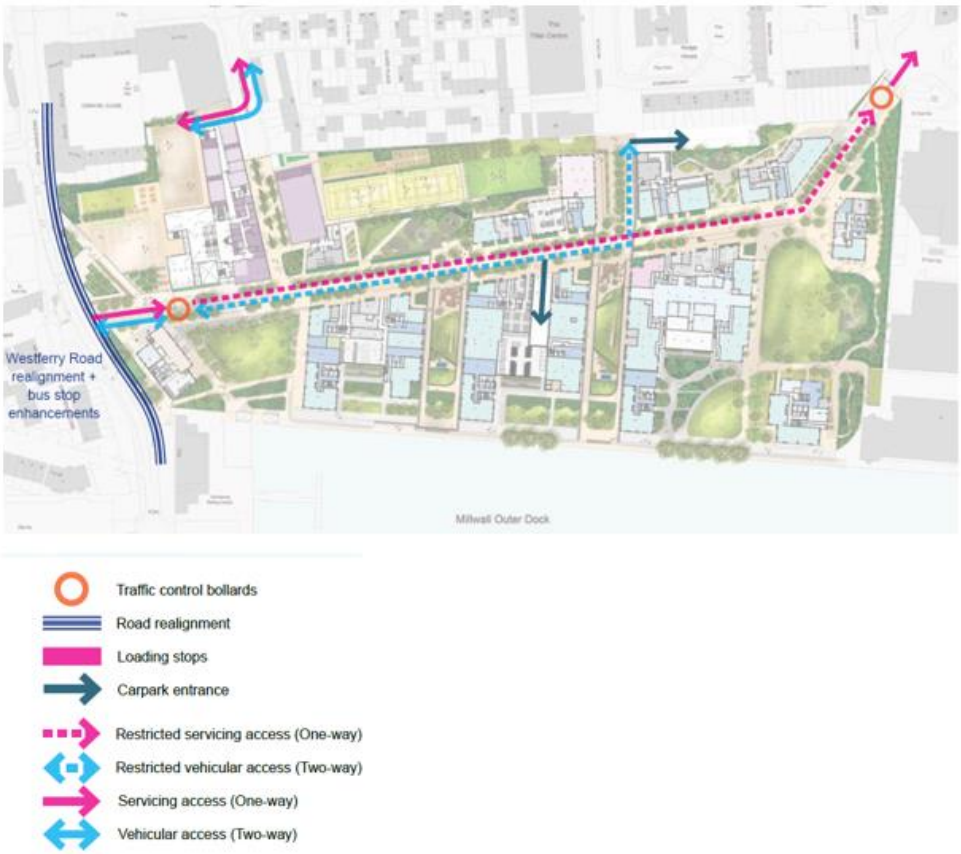


Figure 66: Vehicular movement strategy

Pedestrian and Cyclist Access

7.763 Pedestrian and cyclist access to the site would be via Westferry Road, Millharbour, Millwall Dock Road and Starboard Way. Movement within the site will be pedestrian and cyclist focused with the Boulevard forming the main east-west route through the site with secondary north-south spine routes seeking to reconnect the Millwall Dock Road and Starboard Way to the north to the redesigned towpath/promenade to the south. A new point of pedestrian access is proposed via Starboard Way however it should be noted that this is indicatively proposed at this stage and would be subject to any future redevelopment of the adjoining site. Additional routes are also created at the western end of the site from Westferry Road to allow direct visual connection to the dockside cranes and towpath when approaching from the north. To the east, a new pedestrian route towards the dock front is also introduced from Millharbour.

7.764 The Boulevard will also be designed as a shared surface to be used by pedestrians, cyclists and vehicles. Separate and parallel pedestrian-only routes would also be provided on both sides of the street separated from the carriageway by landscaping features. No dedicated cycle infrastructure is proposed along the Boulevard as the anticipated low level and controlled motor traffic using the route means that it would not be necessary to provide a separate dedicated cycle route within the site.

7.765 The public right of way along the promenade/towpath would be significantly improved as a result of the development. The route would be widened to connect directly with the areas of public realm and public open space proposed within the development. Officers would be seeking to secure via the S106 agreement that public access to these areas are maintained at all times.

7.766 The area in the vicinity of the site is well-served by cycle routes with Westferry Road and Millharbour both being routes signed for cyclists and forming part of the cycle network within the borough. National Cycle Network (NCN) Route 1 provides a designated cycle link from

the site to the Greenwich Foot Tunnel (via East Ferry Road and Mudchute Park) to the south, or north to Hackney and further afield (via Limehouse, Mile End Park and Victoria Park). Approximately 2.0km to the north of the site, NCN1 connects with Narrow Street which forms part of Cycleway 3 (formally Cycle Superhighway 3), which provides a route to the west towards central London, and to the east towards Barking. Cycleways 4, 10, 14 and 18 are also all located within a 20-minute cycle of the site.

Public Transport Accessibility

7.767 The site is well-positioned to be accessed by public transport services. The site is served by Canary Wharf Station which operates the Jubilee Line (which routes between Stanmore and Stratford) and Elizabeth Line services and is located approximately 1km and 1.25km to the north of the site respectively. These services provides a link to central London and key stations that provide interchanges.

7.768 The site is also located within close proximity of Crossharbour DLR station which is located approximately 375m from the site's Millharbour entrance. This section of the DLR provides services from Lewisham to Bank and journeys from Crossharbour to Bank connect with Heron Quay, Canary Wharf, West India Quay, Westferry, Limehouse and Shadwell. Services from Crossharbour also connect to Stratford.

7.769 Westferry Road is served by existing bus routes 135, 277, D7, N277 and N550 and northbound and southbound bus stops are located within the vicinity of the Westferry Road site access. Further bus services are also accessible from Crossharbour bus terminus, located adjacent to East Ferry Road, where bus routes D6 and D8 provide connection to Blackwall, Poplar, Bromley-by-Bow and Stratford.

Summary

7.770 In summary, Officers acknowledge that the site is supported by good transport connections and welcome and support the improved connections proposed across the masterplan which would facilitate greater opportunities for walking and encouraging active and healthy travel. The site currently acts as a physical severance between the residential developments to the north and the towpath to the south along Millwall Outer Dock. The masterplan will deliver an improved network of new streets which have been designed to improve the pedestrian experience, creating green and leafy routes which enable walking and cycling to be prioritised. The masterplan will also enhance and create opportunities for greater north-west connections to the new promenade along Millwall Outer Dock.

Road Network Changes

7.771 The scheme proposes localised road network changes adjacent to the Westferry Road site entrance which will be agreed and secured via an agreement under section 278 of the Highways Act 1980. S278 agreements allow developers to enter into a legal agreement with the Council (in the capacity as the Highway Authority) to make permanent alterations or improvements to the public highway, as part of a planning approval. The requirement to enter into a S278 agreement will be secured via the S106 Agreement should planning permission be granted for this development.

7.772 The works to the public highway include the realignment of Westferry Road along Westferry Road to improve forward visibility. The provision of a wider pavement outside of Arnhem Wharf Primary School (minimum 3.5m wide footway) will allow for easier pedestrian access to the school. As per the extant planning permission, it was originally proposed to relocate and extend the northbound bus stop on Westferry Road to enable the stop to cater for two buses at any one time. The southbound bus stop was also proposed to be extended however it would remain in its current location.

7.773 A new zebra crossing on Westferry Road positioned between the two bus stops is also proposed and will allow future residents, visitors and pupils to safely access the northbound bus stop. This will also allow parents and pupils associated with Arnhem Wharf School to safely access the southbound bus stop. On-street parking will be discouraged through the

provision of ‘zigzag’ markings on the approach to the zebra crossing and the introduction of double yellow line waiting restrictions.

7.774 TfL had initially objected to the proposal to relocate the existing bus infrastructure due to operational and pedestrian safety concerns. The Applicant has subsequently amended the Westferry Road site access arrangements so that the bus stops remain as existing. This is to ensure that the separation between the bus stop and the Arnhem Wharf school frontage remained. There would also be a minor increase in length of the northbound bus cage and the initial proposal to extend the bus stops to accommodate two buses at any one time has now been removed from the scheme. TfL have reviewed these amendments and have confirmed that the revised Westferry Road site access amendments are acceptable.

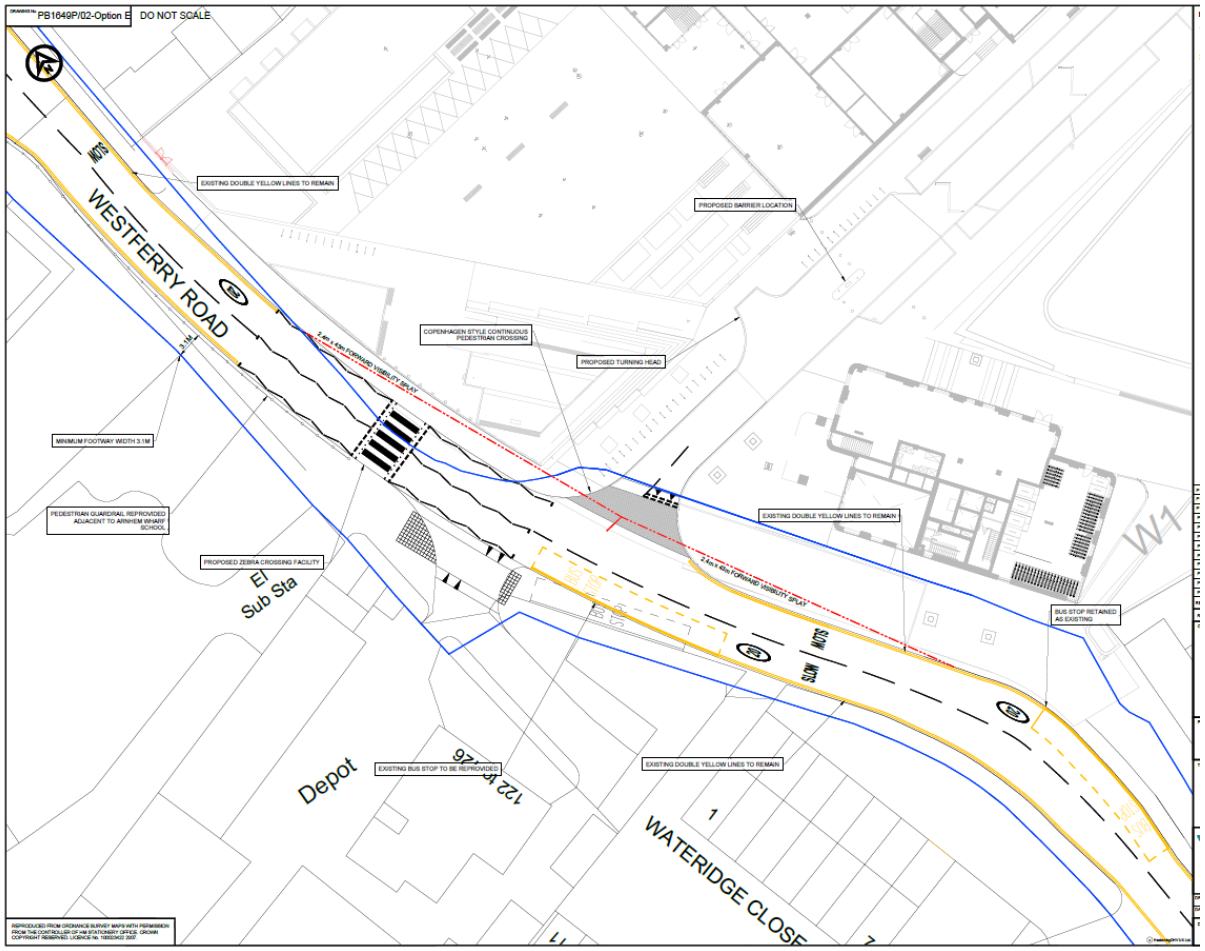


Figure 67: Westferry Road site access works

7.775 Additional highway works that are minor in nature are also proposed on Millwall Dock Road to facilitate access to the school. These works would be as per the consented scheme and include the removal of some on-street permit holder ‘business use’ car parking spaces. The Transport Assessment confirms that these business permit holder spaces on Millwall Dock Road were never fully utilised. A new coach parking bay located on Millwall Dock Road will be introduced which will be located within the vicinity of the school. Whilst on the public highway and not exclusively restricted to use by the school only, the bay could accommodate a coach or minibus on occasions a school trip is organised. It is anticipated that the use of the coach bay would be time-limited to prevent unauthorised car parking. The proposed school access will be provided as part of the S278 highways agreement to be secured via the S106 Agreement.

7.776 LBTH Transport Officers do not have any in principle objections to the road network changes proposed. In light of the bus stops being retained in the existing location, LBTH Transport Officers have requested a Copenhagen-style continuous pedestrian crossing at the Westferry Road entrance and this has been incorporated into the amended site access design.

Deliveries & Servicing (Including Waste)

7.777 The proposed Waste Management Strategy for the development has evolved from the strategy that was proposed under the extant planning permission.

7.778 Under the consented scheme, service vehicles (including refuse collection vehicles) were permitted to route from the Boulevard towards the dock with refuse collection taking place at ground floor level and Council refuse vehicles collecting residential waste from 1280 litre bins. It was proposed that the non-residential elements of the scheme were subject to a separate private waste collection contract. Service collection for the school was proposed to be undertaken via Millwall Dock Road.

7.779 Under the Appeal Scheme (which excluded the school site) it was no longer proposed to route service or refuse vehicles towards the dock to collect waste or service the residential development. All residential waste was proposed to be collected by the Council's refuse collection service and again with a commercial private collection servicing the commercial elements of the scheme. The Appeal Scheme maintained a traditional system of waste collection with a chute system in buildings T1-T5; however, the Waste Management Strategy for the Appeal Scheme introduced the provision of wheeled bin compactors within bin storage areas to compress residual waste and reduce the number of bins that require collection. No objections were identified to the Waste Management Strategy proposed under the Appeal Scheme.

7.780 The proposed development will continue to propose a vehicular connection between Westferry Road and Millharbour through the Boulevard as indicated below.

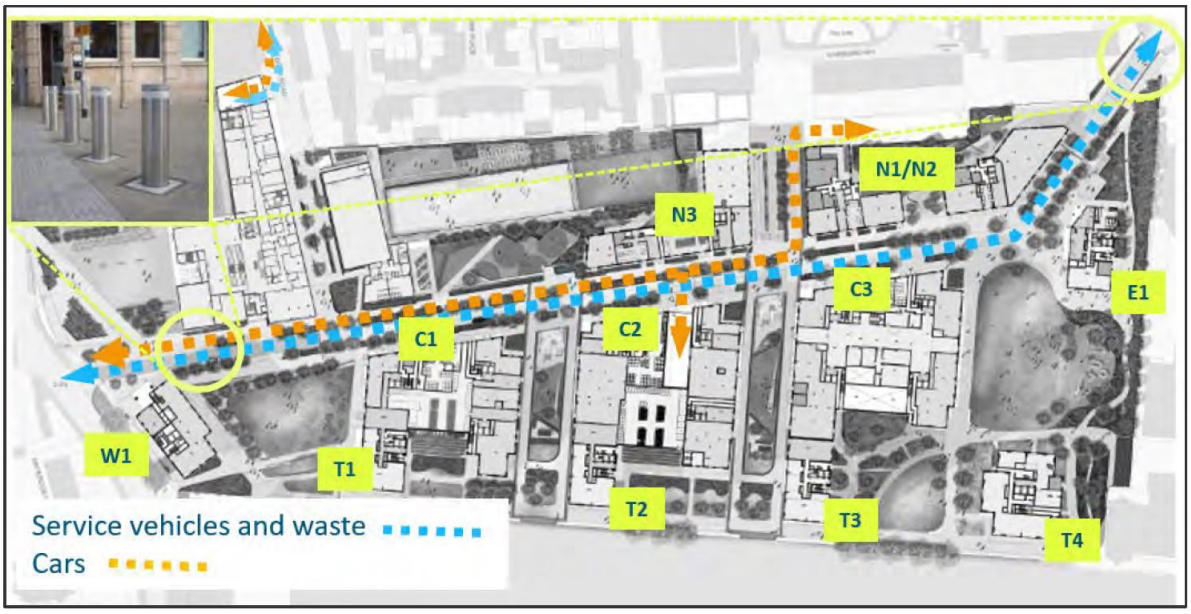


Figure 68: Service and waste vehicles access

7.781 The Boulevard would accommodate all vehicular movement, which will be limited because of the car-free nature of the development (with the exception of parking spaces for blue badge holders) and the implementation of the site access controls.

7.782 Refuse vehicles would be routed one-way through the site, east or westbound, removing the need for refuse collection vehicles to turn or reverse. The only exception would be the access to the commercial bin store located at the rear of Block N1, for which a dedicated service would be provided and a refuse collection vehicle would be required to reserve into this space.

7.783 The site's access from Westferry Road and Millharbour would be controlled by rising bollards and would operate with APNR cameras and an intercom control as detailed earlier. The ANPR bollards would fall automatically when an authorised vehicle approaches. Intercoms would enable a driver to request access, if required. The registration plates of all the Council's refuse vehicles would be contained within the ANPR system so that the bollards would fall when a refuse vehicle approaches.

7.784 Whilst the scheme for the site proposes a one-way strategy for servicing and refuse vehicles, the Waste Management Plan identifies that there would be the ability to turn a refuse vehicle (if needed) at the existing turning head at the terminus on Millharbour. This turning movement has been tracked and included within the Waste Management Plan demonstrating that a large refuse vehicle could, if required, leave the site to turn within Millharbour, before re-entering the site and continuing the round of collections.

7.785 Waste collection vehicles would service the residential development from the Boulevard (which will remain as private unadopted land) from bin stores as identified in the image below with the exception being the school which will be serviced from Millwall Dock Road. As such no waste collection will take place from the public highway.

Figure 69: Waste collection areas

7.786 *Site Management*: The management of the site will be undertaken by a management company with site management and security staff present on-site 24-hours a day. It will be the management company's responsibility to maintain the quality of the public realm and ensure that waste is collected in an efficient manner. The site management team would be required to support waste management on-site including taking an active role in the compaction of non-recyclable residential waste and ensuring that bins are located appropriately in the stores prior to collection.

7.787 Within dwellings, as per the LBTH Reuse, Recycle and Waste SPD (2021) the scheme will need to provide integrated containers installed for 3 streams: Food Waste (15ltr), Dry Recycling (40ltr) and Residual Waste (40 ltr).

7.788 *Chute System:* All the private residential blocks would be provided with chute systems which will take the form of a tri-separator system, which would allow residents to deposit recyclables, general waste and organic waste. The chute system would serve development blocks C2, C3, T1, T2, T3 and T4 which combined will accommodate 979 units. Blocks T1-T4 front onto Millwall Outer Dock thus located away from the Boulevard from which residential waste collection would be undertaken. Waste from these blocks would route via a chute into the base and the site's management team would be responsible for moving bins from the basement to waste stores that align with the Boulevard prior to collection. Residential blocks not served with a chute (Blocks C1, E1, N1, N2, N3 and W1) collection would operate on a 'resident bring' basis.

7.789 There are 8 residential bins stores proposed adjacent to the Boulevard and these stores would accommodate the waste generated by the building in which they are located, and the waste generated by buildings T1-T4 which would be moved by an electric tow to the ground floor stores, prior to collection.

7.790 *Residential Waste Compaction:* It is proposed to provide hydraulic euro bin compactors for each residential block. Compaction would be undertaken for all three tenures (private, intermediate and affordable) with the purpose of compressing residual (non-recyclable) waste. The compaction waste would be undertaken by site management or staff appointed by the

subsequent Affordable Housing Provider and only trained staff would be permitted to use the compaction units. Where compaction units are located in the basement, site residents would not have access to these areas. Where compactors are located in or adjacent to 'residents bring' waste stores (E1, W1, N1, N2 and N3), the compaction units would be locked down and secured to ensure that the units cannot be used by residents. When the ground floor compactors are in use, the 'residents bring' bin stores would be temporarily closed to resident access.

7.791 *Residential Waste Arisings:* The waste storage requirements for the proposed development have been prepared in accordance with the LBTH Reuse, Recycling and Waste Supplementary Planning Document (SPD). As such, the scheme will make provision for 65 x 1,280l bins for refuse, 95 x 1,280l bins for dry recyclables and 137 x 240l bins for compostables. However, the introduction of compaction for non-recyclable waste will reduce the bin storage requirement by approximately 58 bins.

7.792 *Walk Distance to Waste Stores:* All units within the development will be able to access their waste storage areas (or chute systems) within a 30 metre walk from their front door. Originally block N3 was the only building within the masterplan whereby occupiers of 52 units (in the eastern wing) within this block would have had a greater walking distance than 30 metres. Revisions to the ground floor of this building now includes an additional residential waste store which reduces the walk distance to the new storage location in the eastern side of the block to no more than 30 metres. The new waste store in building N3 includes a hydraulic euro bin compactor, which would be used to reduce the number of bins required for 'residual waste'. It should be noted, however, that due to the pedestrian access, landscaping and a level change on this side of the building, a refuse collection vehicle would not be able to wait to the east of block N3 to access the store. Therefore, the site's on-site management team would move the bins from the store to a presentation area alongside the Boulevard prior to the borough's waste collection team arriving on site.

7.793 *Bulky Waste:* A bulky waste store area is proposed within Block C3 and would measure 22.4sqm. The site's waste management team would manage the use of the bulky waste store and would coordinate its use and associated collections. All residents within the development would be required to contact the site management team to access the bulky waste store and the management team would arrange for a collection once the store is full.

7.794 *Commercial Waste (Excluding School):* The commercial waste from the site would be collected privately by a 'paid for' service and would take place at least once a week. All waste collection would be undertaken from the Boulevard, with the exception of a store located to the rear of Block N1. It is anticipated that the ground floor unit within Block N1 would operate as a convenience store and a dedicated service area is proposed, with direct access to the associated refuse store. The commercial occupiers would have access to 6 waste stores which would be separate from the residential waste stores therefore at all times commercial and residential waste will be segregated.

7.795 As end-user occupiers for the commercial units are not currently known, the Waste Management Plan has indicatively estimated the waste requirement based on an indicative range of uses. The preliminary calculation of waste arising from the commercial uses equates to an overall requirement of 57 x 1,280l bins across the site based on a weekly collection. The 6 commercial waste stores would have a combined capacity to store 89 x 1,280l bins which would be more than sufficient for a weekly collection. The collection of non-residential waste would be coordinated by the site's management team.

7.796 *Secondary School Waste:* The secondary school would accommodate waste within a dedicated waste storage area located within the school demise. Access to the waste store would be via a service/delivery bay, accessed from Millwall Dock Road. The school would have waste collected via a 'paid for' service and therefore would have the ability for waste collection to be undertaken weekly, twice weekly or more frequently depending on demand. The school would arrange both waste collection and the day-to-day servicing of the school so that vehicles do not arrive on-site at times when school children are likely to be arriving and departing the premises.

General Delivery and Servicing

7.797 In terms of the proposed delivery and servicing access routes to the site, it is proposed that vehicles will use the A1206/Westferry Road/Preston's Road to approach the site form the A1261 (Aspen Way). Delivery and servicing vehicles will use both the Westferry and Millharbour accesses to the site. The primary servicing and delivery routing for the site is indicated in the image below:

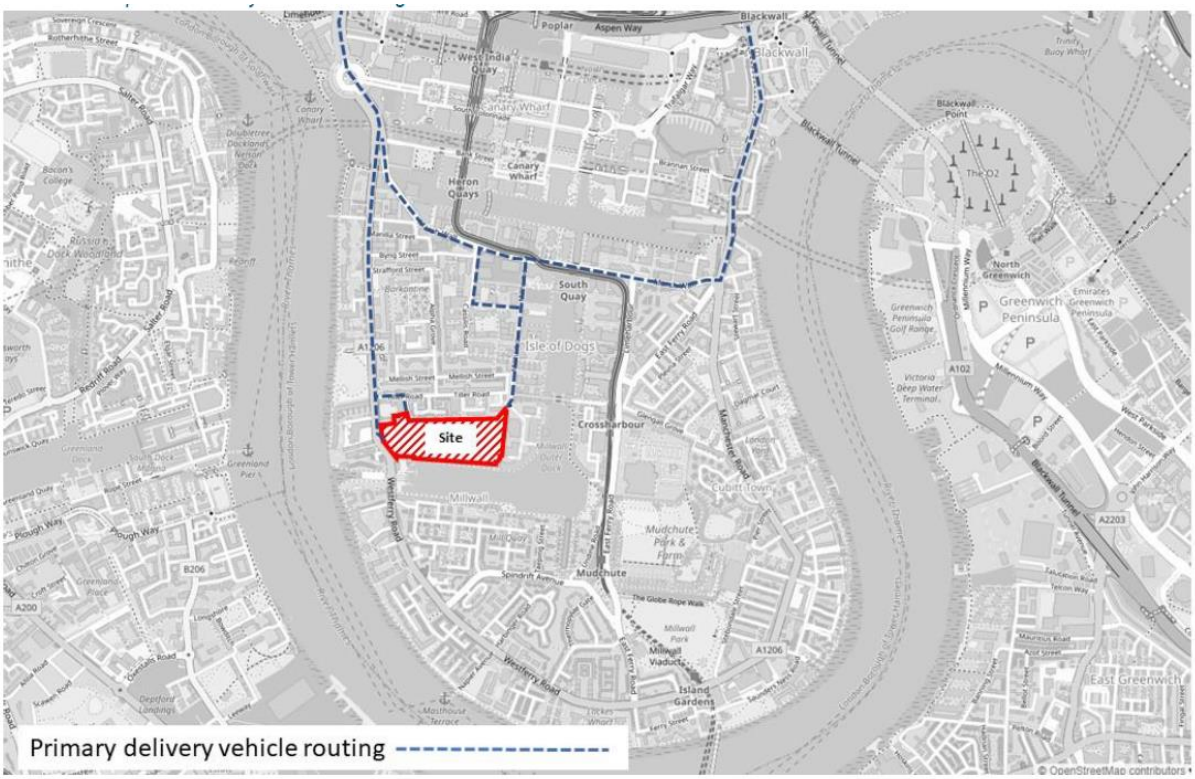


Figure 70: Delivery vehicle routes

7.798 Notwithstanding the above, delivery vehicles could use any highway within the Isle of Dogs and the above defined route would not prevent this. A high proportion of the site's delivery and servicing vehicle trips are likely to be residential parcel deliveries and home shopping deliveries. These vehicles would generally follow pre-defined routes, determined to minimise distance and journey times.

7.799 The access points on Westferry and Millharbour will be connected by the Boulevard which will have a carriageway width of 5.5m with delivery and servicing vehicles directed one-way (east or westbound). The ANPR system would control vehicular access but the site would remain permeable for pedestrians and cyclists. Vehicles not registered with the site's management team will need to use the intercom to speak to the site's concierge/security team who can permit access. The bollards are set back from Westferry Road to prevent waiting vehicles from encroaching onto Westferry Road. A turning head (suitable for cars and small commercial vehicles) would also be provided before the bollards to allow vehicles that are refused entry an opportunity to turn around and exit the site in forward gear. Any large service vehicles that are refused entry would be managed through the site by the on-site management team to exit onto Millharbour.

7.800 At Millharbour the entrance to the site adjacent to the mini-roundabout provides a turning facility in advance of the rising bollard as discussed earlier in this report in the context of waste vehicles. This roundabout only serves adjacent sites therefore there would be no through traffic beyond the roundabout.

7.801 The Boulevard would be sufficiently wide to accommodate larger vehicles and whilst a vehicle could service the development from the Boulevard, it is proposed to provide 4 delivery bays adjacent to the Boulevard to accommodate home shopping vehicles. The bays can

accommodate up to 8 home delivery vehicles at any one time. The location of the bays is indicated in the image below, with all bays located on the southern side of the Boulevard.

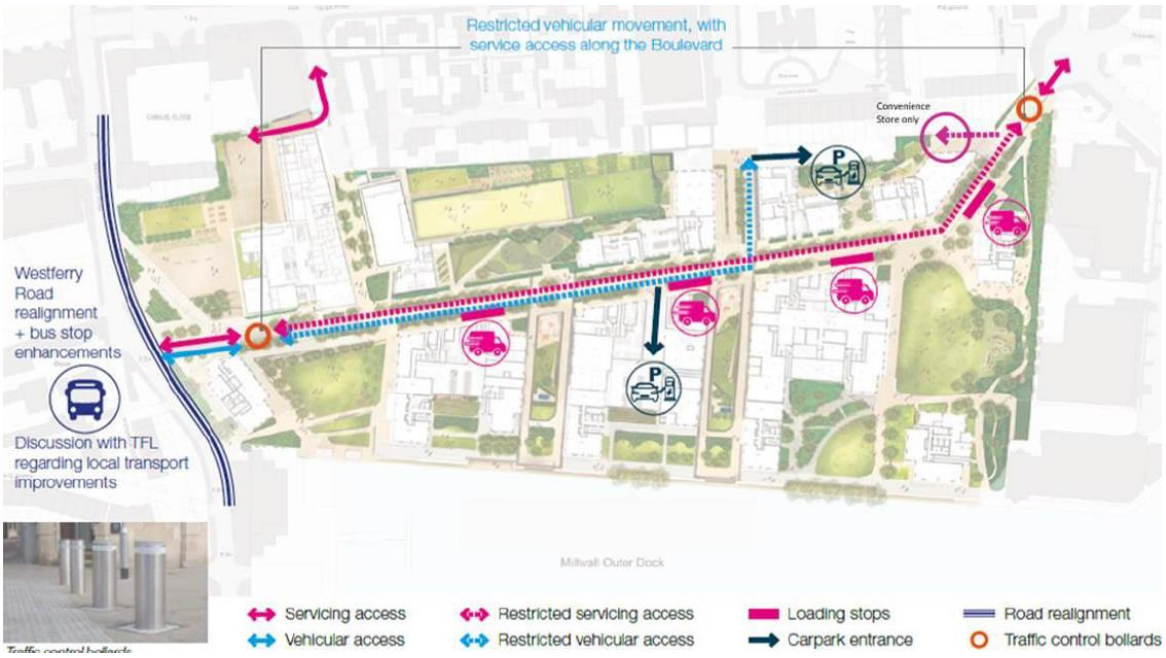


Figure 71: Locations of delivery and servicing bays

7.802 The majority of the items delivered to the site will be in form of mail and small packages that can be posted into the mailboxes on the ground level of each residential building. People delivering mail and small packages will be allowed to access the foyer of each residential building to access the post boxes by the concierge via video intercom. Access to lifts, stairs and upper floors will not be permitted except for residents and accompanied guests. Any home food deliveries such as takeaways would need to be met at ground floor level by the resident, or the resident would need to allow the delivery driver access.

7.803 The site will also accommodate a residential concierge in building C3 which will be provided with a parcel store so that deliveries that arrive on-site when a resident is not at home can be stored and collected when the resident arrives home. This would mean that delivery drivers would not need to return to the site should a resident be away when the delivery arrives.

7.804 For the commercial occupiers and the school, deliveries would be made during opening hours and it would be the responsibility of the occupier or school to receive goods delivered.

7.805 Overall, the servicing, deliveries and waste strategies for the proposal are considered to be acceptable in principle and are supported by the Highways Officer and the Waste Team. Detailed strategies would be secured via planning conditions should planning permission be granted for this development.

Cycle Parking

7.806 Policy T5 of the London Plan and Policy D.TR3 of the Local Plan requires adequate cycle parking provision for the development. The submitted Transport Assessment confirms that cycle parking would be provided on-site to meet the 'long-stay' and 'short-stay' minimum requirements of the London Plan. The cycle parking provision will comprise a mix of two-tier stands, Sheffield stands and parking for non-standard cycles.

7.807 The residential component of the development will provide a total of 2,461 cycle parking spaces (2,426 long-stay and 35 short-stay spaces). The proposed non-residential component of the scheme (excluding the school) would be supported by a total of 207 cycle parking spaces (38 long-stay and 169 short-stay spaces). The proposed secondary school would be provided with 168 long-stay spaces and 12 short stay spaces.

7.808 Secure long-stay cycle parking areas are provided across the development at ground, basement and mezzanine levels depending on the building. Buildings C1, C2, N3 and W1 will

have cycle stores at ground level which can be accessed directly from the public realm. Cycle stores in N1 and N2 are provided on the ground floor and in the undercroft areas, accessed via the car ram to the north. Building E1 will include cycle stores on both the ground and mezzanine levels with the ground level used for the storage of non-conventional cycles, and a cycle access staircase fitted with a ramp/channel which assists cyclists to the mezzanine level cycle store. The cycle stores for T1-T4 and C3 are all proposed to be located in the large basement.

7.809 Should planning permission be granted for this development, Officers would be seeking to secure full details of these spaces via condition including the requirement to provide cycle parking in accordance with TfL's London Cycling Design Standards to ensure that cycle parking is provided to accommodate accessible and larger cycles to ensure that a diverse range of cycle parking provision is incorporated into the scheme.

Car Parking

7.810 The Isle of Dogs is located within Controlled Parking Zone D which operates Monday to Friday between the hours of 08:30 to 17:30. In accordance with Policy D.TR3 of the Local Plan which requires residential developments to be permit-free in terms of on-street car parking, future residents of the development will not be eligible to obtain on-street car parking permits (with the exception of existing residents eligible for the Council's permit transfer scheme). This will be secured via the S106 Agreement.

7.811 In terms of off-street car parking, the development is proposed to be car-free with the exception of 146 accessible car parking spaces. This will comprise 136 spaces allocated to the residential component of the development (equating to 10% as required by the London Plan), 2 spaces allocated to the school and 8 spaces allocated to the other non-residential components of the development.

7.812 The residential car parking spaces will be provided within the large basement beneath blocks C1, C2, C3, T1, T2, T3 and T4 with a separate semi-basement/undercroft beneath blocks N1 and N2. Two of the 136 residential parking spaces would be provided at surface level adjacent to the Boulevard. These 2 spaces would serve block W1 which would not have direct access to the basement area. These 2 spaces would be located within a 50-metre walk of block W1. 124 spaces are provided at basement level, accessed via a vehicle ramp within the building C2 footprint. These spaces will serve the residential accommodation in buildings C1-C3 and T1-T4. The remaining 10 spaces would be located in the undercroft area below buildings N1 and N2 and are intended to serve buildings N1-N3 and E1. These spaces are accessed via a dedicated shuttle lift connecting the public realm to the parking area below.

7.813 The image below indicates the distribution of the accessible car parking spaces across the masterplan. Those spaces indicated in pink depict the spaces that will comprise 3% from the offset. This equates to 41 spaces which will be distributed across all phases.

Figure 72: Distribution of car parking spaces

7.814 It is noted that TfL have expressed concerns that the scheme could over-provide blue badge spaces and that the basement space could be better utilised, for example as a sustainable last-mile delivery hub for e-cargo bikes. The Applicant has advised however that the blue badge spaces within the basement car park are set out around stair and lift cores that are distributed throughout the basement. As a consequence, no one area of the basement can easily be set aside for the creation of a meanwhile use and as such there would not be an area suitable to accommodate a last-mile delivery hub. A last-mile delivery hub would require motor traffic to enter the site to deliver goods which would then be distributed throughout the Isle of Dogs in smaller vehicles or cargo bikes. This would attract traffic movements to the site and would have implications for the development's proposed public realm. A last-mile logistics hub would include some lorry movements which cannot be accommodated under the current design proposals as there would need to be a substantial increase in headroom and changes to the design of the access ramp.

Trip generation

Residential Trip Generation

7.815 The submitted TA has undertaken a TRICS-based assessment of the proposed development to determine the anticipated level of traffic generation for the proposed development. In terms of residential car trips, the total person residential trip rates forecast demonstrates that in the AM Peak Hour (08:00 – 09:00) there would be 5 arrivals and 17 departures, and 17 arrivals and 11 departures in the PM Peak Hour (17:00 – 18:00). In terms of residential trip generation across all modes of transport there would be 159 arrivals and 747 departures in the AM Peak Hour and 473 arrivals and 220 departures in the PM Peak Hour. Compared to the extant planning permission which accommodated 722 residential units, there would be 423 additional person trips with +74 arrivals and +349 departures in the AM Peak Hour and 326 additional person trips in the PM Peak Hour with +222 arrivals and +104 departures. However, the TA reports that as a result of the proposed reduction in residential car parking provision at the site, there would be a reduction of 28 car trips in the AM Peak Hour (-4 arrivals and -24 departures) and a reduction of 10 car trips (-9 arrivals and -1 departure) in the PM Peak Hour compared to the extant planning permission.

Secondary School Trip Generation

7.816 In terms of the secondary school and associated pupil trips, the proposed development does not seek to change the capacity of the school compared to the consented scheme. However, updated Travel Plan Survey data has been relied upon to assess the expected trip generation.

The assessment reports that across all modes of travel, there would be 1196 pupil trip arrivals and 68 departures[25] in the AM Peak Hour (08:00-09:00) and 61 arrivals and 1076 departures in the hour between 15:00-16:00 when the school day ends. During the PM Peak Hour (17:00-18:00) there would be 7 arrivals and 120 departures.

7.817 The school is anticipated to accommodate 140 teaching or administration staff and it has been assumed that the majority of the school staff (120) would travel to and from the site between the hours of 08:00-09:00 and 17:00-18:00. During the AM Peak Hour there would be 120 arrivals and 0 departures and in the PM Peak Hour there would be 0 arrivals and 120 departures. The combined school pupil and staff trip generation across all modes of travel is indicated in the table below: There would be 1316 arrivals and 68 departures in the AM Peak Hour, 61 arrivals and 1076 departures during 15:00-16:00 and 7 arrivals and 240 departures during the PM Peak Hour.

Mode of Travel	Resultant Mode Split	AM Peak (08:00-09:00		School Day Ends (15:00-16:00)		PM Peak (17:00-18:00)	
		Arrivals	Depart's	Arrivals	Depart's	Arrivals	Depart's
National Rail	2.2%	30	0	0	20	0	9
Underground/ DLR	16.0%	211	0	0	173	0	38
Bus/tram	18.7%	247	0	0	203	0	44
Sub-total: Public Transport	***37.0%***	***487***	***0***	***0***	***396***	***0***	***91***
Taxi	0.2%	2	0	0	0	0	2
Car Driver	5.3%	70	68	61	61	7	9
Car Passenger (inc. car share)	6.5%	85	0	0	71	0	14
Motorcycle	0.0%	0	0	0	0	0	0
Cycle (including Scooting)	16.8%	221	0	0	193	0	28
Walk (inc. Park and Stride)	34.3%	451	0	0	355	0	95
Total		**1316**	**68**	**61**	**1076**	**7**	**240**

Table 10: School trip generation with staff and pupils combined.

7.818 In terms of the use of the school sports facilities out of hours (weekday evenings and weekends), the assessment reports that these facilities could attract up to 64 person trips per hour from 18:00 to 21:00 on weekday evenings and from 09:00 to 17:00 on weekends for both arrivals and departures across all modes of travel.

Commercial Uses

7.819 In terms of the non-residential land uses within the masterplan, as the proposed scale and nature of these units would serve local residents or employees, no trip generation assessment has been undertaken as this component of the development would not result in an impact on the local transport network. This approach was similarly adopted under both the extant planning permission and the Appeal Scheme.

7.820 There would be no on-site car parking proposed to support the restaurant and café uses within the masterplan with the exception of some blue badge parking. These uses are therefore not anticipated to attract traffic movements other than those associated with site servicing. The assessment reports that across all modes of travel, there would be 0 arrivals and departures in the AM Peak Hour (08:00-09L00) and 21 arrivals and 6 departures in the PM Peak Hour (17:00-18:00).

7.821 With regards to the crèche and community centre uses, these are likely to serve local demand and the adjacent community. For both uses, the TA confirms that it is not anticipated that these uses will result in traffic impact on the highway network. With reference to the community centre in particular, the majority of patrons are likely to be within walking distance of the facility.

[25] 68 departures are Car Drivers (Escort Trips).

Travel Planning

7.822 The application has been accompanied by a Framework Travel Plan which sets out a range of preliminary management strategies and measures to support and encourage sustainable travel, including walking, cycling and the use of public transport. The Framework Travel Plan is considered acceptable in principle and Officers would be seeking to secure either via a condition or through the S106 legal agreement, the submission of a finalised detailed Travel Plan should planning permission be granted for this development. A separate Travel Plan for the school will also be secured either via the s.106 legal agreement or condition.

Demolition and Construction Traffic

7.823 An Outline Construction Environmental Management Plan (CEMP) has been submitted with the application. LBTH Transport Officers have reviewed the submitted Construction Management Plan (CMP) and Outline CEMP and note that the estimated peak in vehicle movements would be 143 deliveries per day (2-way movements: 286 per day) of which 90% are assumed to be HGVs. The Transport Officers note that this estimate was made without the benefit of the contractor's input and that actual numbers could differ from the estimate. Transport Officers have expressed concerns over the capacity of Westferry Road to cope with this magnitude of traffic and therefore traffic surveys may be required to be undertaken to sensitivity test the combined impact of construction-related traffic from this and other schemes.

7.824 LBTH Transport Officers have also advised that they would wish to restrict the number of HGVs using Millharbour due to its narrow width and block paved surface. It should be noted that there is currently a vacant school building (River House Montessori School) along Millharbour which if the school site became reactivated in school use would be likely to further restrict the use of Milharbour. To mitigate the traffic impact, LBTH Transport Officers would expect the developer to install an on-site concrete batching plant (for materials to be delivered in bulk and at off-peak times) and the option of using the river for the transportation of bulk materials should be explored to decrease road freight. LBTH Transport Officers recognise, however, that Millharbour has been used for many development sites over the years and whilst construction-related traffic can cause nuisance, the Council would be seeking to minimise the impact of construction vehicles on the highway and on residents and businesses in the area.

7.825 It is noted that some objections raised relate to the construction phasing, but Transport Officers have no comments to make on the proposed phasing as this is essentially a matter for the developer. However, the developer's Construction Management Plans are assessed against the Council's Code of Construction Practice (CoCP) process and changes and suggestions may be made when deemed necessary. In terms of off-site holding areas, Transport Officers have confirmed that the Council as the highway authority would seek to limit any use of the public highway where possible. This is a large site and it would be expected that all vehicles are contained within the site. Transport Officers will expect the updated CMP and Delivery and Servicing Plan to demonstrate that servicing for Phases 1 and 2 can be achieved whilst construction of the later phases are underway and this will be secured via condition. Officers would also expect the updated Service Management Plan to set out preferred delivery times that avoid the peak school start and finish times. It is acknowledged, however, that not all service vehicles could be controlled like this, such as couriers etc. LBTH Transport Officers would also be seeking to restrict service vehicles from waiting or parking on the public highway and this should be detailed in the updated Service Management Plan.

7.826 A finalised version of this document and other relevant construction-related technical documents such as an updated CMP will be secured via planning condition and the Council's Code of Construction Practice (CoCP) process to ensure that they consider the impact on pedestrians, cyclists and vehicles as well as fully considering the impact on other developments in close proximity. The condition will require the Applicant to submit a CoCP checklist alongside supporting documents including a Construction Management Plan, Construction Traffic Management Plan and a Site Environmental Management Plan (covering Noise and Vibration, Dust and Air Quality and Site Waste Management).

ENVIRONMENT

Environmental Impact Assessment

7.827 The planning application is an Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES) co-ordinated by Trium.

7.828 Regulation 3 prohibits the Council from granting planning permission without consideration of the *'environmental information'* that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the development.

7.829 The Council issued an EIA Scoping Opinion (PA/22/02317) on 21st December 2022. The submitted Environmental Statement (ES) accords with this Opinion and assesses the environmental impacts of the development under the following topics:

- Construction
- Climate Change
- Socio-Economics
- Health
- Traffic and Transport
- Air Quality
- Noise and Vibration
- Daylight, Sunlight, Overshadowing, Light Spill, Solar Glare and Solar Irradiance
- Pedestrian Wind Microclimate
- Sailing Microclimate
- Terrestrial Ecology
- Aquatic Ecology
- Geoenvironmental
- Water Resources Flood Risk and Drainage and
- Built Heritage;
- Townscape and Visual.

7.830 The ES has been reviewed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations).

7.831 The Council has appointed Temple Group Consulting to independently examine the ES, to prepare an Interim Review Report (IRR) and to confirm whether the ES satisfies the Regulations. This is supported by reviews by the Authority's internal environmental specialists. The IRR dated 21st March 2024 identified clarifications and potential *'further information'* required under Regulation 25. Clarifications and potential Regulation 25 *'further information'* requests were identified within the following topics:

- Site and Proposed Development
- Structure of the ES
- Climate Change
- Socio Economics
- Health
- Traffic and Transportation
- Air Quality
- Noise and Vibration
- Daylight and Sunlight
- Pedestrian Wind Microclimate
- Sailing Wind Microclimate
- Terrestrial Ecology
- Aquatic Ecology
- Geoenvironmental

- Water Resources and Flood Risk
- Built Heritage
- Townscape Visual Impact Assessment

7.832 On 17th April 2024, the Applicant submitted a response to the Interim Review Report which was reviewed by Temple and who issued the Final Review Report (FRR) on 10th May 2024. The FRR identified clarifications and potential *'further information'* required under Regulation 25. Clarifications and potential Regulation 25 *'further information'* requests were identified within the following topics:

- Site and Proposed Development
- Structure of the ES
- Climate Change
- Socio Economics
- Health
- Noise and Vibration
- Daylight and Sunlight
- Pedestrian Wind Microclimate
- Sailing Wind Microclimate
- Terrestrial Ecology
- Aquatic Ecology
- Geoenvironmental
- Water Resources
- Built Heritage

7.833 In response to the FRR, the Applicant submitted on the 17th May 2024 a Final Review Report Response together with an updated Non-Technical Summary (NTS), updated chapters 5 (Construction), 6 (Climate Change), 11 (Noise and Vibration), 12 (DSOLSSGSI), 14 (Terrestrial Ecology), 15 (Geoenvironmental), 17 (Effect Interaction) and 19 (Mitigation and Monitoring). In addition, appendices relating to chapters 11, 12, and 16 (Water Resources, Flood Risk and Drainage) were submitted. Subsequently a consultation under Regulation 25 of the EIA regulations commenced on 22nd May 2024.

7.834 The Applicant's response to the FRR was reviewed by Temple and a FRR002 (Final Review Report 002) was provided by Temple and issued to the Applicant on 4th June 2024. FRR002 identified that Clarifications and Potential Regulation 25 *'further information'* requests remained outstanding under the following topics:

- Structure of the ES
- Pedestrian Wind Microclimate
- Sailing Wind Microclimate
- Water Resources and Flood Risk

7.835 In response to FRR002, the Applicant submitted a final response with all outstanding Clarifications and Potential Regulation 25 requests addressed. A further amendment to the NTS was also submitted on 6th June 2024 and a second round of consultation under Regulation 25 of the EIA commenced on 10th June 2024 with the press notice being published on 13th June 2024.

7.836 On 1st July 2024, Temple issued FRR003 confirming that responses to outstanding Clarifications and Potential Regulation 25 *'further information'* requests were acceptable. Therefore, the Council's EIA Officer and the Council's Appointed EIA Consultants have confirmed that the submitted ES (including any subsequent ES submissions as set out above) meets the requirements of the EIA Regulations 2017.

7.837 The 'environmental information' has been fully examined by the Council and has been taken into consideration by Officers to reach a reasoned conclusion on the likely significant effects of the proposed development, which forms the basis of the assessment presented in this report.

Energy & Environmental Sustainability

Energy

7.838 At the national level, the NPPF directs the planning system to support the transition to a low carbon future in a changing climate. In this regard, the planning system should help to, amongst other things, shape places in ways that contribute to radical reductions in greenhouse gas emissions and support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.

7.839 At the strategic level, Chapter 9 of the London Plan requires development to contribute to mitigation and adapt to climate change. Specifically, Policy SI2 requires development proposals to make the fullest contribution to minimising carbon dioxide emissions and directs that major developments should be net zero-carbon. This means reducing greenhouse gas emissions and minimising energy demand in accordance with the following hierarchy:

1. Be Lean: Use Less Energy
2. Be Clean: Supply Energy Efficiently
3. Be Green: Use Renewable Energy
4. Be Seen: Monitor and Report

7.840 At the local level, the national and strategic policies are echoed in Policies S.ES1 and D.ES7 of the Local Plan. Policy D.ES7 specifically requires that for residential developments, zero carbon should be achieved through a minimum of 45% reduction in regulated carbon dioxide emissions on-site and the remaining regulated carbon dioxide emissions to 100% are to be off-set through a cash in-lieu contribution. Policy D.ES7 also requires that for the non-residential component, zero carbon should also be achieved through a minimum of 45% reduction in regulated carbon dioxide emissions with the remaining regulated carbon dioxide emissions to be off-set.

7.841 The application has been accompanied by an Energy Strategy prepared by AECOM. The Energy Strategy demonstrates that the scheme is anticipated to achieve an overall site-wide on-site reduction in carbon dioxide emissions of 71% over Part L[26] of the Building Regulations 2021. In terms of the domestic and non-domestic components of the scheme individually, the domestic component will achieve an on-site reduction in carbon dioxide emissions of 75% whilst the non-domestic component will achieve an on-site reduction of 23%.

7.842 Be Lean measures incorporated into the development include the orientation and layout of dwellings, high performance U-values for the building fabric, high levels of air tightness and high efficiency lighting and ventilation systems including heat recovery. All north-facing units within the scheme are dual aspect or 'enhanced single aspect' with pop-outs and stepped features on the building elevation to maximise access to daylight and sunlight. The opportunity to provide dual aspect dwellings has been maximised within the site, aiding cross ventilation and improving passive cooling. All dwellings are proposed to incorporate highly efficient mechanical ventilation systems with heat recovery (MVHR) to provide sufficient background air change rates. During the heating season, the MVHR will reduce space heating demand by recovering heat from the background ventilation exhaust air. To mitigate against overheating, cooling coils are integrated into the MVHR ducts in all units. The coils receive chilled water from the ambient loop through unit level water source heat pumps. The Energy Strategy also reports that 100% low energy fixed lighting is proposed within the dwellings and expresses a commitment to ensure the provision or purchase of energy efficient white goods.

7.843 In terms of the school and other non-residential components of the development, Be Lean measures will also include the provision of high performance U-values for the building fabric, high level of air tightness and high efficiency lighting and ventilation systems including heat recovery. The school building will be served by five HVAC systems (Heating Ventilation Air Conditioning): natural ventilation heating recycling units (NVHR), radiators with MVHR,

[26] The Building Regulations 2010 Approved Document L: Conservation of Fuel and Power

radiators with mechanical extract, fan coils and a constant volume system. The non-domestic commercial units within the scheme will be served by an Energy Centre which provides centralised ambient loop distributed to the different assets. The Energy Strategy reports that very low temperature water will be distributed around the site via a dedicated district network. The ambient loop system within the site will utilise heat pumps and an open loop system connecting to the dock, located adjacent to the site. The ambient loop can be used to provide both heating and cooling via locally installed water source heat pumps.

7.844 In terms of the 'Be Clean' component of the Mayor of London's Energy hierarchy, the proposed development is situated in proximity to the existing Barkantine District Heating Network (DHN) and there are no other proposed DHNs within the vicinity of the site. The Energy Assessment reports that Breath Energy, the operator of the DHN, have outlined that the heat-on date for the first phase of the proposed development is likely to be a few months before the agreement to operate the network expires. Given that a lengthy procurement process for a future operator is likely, there is currently uncertainty regarding the future of the Barkantine DHN.

7.845 The Energy Assessment also reports that it was confirmed by the Council's Energy Officer that, at present, the Barkantine DHN has no spare capacity for new connections and no immediate plans for expansion. As such an on-site solution with spatial provision and safeguarded routes provided to allow a connection to a DHN should this become viable is proposed. The development will utilise a site-wide loop heating and cooling network based on the Millwall Outer Dock as the primary source of energy. This will take heat and cool from the dock's water temperatures and will use Water Source Heat Pumps (WSHP) to elevate or lower the temperatures and deliver heating/cooling to the site. As such no carbon savings are reported from the 'Be Clean' stage of the energy hierarchy.

7.846 In terms of 'Be Green' measures, the Energy Assessment reports that the development will maximise the provision of roof-mounted Photovoltaic Panels (PV Panels) on all areas that are not to be utilised for roof top amenity, maintenance areas or are significantly overshaded. For the residential blocks it is estimated that an array of 820.8sqm is required and 880sqm for the school building.

7.847 The use of Water Source Heat Pumps sourcing water from the local dock as mentioned above is also a viable option for serving the space heating and domestic hot water demands. This is deemed more favourable than Air Sourced options due to more consistent source temperatures throughout the year. The Energy Assessment reports that initial site energy demands, and correspondence with the Canal and River Trust and the Environment Agency, demonstrated that using dock water to source heat for the development's space heating, cooling and hot water demands was a feasible approach. The Energy Centre will provide a centralised ambient loop distributed to the different assets including offices, school, retail, residential and residents' facilities. Very low temperature water will be distributed around the site via a dedicated district network. The ambient loop system within the site will utilise water source heat pumps and an open loop system connecting to the dock located adjacent to the site. The ambient loop will be used to provide both heating and cooling to the end users via locally installed water source heat pumps and water-cooled condensers for commercial space heating and cooling. Air Source Heat Pumps (ASHPs) will be provided on the roof of the central buildings to provided full back-up of the scheme's energy requirements in the event that the dock water is not available i.e. maintenance or environmental limitations. Each residential apartment will contain a reversable water source heat pump (WSHP) providing heating, cooling and domestic hot water within utility cupboards. The commercial units will be provided with capped-off pipework connections to the Energy Centre for the provision of heating, cooling and hot water.

7.848 The Energy Assessment reports that the scheme will also explore the feasibility of utilising waste heat from the cooling network of the data centre (situated at the eastern boundary of the site) at the detailed design stage.

7.849 Due to the phasing of the development, the secondary school may be required to have a temporary Energy Strategy which would be in place for a period of between 12 to 24 months, until completion of the Energy Centre and the installation of its associated plant. Temporary

ASHPs will be provided in lieu of the dock water source heat pumps that will eventually be installed within the Energy Centre.

7.850 Overall, whilst the proposed Energy Strategy does not strictly follow the order of the GLA's Energy hierarchy, the scheme as a whole with the domestic and non-domestic components combined exceeds Local Plan and national planning policies' requirement for the minimum on-site carbon dioxide emissions through the provision of passive efficiency measures, an ambient loop site-wide heat network which will be future-proofed for a future district heating network connection, and centralised dock WSHPs together with PV panels. The site-wide savings in on-site carbon emissions will equate to 71%. The domestic component of the Energy Strategy will exceed the Council's and the GLA's minimum target for on-site reduction in carbon dioxide emissions, however the non-domestic component in isolation will only achieve an on-site reduction in carbon dioxide emissions of 23%. Notwithstanding this however the Energy Strategy reports that current GLA 'Be Green' CO_2 emission targets are recognised to be challenging to pass under the updated Part L 2021 Building Regulations.

7.851 The Energy Strategy has been reviewed by the Council's Energy Officer and the GLA's Energy Team and both have accepted the Energy Strategy put forward for the development. The Applicant will also be submitting the 'Be Seen' reporting spreadsheet to the GLA to comply with the requirement to monitor, verify and report on the scheme's energy performance. The proposed development has the following regulated carbon profile after each step of the energy hierarchy:

- Baseline: 1262.4 tonnes CO_2 per annum
- Proposed Scheme: 362.7 tonnes CO_2 per annum

7.852 The proposal results in a carbon off-set contribution of £1,033,722 based on a rate of £95 per tonne over a 30-year period as identified in the London Plan. This contribution would be expected to be paid prior to the occupation of the development and secured via the S106 legal agreement should planning permission be granted for this development. Future connection to a district heating network will also be secured via the S106 agreement or a suitable condition.

Overheating

7.853 In terms of overheating and cooling, modelling of the residential component of the development has been undertaken in line with CIBSE (The Chartered Institution of Building Services Engineers) TM59 (Technical Memorandum) and Approved Document O[27] of the Building Regulations. In total 84 units covering different occupancies, orientations, aspect and locations were selected as a sample. The Energy Assessment reports that acoustic studies identified that during the night-time period, the majority of the blocks opening could only be partially opened to meet the acoustic criterion.

7.854 The overheating assessment has analysed the following conditions: Base Case (prior to design development), Option 1 (the development design without any site constraints) and Option 2 (with site acoustic constraints considered).

7.855 In the Option 1 scenario, the scheme was tested without any site constraints (any opening restrictions could be overridden and all the openings could be fully open when rooms were occupied). The Energy Assessment reports that testing of Option 1 indicated a full pass for all of the sample units under weather profile DSY1 (a moderately warm summer).

7.856 In the testing of Option 2, opening restrictions of approximately 100mm were applied to the openings at night to represent the partial openings, with the exception of the sliding doors which were fully closed at night. The assessment reports that when opening restrictions are applied to the units, the bedrooms in particular perform worse, due to the lack of natural ventilation to mitigate overheating. To mitigate against overheating, a proposed air tempering solution which utilises the ambient loop system is proposed. This enables cooling to be generated through an apartment heat pump unit whereby cooling is supplied by chilled water

[27] The Building Regulations 2010 Overheating (2021 edition).

to a cooling coil on the MVHR to temper the supply air into the apartments. The solution should be capable of generating up to 2-3kW of cooling per apartment and the air tempering to the spaces is proposed to be activated only to prevent the room environment exceeding the upper threshold of 26°C. The assessment reports that the manually activated tempering solution would meet the requirements of Part O of the Building Regulations and the CIBSE criterion for the DSY1 weather profile. The majority of the sample units tested also complied with the more extreme weather profiles of DSY2 (a year with a very intense single warm spell) and DSY3 (a year with a prolonged period of sustained warmth). The tempering solution proposed will be applied to residential units across the development.

7.857 In terms of the school building, the analysis of overheating has been divided into the three differently served areas within the school: the naturally ventilated spaces, the spaces served by Breathing Building NVHR (Natural Ventilation Heat Recovery) units and the mechanically controlled/cooled spaces. In terms of the naturally ventilated spaces, all rooms would comply with the TM52 (applicable to any type of building) criteria for DSY1. In terms of the spaces within the school that utilise the natural/hybrid strategy, the assessment reports that all rooms tested would comply with the criteria of BB101 – *Guidelines on ventilation, thermal comfort and indoor air quality in schools (August 2018).* Finally, in spaces within the school that include cooling systems (such as the Atrium), the assessment reports that the actual area-weighted average cooling demand (58.88 MJ/m2) is higher than the notional (32.88 MJ/m2) as is the total area-weighted cooling demand for the actual (99,118 MJ/m2) compared to the notional (55,358 MJ/m2) however the introduction of blinds could mitigate the excessive solar gains in the spaces with cooling, which can be investigated in the next stage of the design process.

7.858 For the remaining non-domestic components of the development which consist of the retail and commercial units and communal amenities spread across the development, the assessment reports that the actual area-weighted cooling demand is higher than the notional however these units are commercial units which will have a large amount of glazing for display reasons. The g-values proposed for the units have already been lowered to match the non-domestic notional building and as such the assessment reports that a balance needs to be had between the g-value and the amount of solar gain that enters the spaces.

BREEAM

7.859 Policy D.ES7 of the Local Plan also requires all new non-residential development over 500sqm floorspace to meet or exceed BREEAM 'Excellent' rating. The submitted Sustainability Statement accompanying the planning application confirms that BREEAM pre-assessments undertaken confirms that the school will achieve a BREEAM rating of 'Excellent'. The commercial units are all individually below 500sqm and thus will achieve a BREEAM rating of 'Very Good'. Target scores achieved in the pre-assessment are 72.97% for the school and 62.90% for the commercial units in the wider masterplan. The proposal therefore accords with development plan policy in this regard.

Circular Economy and Whole Life Carbon

7.860 The application has been accompanied by a detailed Circular Economy Statement that sets out key circular economy targets and commitments for the proposed development. These include as follows:

- Achieve the target of a minimum of 95% of demolition waste material diverted from landfill for reuse, recycling or recovery.
- Achieve the target of a minimum of 95% of excavation waste materials diverted from landfill for beneficial reuse.
- Achieve the target of a minimum of 95% construction waste materials diverted from landfill for reuse, recycling, or recovery.
- Achieve the target of a minim of 65% municipal waste recycling rate by 2030.
- Achieve the target of a minimum of 20% of the building material elements to be comprised of recycled or reused content.

7.861 The key commitments identified within the submitted Circular Economy Statement are considered acceptable and GLA Officers have confirmed following receipt of further clarifications that they are satisfied with the details submitted. GLA Officers have requested that a detailed Circular Economy Statement should be secured for each reserved matters application, however as this is a full detailed application it would be appropriate to secure this per phase. A condition will also be secured requiring the Applicant to submit a post-construction report. The scheme is therefore considered to be in accordance with Policy SI7 of the London Plan.

7.862 The Applicant has also submitted Whole Life-cycle Carbon (WLC) Assessments for the development in accordance with the GLA's requirements. The WLC Assessments report that the WLC performance of the proposed development (phases 0-4) improves upon the GLA's residential benchmark. For the school component, it confirms that the WLC performance exceeds the GLA's education benchmark. The GLA's Energy Officers have confirmed that the two GLA WLC templates submitted for review were mostly compliant with GLA policy subject to minor clarifications. GLA Officers have also requested a condition requiring the Applicant to submit a post-construction assessment to report the development's actual WLC emissions.

Home Quality Mark

7.863 Policy SD1 of the Isle of Dogs Neighbourhood Plan requires residential buildings to meet the Home Quality Mark standards. The application has not detailed how this shall be achieved. Officers will seek to impose a condition requiring the development to achieve an appropriate level of Home Quality Mark certification.

Summary and Securing the Proposals

7.864 It is considered that the proposals are in accordance with development plan policies for sustainability and CO_2 emission reductions and it is recommended that should planning permission be granted for this development, conditions require the following to be secured:

- Submission of a Zero Carbon Futureproofing Statement
- Submission of Circular Economy Statement per phase
- Submission of post-construction energy assessment including 'as-built' calculations to demonstrate the reductions in CO_2 emissions have been delivered on-site.
- Submission of post-construction assessment to report the actual WLC emissions.
- Implementation of the submitted Energy Strategy, including a minimum of 71% reduction in carbon emissions compared to baseline.
- BREEAM rating of 'Excellent' for the school and 'Very Good' for commercial units below 500sqm.

7.865 Overall, the Energy Strategy and sustainability measures incorporated into the development are considered to be broadly compliant with the London Plan and the Tower Hamlets Local Plan. Should planning permission be granted for this development, a carbon off-setting contribution of £1,033,722 would be required to deliver a policy-compliant net zero development and this would be secured via the S106 legal agreement.

Air Quality

7.866 Policy SI1 of the London Plan requires, amongst other things, that development proposals must be at least Air Quality Neutral. At the local level, Policy D.ES2 of the Local Plan requires development to meet or exceed the 'air quality neutral' standard.

7.867 The Air Quality Assessment comprises Chapter 10 of the Environmental Statement and has considered the potential for both the construction works and the operational component of the development to result in air quality effects. The assessment considers dust emissions from construction works, emissions from construction vehicles and construction works machinery during construction, as well as road traffic emissions once the proposed development is completed and operational. As the Barkantine Energy Centre (BEC) is sited within close

proximity of the development, the site's suitability in relation to the BEC flue has also been considered.

7.868 The site is within the borough-wide Air Quality Management Area (AQMQ) (an area identified due to the exceedance of the air quality objectives for annual mean and 1-hour mean NO_2 and 24-hour mean PM_{10} objectives). NO_2 refers to Nitrogen Oxide and PM_{10} is any particulate matter in the air with a diameter of 10 micrometres or less (i.e. smoke, dust, soot, salts, acids and metals).

Construction Traffic

7.869 In terms of the assessment of road traffic impacts on air quality during the construction phase of the development, the ES has considered the number of HGVs that will access the site for 2 construction years (2026 and 2028) within the overall construction programme. These years represent peak construction traffic flows for construction Phases 1-3, and Phase 4 and partial operation of the proposed development respectively, thus representing the worst-case scenario.

7.870 The ES reports that the number of vehicles that will access the site each day for the peak construction year for Phases 1-3 (2026) will be 248 daily vehicles, and the peak construction year for Phase 4 with partial operation of the proposed development (2028) will be 1,297 daily vehicles. In terms of predicted annual mean concentrations of NO_2 in 2026 and 2028 for existing receptors, these are set out in the table below for both the 'without construction' and 'with construction' scenarios and includes emissions from the BEC.

Predicted Impacts on Annual Mean NO_2 Concentrations during the Peak Construction of Phases 1-3 (2026) and Peak Construction of Phase 4 with Partial Operation (2028), including Emissions from the BEC (Existing Flue Layout) ($\mu g/m^3$)

Receptor	Peak Construction of Phases 1-3 (2026)				Peak Construction of Phase 4 with Partial Operation (2028)			
	Without Construction ($\mu g/m^3$)	With Construction ($\mu g/m^3$)	% Change *	Impact Descriptor	Without Construction ($\mu g/m^3$)	With Construction ($\mu g/m^3$)	% Change *	Impact Descriptor
E1	23.6	23.7	0	Negligible	23.2	23.4	0	Negligible
E2	24.6	24.8	0	Negligible	24.1	24.3	1	Negligible
E3	26.4	26.7	1	Negligible	25.6	25.9	1	Negligible
E4	26.8	27.1	1	Negligible	26.0	26.2	1	Negligible
E5	23.8	23.9	0	Negligible	23.3	23.4	0	Negligible
E6	23.6	23.8	0	Negligible	23.1	23.3	0	Negligible
E7	22.6	22.7	0	Negligible	22.2	22.4	0	Negligible
E8	24.9	25.0	0	Negligible	24.2	24.3	0	Negligible
E9	24.1	24.2	0	Negligible	23.5	23.6	0	Negligible
E10	22.9	23.1	1	Negligible	22.8	23.5	2	Negligible
E12	23.7	23.8	0	Negligible	23.5	24.1	1	Negligible
E13	23.5	23.6	0	Negligible	23.3	23.9	1	Negligible
E19	22.9	22.9	0	Negligible	22.5	22.6	0	Negligible
E20	25.7	25.7	0	Negligible	25.0	25.1	0	Negligible
E21	28.9	28.9	0	Negligible	27.7	28.0	1	Negligible
E22	26.6	26.6	0	Negligible	25.7	25.9	0	Negligible
E23	24.9	24.9	0	Negligible	24.2	24.5	1	Negligible
E24	23.1	23.1	0	Negligible	22.8	22.9	0	Negligible
Objective	40							

* % changes are relative to the objective and are rounded to the nearest whole number.

Table 11: Predicted NO_2 concentrations as presented in the Environmental Statement

7.871 The assessment reports that annual mean concentrations of NO_2 are below the objective at all receptor locations, with or without the proposed development in 2026 and 2028. Changes in concentrations are between zero and 1% in 2026 and zero and 2% in 2028. The ES assesses the impact to be Negligible (Not Significant) at all receptors.

7.872 In terms of predicted annual mean concentrations of PM_{10} in 2026 and 2028 for existing receptors, as demonstrated in the table below, these are predicted to be below the objective in both the with and without construction scenarios with changes in concentration being zero at all receptors in 2026 and 2028, thus the ES assesses the effects to be Negligible (Not Significant) in both years.

Predicted Impacts on Annual Mean PM_{10} Concentrations during the Peak Construction of Phases 1-3 (2026) and Peak Construction of Phase 4 with Partial Operation (2028) ($\mu g/m^3$)

Receptor	Peak Construction of Phases 1-3 (2026)				Peak Construction of Phase 4 with Partial Operation (2028)			
	Without Development ($\mu g/m^3$)	With Development ($\mu g/m^3$)	% Change [a]	Impact Descriptor	Without Development ($\mu g/m^3$)	With Development ($\mu g/m^3$)	% Change [a]	Impact Descriptor
E1	18.4	18.4	0	Negligible	18.4	18.4	0	Negligible
E2	18.5	18.6	0	Negligible	18.5	18.5	0	Negligible
E3	18.7	18.7	0	Negligible	18.7	18.7	0	Negligible
E4	18.7	18.8	0	Negligible	18.7	18.8	0	Negligible
E5	18.5	18.6	0	Negligible	18.5	18.6	0	Negligible
E6	18.5	18.6	0	Negligible	18.5	18.6	0	Negligible
E7	18.4	18.4	0	Negligible	18.4	18.4	0	Negligible
E8	18.6	18.6	0	Negligible	18.6	18.6	0	Negligible
E9	18.5	18.5	0	Negligible	18.5	18.5	0	Negligible
E10	18.0	18.1	0	Negligible	18.0	18.1	0	Negligible
E12	18.1	18.1	0	Negligible	18.1	18.2	0	Negligible
E13	18.1	18.1	0	Negligible	18.1	18.2	0	Negligible
E19	18.3	18.3	0	Negligible	18.3	18.3	0	Negligible
E20	18.7	18.7	0	Negligible	18.7	18.7	0	Negligible
E21	19.1	19.1	0	Negligible	19.1	19.1	0	Negligible
E22	19.0	19.0	0	Negligible	19.0	19.0	0	Negligible
E23	18.7	18.7	0	Negligible	18.7	18.7	0	Negligible
E24	18.3	18.3	0	Negligible	18.3	18.3	0	Negligible
Criterion	32 [b]		-	-	32 [b]		-	-

[a] % changes are relative to the objective and are rounded to the nearest whole number.
[b] While the annual mean PM_{10} objective is 40 $\mu g/m^3$, 32 $\mu g/m^3$ is the annual mean concentration above which an exceedance of the 24-hour mean PM_{10} objective is possible and is used as a proxy value for assessment.

Table 12: Predicted PM_{10} concentrations as presented in the Environmental Statement

7.873 In terms of concentrations of $PM_{2.5}$, the assessment reports that these are predicted to be below the objective with or without the proposed development at all receptors in 2026 and 2028. Changes in concentration are zero at all receptors compared to the assessment value of 20$\mu g/m^3$, with all impacts described as Negligible (Not Significant).

Completed Development

7.874 In the completed development scenario, the proposed development will lead to a change in AADT (Annual Average Daily Traffic) flows of more than 100 LDVs (Light Duty Vehicle) on a number of roads along the local road network. Annual mean concentrations of NO_2 in 2031 for existing receptors are well below the objective at all receptor locations, with or without the proposed development in 2031. Changes in concentration are between zero and 1% and the ES assesses the impact to be Negligible (Not Significant) at all receptors.

7.875 In terms of PM_{10} and $PM_{2.5}$ concentrations, these are predicted to be below the objective with or without the proposed development at all receptors in 2031. Changes in PM_{10} concentrations are zero at all receptors compared to the assessment value of 32µg/m^3, with all effects described as Negligible (Not Significant). Changes in $PM_{2.5}$ are also zero at all receptors compared to the assessment value of 20µg/m^3, with all impacts assessed as Negligible (Not Significant).

7.876 Overall, the operational phase effects of the proposed development are assessed to be Not Significant.

BEC NO_2 Impacts

7.877 The ES states that as the flues at the BEC emit NO_2 at an elevated height, there is potential to affect introduced receptors at heights above ground due to impaction of flue gases into the proposed development at height. The assessment of the existing BEC flue location with the proposed development buildings finds that there are 26 receptor locations at which the annual mean NO_2 objective is predicted to be exceeded in 2028 and 2031 and several others within 10% of the objective. In terms of the short term (1-hour mean) NO_2 objective, there are 83 modelled receptor locations at which the 1-hour mean NO_2 objective is predicted to be exceeded in 2028 and 2031.

7.878 The ES reports, however, that the extant planning permission contains a condition (condition 35 of planning permission PA/15/02216) requiring a further assessment of the impact of the emissions from the BEC and identification of any mitigation or remedial measures to be submitted for approval by the local planning authority. Given the uncertainty around the BEC, it is expected that a similar approach will be adopted for this application. In the event that the BEC flue is relocated, there are no modelled receptor locations at which the 1-hour mean NO_2 objective is predicted to be exceeded in 2028 and 2031. Once further details are known regarding the specific design and location of any replacement flue, a further assessment of the air quality impacts associated with that flue will be secured via condition as detailed above. It should also be noted, however, that as part of the contractual renewal of the BEC, there is potential to decarbonise the BEC by replacing the existing gas-fired CHP and boilers with zero-emission heat pumps. This would eliminate emissions of NO_2 from the BEC and ensure that there would be no exceedances of any objectives at the introduced receptors and subsequently negate the need for the flues to be relocated.

Mitigation Measures

7.879 Any construction mitigation measures will comply with the Council's Code of Construction Practice which will require the submission of documents such as the Construction Environmental Management & Logistics Plan and Dust Management Plan. In the completed development scenario, the assessment has demonstrated that the overall air quality effects of the proposed development will be Not Significant and as such no further mitigation measures are proposed.

Cumulative Scenario

7.880 In the cumulative scenario, predicted annual mean concentrations of NO_2 in 2026 and 2028 demonstrate that changes in concentrations are between zero and 1% in 2026 and zero and 2% in 2028. The impacts are Negligible at all receptors in 2026, with two Minor Adverse impacts in 2028. These two receptors have been modelled at 1.5m height and represent retail uses.

7.881 In terms of concentrations of PM_{10} emissions, these are predicted to be below the objective with or without the construction of the proposed development at all receptors in 2026 and 2028. Changes in concentrations are zero at all receptors in 2026 and 2028, with the exception of one receptor where the change is 1% in 2028. All impacts are described as Negligible (Not Significant) at all receptors in both years. The concentrations of $PM_{2.5}$ are predicted to be below the objective with or without the construction of the proposed development at all receptors in 2026 and 2028. Changes in concentrations are zero at all receptors with the impacts described as Negligible (Not Significant).

7.882 In the completed development cumulative scenario, the ES reports that annual mean concentrations of NO_2 are well below the objective at all receptor locations, with or without the proposed development in 2031. Changes in concentrations are between zero and 1% and the impacts are Negligible (Not Significant) at all receptors. Concentrations of PM_{10} are predicted to be below the objective with or without the proposed development at all receptors in 2031 with changes in concentration being zero at all receptors. Concentrations of $PM_{2.5}$ are predicted to be below the objective with or without the proposed development at all receptors in 2031 with changes in concentration being zero at all receptors. The effects of PM_{10} and $PM_{2.5}$ concentrations in 2031 are therefore assessed as Negligible (Not Significant).

Summary

7.883 Overall, the assessment reports that the construction works have the potential to create dust and effects of emissions from construction vehicles on local air quality. However, residential effects have been identified as being Negligible (Not Significant) in all scenarios. Similarly, in the operational phase of the development the air quality effects of the proposed development on existing sensitive receptors will be Not Significant. The assessment also confirms that the scheme will be air quality neutral from both building and transport emissions. The ES has been reviewed by Temple and the Council's Air Quality Officer and subject to clarifications and the imposition of conditions to secure the management of dust, PM_{10} monitoring, details of any extraction systems for commercial uses and details of all plants and machinery, the scheme is considered to be compliant with relevant development plan policies.

Wind/Microclimate

7.884 Policies D3, D8 and D9 of the London Plan requires developments, particularly those with tall buildings, to be considerate of microclimate impacts associated with their scale and mass. Similarly, Local Plan Policies S.DH1 and D.DH6 seek to ensure that new developments do not adversely impact on the microclimate and amenity of the application site and the surrounding area. Policy D.OWS4 of the Local Plan states that development within or adjacent to the borough's water spaces is required to demonstrate that, amongst other things, it does not have an adverse impact on other existing active water uses.

7.885 Chapter 13a (Pedestrian Wind Microclimate) and 13b (Sailing Wind Microclimate) of the Environmental Statement reports the findings of the wind and microclimate study. The pedestrian wind microclimate assessment is based on worst-case wind speeds, expected to be encountered during the winter seasons (December-February) in the UK. Additional consideration has been given to summer (June- August) wind conditions due to the presence of ground floor and above ground amenity spaces within the proposal.

Pedestrian Wind Microclimate

7.886 Wind microclimate conditions have been assessed at various on-site street and elevated level locations such as: pedestrian throughfares, entrances and amenity areas such as ground floor, podiums, balconies and roof terraces. Off-site locations include all receptors falling outside of the boundary of the site, such as users of roads, bus stops, surrounding building entrances, and amenity areas at ground level and elevated levels. The assessment of wind comfort and safety is based on the City of London (CoL) Lawson Comfort Criteria, an industry-standard practice for wind microclimate assessments which sets wind speeds and frequency ranges for pedestrian comfort and safety. Pedestrian activities assessed are namely sitting, standing, strolling and walking. Under this assessment method if the measured wind conditions exceed the threshold for more than 5% of the time, then they are unacceptable for the stated pedestrian activity.

7.887 The ES reports that wind microclimate across the site was tested for 6 configurations as follows:

Configuration 1: The existing site with existing surrounding buildings (the baseline condition).

Configuration 2: The proposed development with existing surrounding buildings.

Configuration 3: The proposed development with proposed landscaping, wind mitigation measures and existing surrounding buildings.

Configuration 4: The proposed development with cumulative surrounding buildings.

Configuration 5: The proposed development with proposed landscaping, wind mitigation measures and cumulative surrounding buildings.

Configuration 6: The phased scenario (school with phase 1 and 2) with existing surrounding baseline.

7.888 It should be noted that configurations that include cumulative surrounding buildings only include those developments located within 360m of the site for the purposes of the wind microclimate assessment as these are the only schemes[28] from the full list of the cumulative developments listed in the ES that would potentially meaningfully impact upon the wind microclimate of the proposed development.

7.889 The assessment reports that based on configuration 1 (baseline scenario), it would be expected that conditions during enabling works would be suitable for a working construction site and pedestrian thoroughfares around the site (with the hoarding in place). The likely effect is expected to be Negligible (Not Significant) with no specific wind mitigation measures required.

7.890 In the interim scenario (Configuration 6) with the school and Phases 1 and 2 constructed which would result in a mid-construction environment, the ES reports that the effects of the construction buildings in these phases would be similar to those around the same buildings in the completed development scenario, with the addition of the following Minor Adverse (Significant) effects to the following:

- Entrances on the south sides of Building N2 (measurement location 185) and N3 (measurement location 122) which would have walking conditions[29] during the windiest season;
- Ground level amenity seating areas at measurement locations 105, 141, 142, 156, 184, 298 and 299, which would have strolling conditions during the summer season; and
- Balconies on Buildings C2 and T3 (measurement locations 439, 440 and 450) which would have walking conditions during the summer.

7.891 The above additional effects would be temporary until the remaining phases are constructed. All other wind effects during this scenario would be the same as or better than those in the completed development scenario for the respective buildings and there would be no instances of strong winds in this configuration. As such the ES reports that landscaping and mitigation will be implemented together with their respective buildings to ensure that potential adverse effects are mitigated at the time when buildings are occupied.

7.892 The remaining configurations with the completed development are considered further below:

Configuration 2:

7.893 Pedestrian Comfort: The ES reports that the proposed development would increase the wind conditions on-site within the passageways between the buildings of the proposed development as the prevailing south-westerly wind would channel between the plots and around the south-eastern corners as the down-washing winds would accelerate around these corners. Wind conditions at and around the proposed development would be suitable for frequent sitting with conditions uncomfortable for pedestrian use during the windiest season. Wind conditions during the summer season would generally be one category calmer, being suitable for frequent sitting to walking use and strolling use.

[28] PA/23/01395 and PA/16/03518 – 49-59 Millharbour, 2-4 Muirfield Crescent and 23-29 Pepper Street and PA/10/01177 – Glengall Bridge, 1-1 Muirfield Crescent and 47 Millharbour.
[29] "walking conditions" refer to the walking wind comfort category which means that the locations specified would have a walking category condition of 8m/s during the windiest season.

7.894 Thoroughfares (Windiest Season): The majority of on-site throughfares would be suitable for frequent sitting to walking use during the windiest season and suitable for the intended use. The ES reports that this would result in Major Beneficial (Not Significant) to Negligible (Not Significant) effects. Wind conditions uncomfortable for pedestrian use (measurement locations 290, 291, 293 and 308) would represent a Minor Adverse (Significant) effect and would require wind mitigation measures. In terms of off-site thoroughfares, wind conditions would be suitable for frequent sitting to walking use during the windiest season and would be suitable for their intended use. As such the assessment reports that this would result in Negligible (Not Significant) effects.

7.895 Entrances (Windiest Season): The majority of on-site entrances to the proposed development are reported to be suitable for frequent sitting to standing use during the windiest season and suitable for the intended use and as such the ES reports the effects to be Moderate Beneficial (Not Significant) to Negligible (Not Significant). Entrances to tower T2 (measurement location 136) and tower T3 (measurement location 198) on the western facades would have walking conditions during the windiest season, which would be one category windier than suitable for the entrance use. This would represent a Minor Adverse (Significant) effect and would require mitigation measures. In terms of off-site entrances, wind conditions at these locations would be suitable for frequent sitting use during the windiest season and provide suitable conditions for the intended use. The ES reports that this would represent a Negligible (Not Significant) effect.

7.896 Bus Stops (Windiest Season): The bus stops along Westferry Road would be suitable for standing use during the windiest season. This would be one category windier than the baseline scenario but would remain suitable for the intended use. This would represent a Negligible (Not Significant) effect.

7.897 Ground Level Amenity – Mixed Use (Summer Season): The assessment reports that on-site ground level mixed use amenity spaces would have wind conditions suitable for occasional sitting to standing use conditions during the summer season. Standing conditions on play areas represented by measurement locations 118 and 282 would be acceptable as fixed seating is not proposed within these play spaces and as such the ES reports that this would represent a Negligible (Not Significant) effect.

7.898 In terms of off-site amenity spaces, these would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season and would be suitable for the intended use. These conditions would be similar or calmer than configuration 1 and would represent a Negligible (Not Significant) effect.

7.899 Ground Level Amenity – Seating (Summer Season): The assessment reports that the majority of the proposed seating provisions would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season and suitable for the intended use. This would represent a Negligible (Not Significant) effect.

7.900 The assessment reports that standing (measurement locations 47,79, 129, 137, 155, 210, 217, 285, 314 and 316) and walking (measurement locations 199 and 318) conditions on the proposed seating provisions would be up to two categories winder than suitable for the intended use. This would represent Minor Adverse (Significant) and Moderate Adverse (Significant) effects respectively and would require wind mitigation measures.

7.901 Podium Level Amenity (Summer Season): On-site podium amenity spaces would be suitable for occasional sitting and standing use during the summer season and would provide suitable conditions for mixed-use amenity spaces where fixed seating provisions are not proposed. The ES reports that this would represent a Negligible (Not Significant) effect.

7.902 Terrace Amenity (Summer Season): On-site terrace amenity spaces would have wind conditions suitable for occasional sitting use during the summer season and suitable conditions for mixed use amenity, representing a Negligible (Not Significant) effect. Off-site terrace amenity spaces would be suitable for occasional sitting use during the summer season and would represent a Negligible (Not Significant) effect.

7.903 Balconies (Summer Season): The majority of on-site balcony amenity spaces throughout the proposed development would have wind conditions suitable for frequent sitting to standing use during the summer season. As these balconies are private amenity spaces without fixed seating provisions proposed, where the user has control over the useability of these spaces, these conditions would be suitable for the intended private amenity use. This would represent a Negligible (Not Significant) effect.

7.904 Balconies at the north-west corner of building C2 (measurement location 424), the 15 uppermost balconies at the south-east corner of tower T3 (measurement location 451), balconies at the north-west corner of tower T4 (measurement location 456) and the balconies at the south-east corner of tower T4 (measurement locations 460 and 461) would have wind conditions suitable for walking use during the summer season. This would be one category windier than suitable for the intended use and would represent a Minor Adverse (Significant) effect and would require wind mitigation measures.

7.905 In terms of off-site balconies, the assessment reports that balconies on Tiller Road and 2 Old Bellgate would be suitable for frequent sitting and standing use during the summer season. These conditions would be similar to or calmer than configuration 1 and would represent a Negligible (Not Significant) effect.

7.906 Strong Winds: The ES reports that there would be two instances of strong wind exceedances at balconies on tower T4 (measurement locations 456 and 461 as identified in the image below) as these are exposed to the prevailing south-westerly winds. This would represent a Major Adverse (Significant) effect and would require wind mitigation measures. There would be no winds exceeding the safety threshold occurring at off-site locations.

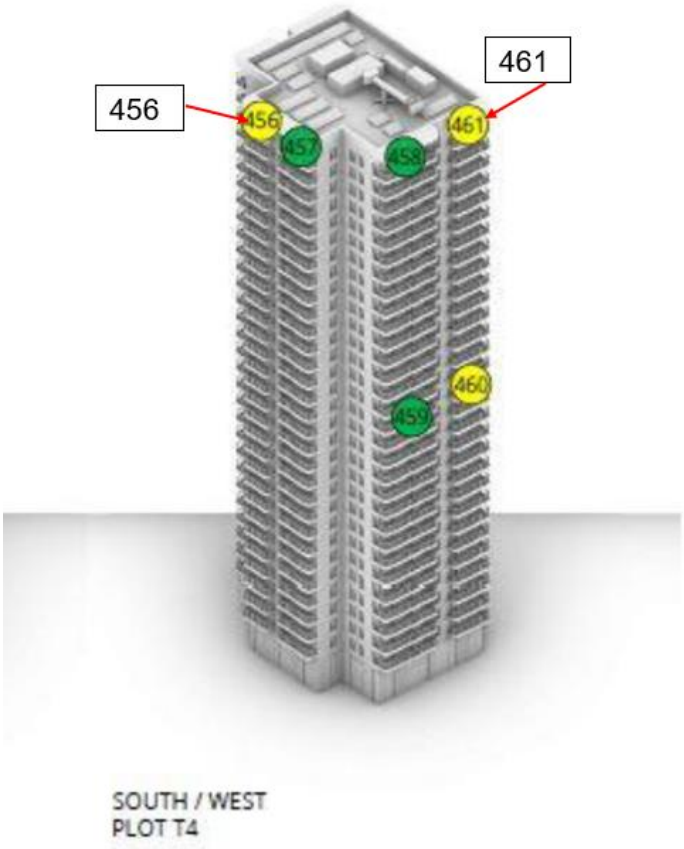


Figure 73: Measurement Locations 456 and 461 on tower T4

Configuration 3:

7.907 Pedestrian Comfort: In the configuration with the proposed development with proposed landscaping and wind mitigation measures in place, wind conditions on the thoroughfares, entrances, ground level mixed amenity spaces, majority of the ground level seating provisions, podium and the terrace mixed use amenity spaces and the balconies of the proposed development would remain suitable for the intended use. This would represent Major Beneficial (Not Significant) to Negligible (Not Significant) effects.

7.908 As per configuration 2, wind conditions at off-site throughfares, entrances, amenity spaces and bus stops would have wind conditions suitable for the intended use or consistent with configuration 1. This would represent a Negligible (Not Significant) effect.

7.909 On-Site Entrances: With the inclusion of the proposed landscaping and wind mitigation measures, the majority of the on-site entrances would have wind conditions suitable for the intended use. The assessment reports that the entrance to tower T3 (measurement location 198) was assessed with a 1m-long 2m-high solid side screen which would provide some beneficial shelter. However, the walking conditions would be one category windier then suitable for the intended use. The entrance would be recessed however by 0.5m and this recess together with the high screen next to the entrance would be expected to have wind conditions suitable for the intended use, representing a Negligible (Not Significant) effect.

7.910 On-Site Seating Provisions: The ES reports that with the inclusion of the proposed landscaping scheme, the majority of the seating provisions would have wind conditions suitable for the intended use during the summer season. However, the proposed seating provisions at measurement locations 79, 137, 153, 210 and 217 would have wind conditions suitable for standing use during the summer season, which would represent a Minor Adverse (Significant) effect. The assessment therefore recommends relocating these seating spaces to the nearby areas with conditions suitable for occasional sitting use during the summer season. Alternatively, the inclusion of 1.5m high shrub planting behind these seating provisions would provide beneficial localised shelter and with these measures in place the seating provisions would be expected to have wind conditions suitable for the intended use, representing a Negligible (Not Significant) effect.

7.911 Strong Winds: The ES reports that with the inclusion of wind mitigation measures, strong winds exceeding the safety threshold would not occur at and around the proposed development.

Configuration 4: Cumulative Effects Assessment

7.912 Pedestrian Comfort: The two cumulative schemes are located north-east of the proposed development. The assessment reports that inclusion of these taller schemes would be beneficial to reduce the windiness on the eastern side of the proposed development site as the massing of these taller buildings would reduce the acceleration of the approaching winds. Wind conditions at and around the proposed development would be suitable for frequent sitting with conditions uncomfortable for pedestrian use during the windiest season. Wind conditions during the summer season would generally be one category calmer, being suitable for frequent sitting to walking and strolling use.

7.913 Thoroughfares (Windiest Season): The majority of on-site throughfares would be suitable for frequent sitting to walking use during the windiest season and suitable for the intended use. This would represent Major Beneficial (Not Significant) to Negligible (Not Significant) effects. Wind conditions uncomfortable for pedestrian use (measurement location 291) would represent a Minor Adverse (Significant) effect and would require wind mitigation measures.

7.914 In terms of off-site thoroughfares, these would have wind conditions suitable for frequent sitting to walking use during the windiest season and provide suitable conditions for the intended use. This would represent a Negligible (Not Significant) effect.

7.915 Entrances (Windiest Season): The majority of the entrances to the proposed development would be suitable for frequent sitting to standing use during the windiest season, and suitable for the intended use. This would represent Moderate Beneficial (Not Significant) to Negligible

(Not Significant) effects. The entrances to tower T2 (measurement location 136) and tower T3 (measurement location 198) on the western facades would have walking conditions during the windiest season which would be one category winder than suitable for the entrance use. This would represent a Minor Adverse (Significant) effect and would require wind mitigation measures.

7.916 In terms of off-site entrances, window conditions would be suitable for occasional sitting use during the windiest season and suitable for the intended use. This would represent a Negligible (Not Significant) effect.

7.917 Bus Stops (Windiest Season): The assessment reports that the bus stops along Westferry Road would be suitable for occasional sitting use during the windiest season and provide suitable conditions for the intended use. This would represent a Negligible (Not Significant) effect.

7.918 Ground Level Amenity – Mixed Use (Summer Season): The ground level mixed-use amenity spaces would have wind conditions suitable for occasional sitting to standing use conditions during the summer season. Standing conditions on play areas represented by measurement locations 41, 118 and 282 would be acceptable as fixed seating is not proposed within these play spaces. This would represent a Negligible (Not Significant) effect.

7.919 In terms of off-site amenity spaces, these would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season and be suitable for the intended use. The assessment reports that these conditions would be similar or calmer than configuration 1 and would represent a Negligible (Not Significant) effect.

7.920 Ground Level Amenity – Seating (Summer Season): The majority of on-site seating provisions would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season and provide suitable conditions for the intended use, representing a Negligible (Not Significant) effect. Standing (measurement locations 47, 79, 129, 137, 153, 155, 210, 217, 285 and 316) and walking (measuring location 199) conditions on the proposed seating provisions would be up to two categories winder than suitable for the intended use. This would represent Minor Adverse (Significant) and Moderate Adverse (Significant) effects respectively and would require wind mitigation measures.

7.921 Podium Level Amenity (Summer Season): The on-site podium level amenity spaces would be suitable for occasional sitting and standing use during the summer season and provide suitable conditions for a mixed use amenity space where fixed seating provision is not proposed. This would represent a Negligible (Not Significant) effect.

7.922 Terrace Amenity (Summer Season): The on-site terrace amenity spaces would have wind conditions suitable for occasional sitting use during the summer season and provide suitable conditions for mixed-use amenity and would represent a Negligible (Not Significant) effect. In terms of off-site terrace amenity, amenity spaces on Tiller Road and 2 Old Bellgate would be suitable for occasional sitting use during the summer season and would represent a Negligible (Not Significant) effect.

7.923 Balconies (Summer Season): The majority of the balcony amenity spaces would have wind conditions suitable for frequent sitting to standing use during the summer season and suitable for the intended use. The assessment reports that this would represent a Negligible (Not Significant) effect. Balconies at the north-west corner of building C2 (measurement location 424), the 15 uppermost balconies at the south-east corner of tower T3 (measurement location 451), balconies at the north-west corner of tower T4 (measurement location 456) and the balconies at the south-east corner of tower T4 (measurement locations 460 and 461) would have wind conditions suitable for walking use during the summer season. This would be one category windier than suitable for the intended use and would represent a Moderate Adverse (Significant) effect and would require wind mitigation measures.

7.924 In terms of off-site balcony locations, these would be suitable for frequent sitting and standing use during the summer season. These conditions would be similar or calmer than configuration 1 and would represent a Negligible (Not Significant) effect.

7.925 Strong Winds: The assessment reports that with the inclusion of the cumulative schemes, there would be one instance of strong wind exceedances at the column of balconies at the north-west corner of tower T4 (measurement location 456) as these are exposed to the prevailing south-westerly winds. This would represent a Major Adverse (Significant) effect and would require wind mitigation measures. In term of off-site locations, strong winds exceeding the safety threshold would not occur at off-site locations.

Wind Mitigation Measures

7.926 In summary the following areas of the development in the completed development configuration would require wind mitigation measures to improve wind conditions so that they would be suitable for the intended pedestrian/occupant uses:

- On-site thoroughfares with conditions uncomfortable for pedestrian use during the windiest season (measurement locations 290, 291, 293, 294 and 308);
- Entrance to tower T2 (measurement location 136) and tower T2 (measurement location 136) and tower T3 (measurement location 198) with walking conditions during the windiest season;
- Ground level proposed seating provisions with standing (measurement locations 47, 79, 129, 137, 153, 155, 210, 217, 285, 314 and 316) and walking (measurement locations 199 and 318) conditions during the summer season;
- Balcony amenity spaces (measurement locations 424, 451 and 460) with walking conditions during the summer season; and
- Balcony amenity spaces (measurement locations 456 and 461) with walking conditions during the summer season and strong wind exceedances.

7.927 During the construction stage of the development, areas under construction are expected to be surrounded by hoarding until the point at which the landscaping measures have been incorporated and the relevant buildings become occupied, which would provide some shelter to the site. The landscaping (trees and planters) tested within the wind tunnel and the mitigation measures proposed would need to be put in place prior to the completion and occupation of the respective phases of the proposed development to ensure that the conditions at the site are suitable for their intended pedestrian uses.

7.928 The ES identifies that the proposed on-site wind mitigation measures shall include the following:

- The proposed landscaping scheme as identified on drawing number WFP-LDA-ZZ-00-DR-L-0100 prepared by LDA Design;
- Five x 5m high deciduous trees to the northwest tower T4 (in the vicinity of measurement locations 290, 291, 293 and 294);
- 1.5m-high 3m-long shrub planting to the northwest of the tower of T4 (as above);
- 1.5m-high 2m-long 50% porous screen at the southeast corner of tower T4 (in the vicinity of measurement location 308);
- 1.5m-high shrub planting added to the planter to the west of the entrance to tower T2 (represented by measurement location 136);
- 2m-high, 1m-long screen between the entrances to tower T2 on the western façade (measurement location 136);
- 2m-high, 1m-long screen between the entrances to tower T3 on the western façade (measurement location 198), in addition to the entrances at this location being recessed by 0.5m.

- Full height 50% porous side screen on the northern side of the balconies at the northwest corner of tower T4 (measurement location 456);
- 1.5m-high 50% porous balustrade on the western and southern sides of the tower T4 balconies on levels 1-15;
- Full height, 50% porous side screen on the eastern side of the 15 uppermost balconies at the southeast corner of tower T4 (measurement location 461);
- 1.5m-high, 50% porous balustrade along the perimeter of the levels 1-15 balconies at the southeast corner of tower T4 (measurement location 460);
- 1.5m-high, 50% porous balustrade along the perimeter of the four uppermost balconies at the northwest corner of building C2 (measurement location 424) and the southwest corner of building C3 (measurement location 440).
- 1.5m-high, 50% porous balustrade along the perimeter of the thirteen uppermost balconies at the southeast corner of tower T3 (measurement location 451);
- Removing the easternmost tree and the planter underneath the trees between building C1 and tower T2 (measurement location 138); and
- Moving the proposed 70% porous screen closer to the southeast boundary of the site.

7.929 With the above mitigation measures incorporated the majority of measurement locations identified for concern would be safe and suitable for the intended use. The ES has been reviewed by Temple Group who with the exception of some clarifications sought, have found the wind/microclimate assessment to be acceptable.

Sailing Microclimate

7.930 To assess the wind impacts of the proposed development on the dock, during the scoping process for the extant consent a site-specific set of criteria applicable to novice and inexperienced sailors was developed in agreement with the Council, the Greater London Authority and the Docklands Sailing and Watersports Centre (DSWC). This approach was considered to be acceptable under the Scoping Opinion undertaken prior to the submission of the planning application. This was done as there are no regulatory parameters or published guidelines that exist to assess the sailing quality of a particular location across a range of wind speeds, direction and duration of time.

7.931 Wind tunnel tests on a 1:300 scale model was undertaken with the mean and peak wind speeds measured at 48 probe locations throughout the dock on a grid at a height representing 2.4 metres above the water surface, for a range of wind directions. The height is representative of the centre of the sail plan of a dinghy typical of those sailed at the site. Wind tunnel testing with the use of Wu Tubes (a pressure device that precisely measures wind speeds and directions) provides a detailed assessment of the mean wind speeds and directions at measurement locations over the dock for 36 wind directions, in 10° increments. Downdraughts have not been considered in the assessment as they typically only occur directly adjacent to tall buildings and the dock edge is considered to be at a sufficient distance from the buildings so that there will not be any direct impact of downdraughts on the dock or sailing activity.

7.932 The ES reports that the following scenarios were tested in the wind tunnel:

- C1: Existing Cleared Site with Existing Site Surrounding Buildings, used as the main Baseline reference;
- C2: Proposed Development with Existing Surrounding Buildings;

- C3: Proposed Development with Cumulative[30] Surrounding Buildings; and
- C4: The Phased Construction Scenario (School with Phase 1 and 2) with Existing Surrounding Baseline.

7.933 The objective of the sailing analysis is to predict the effects that the proposed development will have on the ability to sail in the Millwall Outer Dock during the operational stage (i.e. with the proposed development built out in full) as this represents the permanent, long term condition of the site and the intermediate phasing condition scenario. Particular attention has been paid to wind speed characteristics that would affect novice sailors as they are particularly sensitive to changes in wind speed and direction, as they would not yet have developed the skills to predict, sense and adjust to local changes (in time and location), that would be expected of a more experienced sailor.

7.934 The sailing analysis has been carried out using the following criteria/thresholds for 'good' sailing quality:

- Wind speed limits between 3-9 knots for novice sailors: this wind speed limit would provide controllable sailing without a novice being excessively overpowered;
- Change of wind speed between adjacent locations of no greater than 30% - i.e. a wind speed change of 30% between probe locations that are within 40 metres of each other or the nearest adjacent probe location for those with greater spacing. This would be the maximum wind speed change that could be accommodated by a novice sailor;
- Change of wind direction of no greater than 20 degrees between adjacent points; and
- A direction change of 20 degrees or more between probe locations within 40m of each other or the nearest adjacent location for those with greater spacing. This would be the maximum angle change that could be accommodated by a novice sailor.

7.935 The above criteria have been applied to each probe to predict the percentage of time with 'good' sailing conditions, averaged over the typical sailing season for DSWC (between March and November inclusive).

7.936 The table below extracted from the ES indicates the receptors and the associated activity and area of the dock in which they occur.

Receptor Type	Activity	Area
Dock Users		
Novice Dinghy Sailors	Launching and recovery of craft	Western Dock End
Novice Dinghy Sailors	Sailing	Entire Dock
Experienced Dinghy Sailors	Launching and recovery of craft	Western Dock End
Experienced Dinghy Sailors	Sailing	Entire Dock

Table 13: Receptors and Receptor Sensitivity

7.937 In terms of defining the scale and nature of effect, the assessment of the likely scale of effect has been based on the comparison of the predicted sailing quality conditions at a particular measurement location. The ES describes that the nature of the effect can either be adverse, beneficial or negligible. Where Adverse effect occurs, lower sailing quality conditions would be experienced. Beneficial effect refers to conditions that are of higher sailing quality then the existing site whereas where Negligible effects have been assessed, sailing quality conditions

[30] PA/16/03518/A3 – 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street, London, E14.

are not materially changed by the proposed development. The table below extracted from the ES sets out the expected sailing quality against the scale of effects. If the level of sailing quality change compared to the baseline is greater than 15% then this is deemed to be a Significant effect and this would be applicable in either an increase or decrease in sailing quality percentage in excess of 15%. The ES reports however that where the 15% threshold relates to a reduction in the time the conditions are not met, this does not necessarily preclude the ability to sail.

Expected Sailing Quality	Scale and Nature of Effect
Sailing quality percentage point difference is an increase in excess of 15% for entire dock	Major Beneficial
Sailing quality percentage point difference is an increase of 10 - 15 % for entire dock, or in designated zone (i.e. Western or Eastern Dock)	Moderate Beneficial
Sailing quality percentage point difference is an increase of 10 - 15 % in designated zone (i.e. Western or Eastern Dock)	
Sailing quality percentage point difference is an increase of 5 – 10 % for entire dock, or for an individual measurement location(s)	Minor Beneficial
Sailing quality percentage point difference is an increase of 5 – 10 % for an individual measurement location(s)	
Sailing quality percentage point difference for all measurement locations less than 15 %	Negligible
Sailing quality percentage point difference is a reduction in excess of 15 % for an individual measurement location(s)	Minor Adverse
Sailing quality percentage point difference is a reduction of 5 – 10 % points for entire dock	
Sailing quality percentage point difference is a reduction in excess of 15 % for designated zone, i.e. Western or Eastern Dock	Moderate Adverse
Sailing quality percentage point difference is a reduction of 10 - 15 % points for entire dock	
Sailing quality percentage point difference is a reduction in excess of 15 % points for entire dock	Major Adverse

Table 14: Scale and Nature of Effect

Baseline Scenario C1:

7.938 In the baseline existing site scenario, the prevailing winds are from the south-west, with a secondary peak of north easterly winds common during the spring season. The prevailing south-westerly winds interact with the existing buildings on the southern side of the Millwall Outer Dock. For south-westerly winds, this results in lower wind speeds to the south as these areas are sheltered by the massing of the buildings to the south creating a zone of lower wind speed conditions. The westerly winds are less affected by the existing buildings resulting in more uniform wind speeds across the dock from west to east. The north-easterly winds generally flow unobstructed across the majority of the dock area tested before interacting with the existing buildings south of the dock, which reduces wind speeds in this area.

7.939 The image below extracted from the ES shows the sailing quality results for the baseline scenario. The green highlights areas where sailing quality is either unaffected or improved; orange indicates a drop in sailing quality, but within the predetermined parameter of acceptability; and red indicates a deterioration of sailing quality equal to or in excess of the pre-determined parameter for acceptability (>15% adverse change). The numbers in the dock area reflect the probe locations assessed.

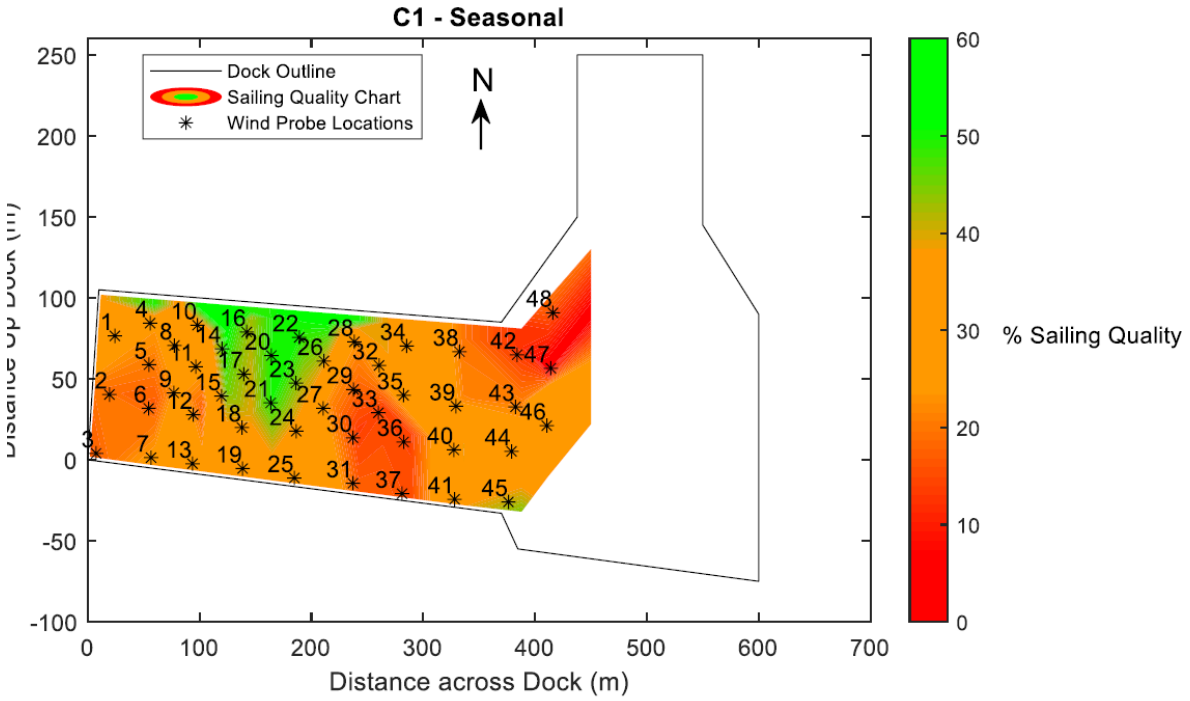


Figure 74: Configuration C1 – Baseline Sailing Season Sailing Quality

7.940 In the baseline scenario, the sailing quality conditions when averaged across the entire dock area show that 32% of time the dock has good sailing quality. This translates to an average of 9.6 days per month and a maximum of 17.1 days per month with good sailing quality across the entire dock. The assessment also reports that the results vary across the dock and that the northern central area of the dock has the best conditions with percentages in excess of 40% of the time with good sailing quality (areas identified in green). The best condition achieved is 57% of the time with good sailing quality, located to the north of the dock (probe location 22). The remainder of the dock area exhibits a lower sailing quality percentage due to the proximity to existing buildings around the dock impacting the flow conditions. The area with the worst sailing conditions is the north-eastern corner of the dock and around probe location 47 which achieves only 5.0% of the time with good sailing quality.

7.941 In terms of the western end of the dock (probe locations 1 to 25), in comparison to the wider dock area, has a better average wind condition with 36.7% of the time with good sailing quality, compared to 32.0% of the time with good sailing quality respectively. The western area of the dock is used for launching and recovering the dinghies on the existing pontoon facilities by novice sailors. Probe locations 2,3 and 6 in the southwestern corner of the dock and closest to the sailing centre has the lowest amount of time with good sailing quality.

7.942 The assessment summarises that in the baseline scenario, the existing sailing conditions on the dock vary by location. The northern central region of the dock has the highest percentage of time with good sailing quality, which includes part of the western end of the dock which is mainly used by novice sailors. Areas in south central and north-east result in the lowest percentage of time with good quality sailing conditions however the assessment reports that these lie outside of the area used most often by novice sailors for launching and recovering the dinghies on the existing pontoon facilities.

Sailing Quality Results

7.943 Table 15 below extracted from the ES summarises the percentage (%) sailing quality results across all 4 configurations, averaged over the entire dock measurement area, the average for the western end of Millwall Outer Dock (probe locations 1 to 25) and the eastern end (probe locations 26-48). The table also includes the minimum and maximum sailing quality range for an individual probe location.

Location	Threshold	Configuration 1: Existing Site	Configuration 2: Proposed Development	Configuration 3: Proposed Development with Cumulatives	Configuration 4: Phased Condition
Entire Dock	Average	32.0	22.4	22.6	23.0
	Minimum	5.0	6.3	6.0	7.1
	Maximum	57.0	52.1	51.3	38.2
Western Dock (Points 1 – 25)	Average	36.7	20.0	20.2	19.0
	Minimum	17.1	7.6	7.7	7.1
	Maximum	57.0	32.6	32.8	38.2
Eastern Dock (Points 26 – 48)	Average	26.9	24.9	25.2	27.3
	Minimum	5.0	6.3	6.0	19.8
	Maximum	51.7	52.1	51.3	37.3

Table 15: Sailing Season Average, Minimum and Maximum % Sailing Quality Values

7.944 The above is also simplified in the table below into the equivalent number of days per month with good sailing quality.

Location	Threshold	Configuration 1: Existing Site	Configuration 2: Proposed Development	Configuration 3: Proposed Development with Cumulatives	Configuration 4: Phased Condition
Entire Dock	Average	9.6	6.7	6.8	6.9
	Minimum (per point)	1.5	1.9	1.8	2.1
	Maximum (per point)	17.1	15.6	15.4	11.5
Western Dock (Points 1 – 25)	Average (per point)	11.0	6.0	6.1	5.7
	Minimum (per point)	5.1	2.3	2.3	2.1
	Maximum (per point)	17.1	9.8	9.9	11.5
Eastern Dock (Points 26 – 48)	Average (per point)	8.1	7.5	7.5	8.2
	Minimum (per point)	1.5	1.9	1.8	5.9
	Maximum (per point)	15.5	15.6	15.4	11.2

Table 16: Sailing Season Average, Minimum and Maximum number of days per month with good sailing quality.

7.945 To contextualise the above results, the average percentage point difference in sailing quality between each tested configuration across the entire dock would be a reduction in sailing quality of 9.6% between the baseline scenario and configuration 2 (proposed development); a reduction of 9.4% between the baseline scenario and configuration 3 (proposed development with cumulative schemes) and a reduction of 9% in configuration 4 (phased scenario) from the baseline. Translating this into the equivalent number of average days per month with good sailing quality across the entire dock the difference would be a reduction of 2.9 days per month in configuration 2, a reduction of 2.8 days in configuration 3 and a reduction of 2.7 days in configuration 4 from the baseline scenario.

7.946 A more detailed summary of configurations C4, C2 and C3 are provided below.

Configuration C4: Phased Construction Scenario

7.947 In this scenario, the ES reports that due to the location of the site, the impact on the predominant wind direction from the southwest is minimal with the wind direction from the north and northeast being the main wind direction which is affected by the proposed development. The north and north-eastern wind component are more prominent in April and May with some levels of wind throughout the other months. In terms of the entire dock, the sailing quality conditions when averaged across the dock area would change from 32.0% in the existing baseline to 23%; an average reduction of 9.0%. This translates to an average of 6.9 days per month and a maximum of 11.5 days per month where good sailing quality would be achieved across the entire dock. The ES reports that as this change is less than 15%, this would be a Minor Adverse effect (Not Significant).

7.948 Sailing quality varies across the dock and there are both reductions and increases in the time with good sailing quality at individual probes. Areas northwest tending towards the centre of the dock will experience a reduction in time with good sailing quality, with the largest reduction in time with good sailing being 44.1% at probe location 10. There would be an increase in time with good sailing quality in the north-eastern area of the dock. The biggest increase in time with good sailing quality is 17.0% at probe location 33 and for the southern area of the dock, there is some variation with probe locations 7, 18, 24 and 45 exceeding the 15% threshold. For the remainder of the dock area (i.e. eastern areas), sailing quality remains similar, and further to the east marginally better with the introduction of the construction phase of the proposed development. The ES assesses these localised effects to be Minor Adverse (Not Significant).

7.949 In terms of the western end of the dock, this area would experience a reduction in time with good sailing quality. The ES reports that there is a predicted reduction of 17.7% time with good sailing quality when averaged over the western end of the dock. The level of impact exceeds the 15% significance level threshold and therefore the ES assesses the significance of effect to be Moderate Adverse (Significant).

Configuration C2: Proposed Development with Existing Surrounding Buildings:

7.950 In this scenario, the ES reports that the sailing quality conditions when averaged across the dock area tested is 22.4% of the time with good sailing quality. This translates into an average of 6.7 days per month and a maximum of 15.6 days per month where good sailing quality would be achieved across the entire dock. In this configuration, the placement of structures to the north of the dock has impacted the wind speeds and flow quality over the dock with wind directions from the north. These wind directions from the north and northeast are the main wind direction which is affected by the proposed development. The percentage sailing quality conditions for the proposed development is demonstrated diagrammatically in the image below:

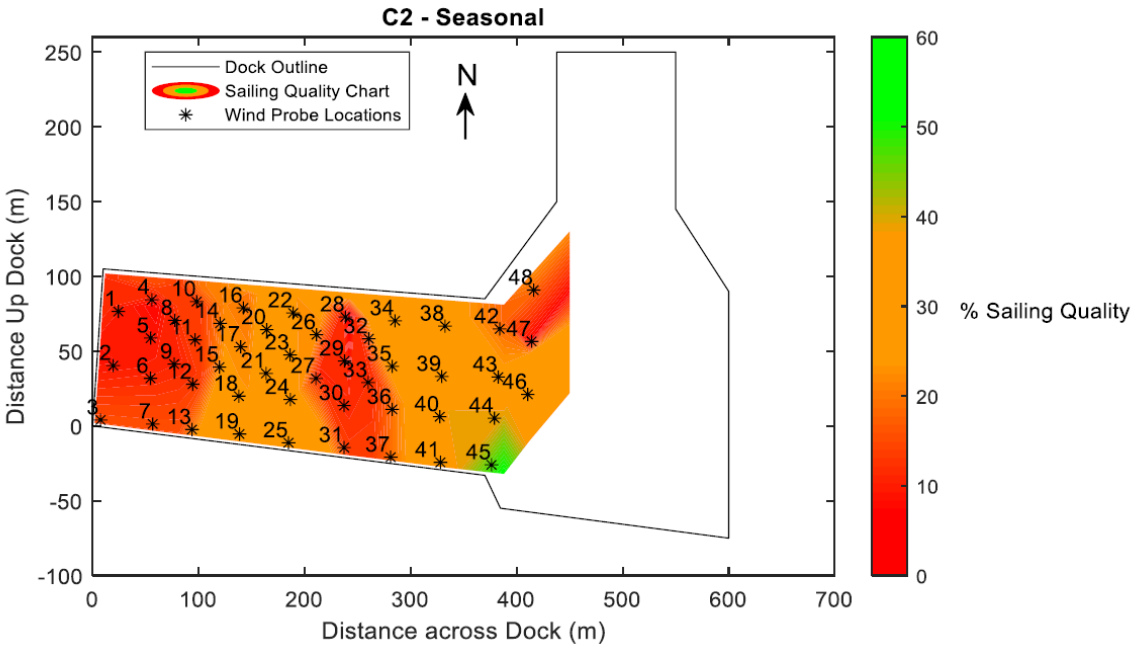


Figure 75: Configuration C2: Sailing Season Sailing Quality

7.951 In terms of the entire dock, the sailing quality conditions of 22.4% of the time with good sailing quality represents a reduction of 9.6% from the baseline scenario (32.0%) and would be less than 15%. The ES reports this to result in a Minor Adverse effect (Not Significant).

7.952 The assessment reports that whilst these results are average, the sailing quality does vary across the dock with both reductions and increases in the time with good sailing quality at individual probe locations. The north and northwestern corner of the dock will experience a reduction in time with good sailing quality with the biggest decrease in time with good sailing quality being 33.3% at probe location 4. There would also be increases in time with good

sailing quality in the north-eastern area of the dock with the biggest increase in time with good sailing quality being 10.8% at probe location 44. For the southern area of the dock, there is a slight reduction; however, the ES reports that this is still within the significance threshold and for the remainder of the dock area (i.e. eastern areas), sailing quality remains similar, and further to the east marginally better with the introduction of the proposed development. The ES concludes that these localised effects represent Minor Adverse effects (Not Significant).

7.953 The probe locations experiencing decreases in time with good sailing quality are generally adjacent to the sailing centre at its currently located pontoons and launch/recovery facilities and towards the centre of the main dock. These reductions to the sailing quality would make it more challenging for novices to sail in those areas, but this is predominantly only when the wind direction has a northern component.

7.954 In terms of the western dock, this area will experience a reduction of 16.7% in time with good sailing quality when averaged over the western end of the dock. The ES assesses this level of impact to be Moderate Adverse (Significant) when applying the 15% significance threshold.

Configuration C4: Proposed Development with Cumulative Surrounding Buildings

7.955 The assessment reports that in this configuration, there would be only subtle differences between configurations C2 and C4. The cumulative[31] scheme considered is located to the north-east and therefore predominately affects winds travelling from that direction.

7.956 The sailing quality conditions when averaged across the dock area in configuration C3 changes from 32.0% in the baseline to 22.6% (average reduction of 9.4%) and as this change is less than 15%, the ES assesses this to be a Minor Adverse (Not Significant) effect. This would also be an increase of 0.2% of sailing quality when compared to the proposed development on its own (configuration C2).

7.957 As with the other configurations tested, the sailing quality varies across the dock. There would be both reductions and increases in time with good sailing quality at individual probe locations. The northwestern corner of the dock will experience a reduction in time with good sailing quality. The biggest decrease in time with good sailing quality is 35.5% at probe location 22 (located at the north central side of the dock) which experiences a further 4% reduction in time with good sailing quality from the configuration C2 scenario.

7.958 The assessment reports that in general the probe locations showing reductions in time with good quality sailing of more than 15% are the same as C2 vs C1 and the probe locations showing reductions in time with good sailing quality below the 15% threshold are the same as C2 vs C1. These effects are assessed to be Minor Adverse (Not Significant).

7.959 It is also reported that there would be increases in time with good sailing quality in the northeast area of the dock; the biggest increase in time with good sailing quality would be 9.5% at probe 44 in the eastern end. The results in this configuration are very similar to configuration C2 (proposed development with existing surrounding buildings).

7.960 The area adjacent to the sailing centre in the western dock (where pontoons and launch recovery facilities are located) would be affected. Reductions to the sailing quality in this area would make it more challenging for novices to sail, which is likely to occur when the wind direction has a northern component. There would be a reduction of 16.5% when averaged over the western end of the dock and when applying the 15% significance level threshold this level of impact would be Moderate Adverse (Significant).

Comparison between the Proposed Development and the 2017 consented (extant) scheme

7.961 The ES has also undertaken a comparative analysis with the extant planning permission (described as configuration C2017) to ascertain if the proposed development (configuration C2) has the same or altered wind sailing results. This has been appended into the

[31] Cumulative scheme considered is PA/16/03518/A3): 49-59 Millharbour, 2-4 Muirfield Crescent and 23-39 Pepper Street.

Environmental Statement. The extant planning permission was not retested in 2023 but previous wind tunnel testing data gathered in 2017 has been utilised.

7.962 In terms of configuration C2017 (Extant Consent), the sailing quality conditions when averaged across the dock area is 25.4%. The sailing quality conditions for the extant consent can be seen in the image below:

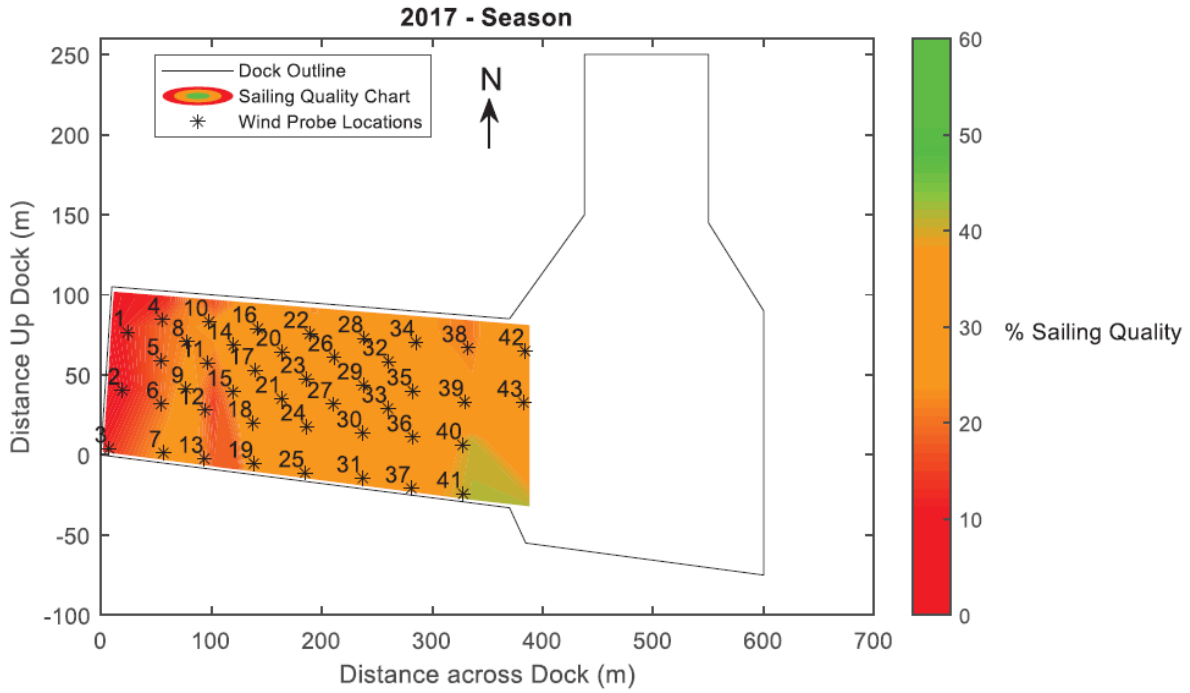


Figure 76: Configuration C2017: Extant Consent Sailing Quality

7.963 In the extant consent scenario, the eastern end of the dock has the best sailing quality conditions with the highest sailing quality of 41.7% being achieved (probe location 41). The western end of the dock exhibits lower sailing quality percentage ranging between 6.2% and 36.5% of the time with good sailing quality. The area with the worst sailing conditions under the extant consent is in the southwestern corner of the dock (around probe 2) which achieves 6.2% of the time with good sailing quality reported above.

7.964 In terms of the western end of the dock (probes 1-25), when compared to the wider dock area, it has slightly less time with good sailing quality: 22.5% of the time with good sailing quality, compared to 25.4% of the time with good sailing quality respectively.

7.965 When comparing the proposed development (configuration C2) with the extant consent (configuration C2017), the assessment reports that for the entire dock, neither the extant consent nor the proposed development exceed the 15% threshold, and therefore neither generates significant effects. When compared to one another, there is a reduction of 2.8% of the time with good sailing quality averaged over the entire dock for the proposed development. Whilst this is an average, the sailing quality varies across the dock with both reductions and increases in time with good sailing quality, as a result of the proposed development and the extant consent.

7.966 For the western end of the dock, the extant consent is within the significance threshold with the proposed development exceeding the 15% threshold by 0.9% points. The sailing quality conditions for the western end of the dock demonstrate that there would be 22.5% of the time with good sailing quality with the extant consent and 20.5% of the time with good sailing quality with the proposed development. When compared to one another, there would be a reduction of 2.0% of sailing quality for the western end of the dock for the proposed development and therefore a marginal difference.

Conclusions

7.967 The residual effects resulting from the proposed development are summarised and presented in the table below as extracted from the ES.

Receptor	Description of the Residual Effect	Scale and Nature	Significant / Not Significant	Geo	D I	P T	St Mt Lt
Demolition and Construction							
DSWC Sailors and other wind propelled water users	Reduction of sailing quality in western dock, (principally when wind from Northerly direction)	Moderate Adverse	**Significant**	L	D	T	St
DSWC Sailors and other wind propelled water users	Reduction of sailing quality for the entire dock as assessed.	Minor Adverse	Not Significant	L	D	T	St
DSWC Sailors and other wind propelled water users	Reduction of sailing quality for individual probe locations	Minor Adverse	Not Significant	L	D	T	St

Receptor	Description of the Residual Effect	Scale and Nature	Significant / Not Significant	Geo	D I	P T	St Mt Lt
Completed Development							
DSWC Sailors and other wind propelled water users	Reduction of sailing quality in western dock, (principally when wind from Northerly direction)	Moderate Adverse	**Significant**	L	D	P	Lt
DSWC Sailors and other wind propelled water users	Reduction of sailing quality for the entire dock as assessed.	Minor Adverse	Not Significant	L	D	P	Lt
DSWC Sailors and other wind propelled water users	Reduction of sailing quality for individual probe locations	Minor Adverse	Not Significant	L	D	P	Lt
Notes: Residual Effect Scale = Negligible / Minor / Moderate / Major Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

Figure 77: Residual effects of the proposed development

7.968 The assessment demonstrates that, overall, the scheme will result in Minor Adverse (Not Significant) to Moderate Adverse (Significant) effects during demolition, construction and completed development phases. In both the construction and completed development phases as detailed earlier, Moderate Adverse (Significant) effects will occur at the western end of the dock with reductions in sailing quality for novice and inexperienced sailors. However, the ES identifies that there are no direct mitigation measures or adjustments that are considered appropriate for implementation to prevent wind changes and notably increase the levels of sailing quality.

7.969 It is noted that the extant planning permission secured a sailing centre mitigation contribution of £756,000 which was proposed to be increased to £1,139 million under the Appeal Scheme. Both schemes demonstrated significant adverse effect on sailing quality in the western part of the dock. To provide some context to Members, it was reported in the Inspector's first appeal report (IR.A) that the ES for the appeal scheme found that in the then baseline scenario (i.e appeal site cleared), the quality criteria would be met on 17.9 days per month. With the Appeal Scheme in place, the criteria would be met on 10.3 days per month (equating to a reduction of 58% from the then baseline scenario). It was reported that with the extant scheme in place, the criteria would be met on 11.0 days per month equating to a reduction of 61% of the then baseline scenario. The Inspector in his report for the Appeal Scheme (IR.A) did not consider

that a difference of 3% was significant and concluded that the effect of the appeal scheme on sailing quality would not be materially different to that of the consented scheme[32].

7.970 In considering the unilateral undertaking presented at the appeal public inquiry, it was the Inspector's view that it had not been demonstrated that the package of measures identified (i.e. river-based infrastructure and equipment, a river works license, staffing, staff training and maintenance costs) would be directly related to the development or necessary to make the development acceptable in planning terms. The Inspector concluded that the obligations relating to the sailing centre mitigation contribution would not meet the tests contained in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. The Inspector maintained this position in the reopened Inquiry. For Member clarification this statutory test requires that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.

7.971 Therefore, in considering the above, Officers agree that whilst the proposed scheme demonstrates adverse impacts particularly along the western end of the dock, there are no identified means of mitigating against these impacts. The ES has been reviewed by Temple Group and with the exception of some clarifications sought, have found the sailing microclimate assessment to be acceptable and have also accepted that no mitigation measures can be secured. For Member information only, it should be noted that the Applicant is in detailed private discussions with the DSWC regarding a package of measures that the DSWC consider will address the impacts of the proposed development on their activities and help support their long-term viability. This is a private arrangement between the Applicant and the DSWC and does not form part of this planning application. Details of any such measures cannot be considered or assessed under the planning application for the reasons set out above. It should also be noted that no formal representations have been submitted from the DSWC in respect of this planning application.

Flood Risk & Drainage

7.972 Policies SI12 and SI13 of the London Plan seek to ensure that flood risk is minimised and mitigated. Developments should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out within the London Plan. The policy aspirations are also reiterated at the local level in policies D.ES4 and D.ES5 which seek to reduce the risk of flooding.

7.973 The site falls within Flood Zone 3A and is protected to a high standard by the River Thames Tidal defences. In terms of ground water flood risk, the scheme includes a large basement as detailed elsewhere in this report. The basement would have a Finished Floor Level (FFL) of 1.85m AOD which is approximately 3m below ground level and there would be the potential that it could encounter groundwater. However, the FRA states that aquifers that are located below the site have high transmissivity and would therefore allow for groundwater to freely migrate vertically and laterally and it is considered unlikely that this will result in groundwater emergence at the surface. A Basement Impact Assessment will be provided at the detailed design stage and this will be secured via condition.

7.974 The majority of the site has a very low risk of surface water flooding. The FRA reports however that there are areas of up to high risk of flooding within the north-eastern, central and western extents of the site. This would mean that ponding would occur outside of building N1 within the Boulevard. As such the FFL of building N1 is raised to a level of 5.28m AOD and as such water during a low-risk event would not enter into the building. The Boulevard would also be raised to tie into built manholes on site and would provide refuge above the 2100 (year) breach flood level. The entrance from the north-east of the site will be raised up from a level of around 4.12m AOD to a level of 5.15m AOD within the Boulevard. Any ponding that would occur outside of Plot N1 in the north-east and T1 in the north-west would be redistributed to the new low points within the site which will be towards the areas of public open space.

[32] Para.483 of IR.A of Appeal Decision dated 18th November 2021.

7.975 The risk of surface water flooding within the site would be reduced through the implementation of a sustainable drainage strategy which would provide significant betterment compared to the existing drainage arrangement. This will be secured via planning condition.

7.976 In terms of the school, this is located in the north-western corner of the site and the 2100 breach flood level at this location is 5.01m AOD. It is proposed to raise the eastern entrance and the external levels around the eastern and southern extent of the school to a level of 5.31m AOD which allows for a 300mm freeboard above the 2100 breach defence flood level. As such the first floor and southern and eastern part of the school will be free from flooding in both the current and future breach scenarios.

7.977 The FRA reports that given the alignment of the site with Westferry Road, it would not be possible to raise the western part of the school and as such the entrance into the ground floor will be located at a level of 1.9m AOD and therefore the land to the west and the ground floor would flood in the event of a 2100 breach event. It is proposed to incorporate flood resilience measures such as providing durable materials and using construction methods and materials that promote easy draining and drying as well as damp proof membranes as means of providing additional protection. In terms of the sports hall, the 2100 breach flood level at this location is 4.98m AOD and it is proposed to raise the entrance to the sports hall to the same level as the school at 5.31m AOD which allows for over 300mm freeboard above the 2100 breach flood level.

7.978 The FRA confirms that there is very low flood risk associated with the Millwall Outer and Inner Docks as they are actively managed and regularly inspected by the Canal and River Trust.

7.979 The submitted Flood Risk Assessment (FRA) has also been amended to address the Council's Flood and Water Management Team's comments and the Environment Agency have expressed no overall objections to the proposal. Conditions will be imposed to ensure relevant flood defence mitigation measures are in place as detailed above, including setting electrically sensitive and critical infrastructure throughout the site to be set at 300mm above the TE2100 threshold and ensuring that where FFL are below the TE2100 breach level that no sleeping accommodation is proposed. A Flood Warning and Evacuation Plan will also be secured via condition.

Land Contamination

7.980 The application has been reviewed by the Council's Environmental Health Land Contamination Officer and subject to standard conditions, the proposals would be acceptable. Any contamination that is identified can be addressed within the condition approval process and will ensure that the site is made safe prior to any construction or demolition works taking place.

HEALTH IMPACT ASSESSMENT

7.981 Policy D.SG3 of the Local Plan requires developments that are referrable to the Mayor of London to be supported by a Health Impact Assessment (HIA). A detailed HIA, given the scale of the application, is required. The application has not been accompanied by a detailed HIA however it was agreed during the Environmental Impact Assessment Scoping process that in place of a standalone HIA, Human Health will be scoped into the ES as a topic chapter.

7.982 The Health ES chapter has been structured around the following themes: Construction (Transport, Access and Permeability; Noise and Vibration; Land Quality; Water Quality or Availability) and Completed Development (Physical Activity; Housing Provision; Diet and Nutrition/Healthy Food; Open Space, Leisure and Play Space; Transport Modes, Access and Permeability; Community Safety; Community Identity and Social Participation; Education and Training; Employment and Income; Climate Change and Adaption; Noise and Vibration; Health and Social Care Services; Water Quality or Availability and Land Quality).

7.983 The assessment identifies that during the construction of the proposed development there would be a Moderate Beneficial effect on human health in relation to employment and income at the borough level (i.e. the provision of approximately 395 FTE jobs per year over the construction period; minimum of 20% construction job vacancies exclusively to local residents

and reasonable endeavours to advertise 20% of goods and services procured to local companies and suppliers based in the borough) .

7.984 During the operation of the proposed development, Moderate Beneficial effects on human health have been identified in relation to Physical Activity (e.g. promotes physical activity of residents, workers and visitors and provides access to new a new park on site, woodland walk, Boulevard and promenade and promotes active travel) and Community Safety (e.g. natural surveillance of pedestrian routes, active ground floor frontages and controlled access to the site for vehicles) at the local level whilst Major Beneficial effects have been identified in relation to Housing Supply (provision of 1358 new homes of which 379 would be affordable, dual aspect units maximised and all homes constructed to policy-complaint requirement for M4(2) and M4(3) units) at the local and borough level; Open Space, Leisure and Play Space (a minimum of 1 hectare of public open space proposed which includes a new park and a variety of character areas and spaces) and Transport, Accessibility and Permeability (e.g. road network improvements, car free scheme with improvements for walking and cycling) at the local level.

7.985 The Council's HIA Officer has reviewed the Health chapter of the ES and subject to a number of clarifications, no objections have been raised to the scheme. The HIA Officer has however requested a meanwhile use strategy particularly for Phase 4 of the site, the provision of some SEND child's play space, mechanisms to secure a Community Events Strategy which details community identity and social participation post-completion of the development and the submission of a post-completion Health Impact Monitoring Report. At the time of the writing of this report, the Applicant has yet to confirm agreement to the Community Events Strategy and the Health Impact Monitoring Report. Should the Applicant agree to these obligations, these will be secured via the S106 legal agreement. The Applicant has agreed to the provision of a meanwhile use strategy and SEND play provision; these will be secured via the S106 legal agreement and conditioned accordingly.

INFRASTRUCTURE IMPACT

7.986 In accordance with Policy D1 of the Isle of Dogs Neighbourhood Plan, the application has been accompanied by an Infrastructure Impact Assessment which provides a high-level summary of the potential infrastructure impacts associated with the development. Further detail has been provided across the suite of application documents including the Environmental Statement. A summary of relevant infrastructure topics are provided below:

<u>Utilities</u>

7.987 Gas, Electricity and Water: A medium pressure main has been diverted from its original route along the northern boundary into the Boulevard and the pressure-reducing station has been relocated and is now installed underground in an area that will become public realm along Westferry Road. The Energy Strategy proposes to use the dock water as the primary source for heating and hot water for the development therefore there is no requirement for gas to the site. In terms of electricity, there is a large UKPN (UK Power Network) switch room at the eastern end of the site which is retained. The Applicant has advised that an application has been made to UKPN for additional capacity to serve the full development and this would be available from other primary substations in the area: Glaucus Road, Simpsons Road and Westferry Road.

7.988 In terms of water demand, the report confirms that Thames Water has been consulted about the capacity requirement for the site. Two modelling studies have been undertaken under the two previous planning applications which confirmed that there was sufficient capacity in the network to support the development. However, Officers have also consulted Thames Water directly as part of the statutory consultation process and Thames Water have advised that they are yet to agree with the Applicant that there is sufficient capacity within the system to accommodate the development. However, Thames Water have requested a planning condition be imposed which prevents occupation of the development until confirmation has been provided that either: (a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or (b) a development and infrastructure phasing plan has been agreed with Thames Water to allow the development to

be occupied. This will ensure that there is sufficient water supply to serve the proposed development. Should planning permission be granted for this development, the appropriate conditions requested by Thames Water will be imposed.

Education

7.989 **Early Years:** Chapter 7 (Socio-Economics) of the ES assess the development's impact on local education provision. In terms of early years provision, the ES reports that it is anticipated that the proposed development would yield an early years' population (0-4 years old) of 217 children which equates to an 18% increase in the LIA (Local Impact Area). There is an identified shortfall in capacity for early years provision in the LIA and any additional demand may lead to further pressure on providers. However, the ES reports that it is not anticipated that all 217 0-4 year olds will be eligible for Free Early Education Entitlement provision (FEEE), nor will all carers seek to access early years childcare provision within the LIA

7.990 The proposed development includes a nursery/crèche measuring 349.5sqm (GIA) and could accommodate approximately 100 x 0-4 year olds. This would be sufficient to accommodate more than the 22% to 31% of families who may be eligible for FEEE. On this basis the development would give rise to a direct, long-term and Minor Adverse (Not Significant) effect at the LIA level.

7.991 **Primary School Provision:** The proposed development is expected to yield a primary school age population of 117 children aged 5 to 11 years old. As a worst-case scenario, this would lead to an erosion of existing surplus capacity in the LIA (4%) and a subsequent deficit in capacity of 2%. However, the ES reports that the Council has indicated in the Planning for School Places update that three new schools could be delivered in Area 4 (Isle of Dogs), within the plan period, which will lead to a substantial increase in capacity. This would lead to a direct, long-term and Minor Adverse (Not Significant) effect at the LIA level.

7.992 **Secondary School Provision:** The proposed development is expected to yield a secondary school age population of 170 children aged 12 to 18 years. The delivery of a 1,200 place secondary school on site will substantially increase capacity in the borough within a modern setting. As a worst-case scenario, assuming all children are additional and not already attending schools in the borough, the combination of both these factors would result in a 4% point increase in surplus capacity (from 9%-13%) meaning that capacity rises above the DfE recommended upper benchmark of 10%. This would result in a direct, long-term and Moderate Beneficial (Significant) effect at the borough level.

7.993 It is noted that George Green School have submitted an objection to the planning application expressing concerns that the inclusion of a secondary school appears to contradict the Borough's assessment of secondary school places required. The Council's Education Team acknowledges that whilst the forecasted pupil numbers across the Borough have not been realised since Canary Wharf College Crossharbour was opened by the DfE, the school has been operating on a reduced PAN (Published Admission Number) and in temporary buildings which is less than ideal for the pupils of the Borough and therefore the Education Team welcome a permanent site for the school. The Council's Education Team have also carefully considered the funding agreements of the DfE to Canary Wharf College and the needs of the wider Borough in its assessments of sites and the overall places available under the Local Plan to reflect this evolving position. Any reduction in the capacity for the site would impact negatively on the Local Authority's ability to meet its statutory duty in the provision of secondary school places within the Borough.

Health

7.994 The proposed development is expected to yield an overall population of around 3,000 persons. As a worst-case scenario, assuming all of these people would be additional (and not already registered with GPs in the LIA), this would lead to an increase in the number of registered patients per FTE GP in the LIA from 2,347 to 2,461 (+4.7%). The same increase in resident population (assuming all would be additional and not already registered), would lead to a further increase in the population per dentist. This would lead to a direct long-term and Moderate Adverse (Significant) effect at the LIA level.

Open Space

7.995 The ES reports that the baseline assessment of open space indicates that at the borough level, there is an average of 0.89ha of open and play space per 1,000 residents in the borough[33] which is marginally higher than the Fields in Trust (FIT) standard of 0.8 ha per 1,000 population. The Council's Local Plan requires that 1.2 ha per 1,000 residents of open space is required. The baseline assessment of the borough's open space indicates that borough-wide open space provision is below the Local Plan required standard and that future population growth will add further pressure on demand for open space.

7.996 The ES reports that the scheme will bring forward 20,898sqm (approximately 2.1 ha) of public open space which includes a new park, a woodland walk, and Boulevard as described in the public open space section of this report. Whilst the expected population yield of 3,000 residents at the proposed development will increase demand for open space, not all of this population will be net additional in the borough. The scheme would give rise to a direct, long-term and Minor Beneficial (Not Significant) effect at the borough level.

Mitigation

7.997 As identified above, once completed the proposed development will lead to a moderate adverse effect on the demand for GP facilities and minor adverse effect on the demand for early years and primary school places. The development will generate a substantial Community Infrastructure Levy (CIL) payment, which may be used to fund a range of infrastructure including education and healthcare which would mitigate the potential for adverse effects with regards to these infrastructure provisions.

S106 OBLIGATIONS

7.998 Development plan policies seek appropriate mitigation to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.

7.999 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as listed in the 'Recommendation' section below. Several non-financial obligations are also required to ensure that the development is acceptable in planning terms.

7.1000 It is noted that NHS North East London have requested a S106 contribution of £4,699,614 attributed to the increase in residential properties proposed on the development. However, this request is not considered to meet the tests set out in Regulation 122 of the CIL (Community Infrastructure Levy) Regulations 2010 in that it has not been demonstrated by the NHS that the planning obligation sought is a) necessary to make the development acceptable in planning terms, b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. Moreover, the NHS has been advised that CIL is the mechanism by which strategic infrastructure (i.e. infrastructure that is required to support more than one development) should be funded.

7.1001 In terms of Sport England's representations, CIL (as detailed in the next section) would also be the appropriate mechanism to secure any additional sporting and leisure facilities beyond what has been proposed as part of the development.

LOCAL FINANCE CONSIDERATIONS

7.1002 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments £35, 691,511.71 (inclusive of social housing relief and exclusive of indexation) and Mayor of London CIL of approximately £7,492,341.83 (inclusive of social housing relief and exclusive of indexation).

7.1003 Members are advised that the Council set CIL charging rates at a level that is the maximum viable, alongside a policy compliant affordable housing offer. In order to maintain viability, the

[33] LBTH Parks and Open Space Strategy (2017-2027)

costs to the Applicant of delivering strategic infrastructure on a site may be reduced from the CIL payment applicable to the site. For this application, the land and layout costs of the strategic open space are applicable to such a reduction and this is known as CIL in Kind. The value of the land and layout costs of the strategic open space are to be finalised and included in the S106 legal agreement and are currently estimated to be c.£18.3m. There are also currently on-going discussions in respect of the applicability of the proposed community centre to CIL in Kind. Any CIL in Kind value for the facility, if found appropriate, would be considerably lower than the open space value, potentially £1m-£1.5m. These discussions may also result in some minor alterations to the internal layout of the community centre.

7.1004 The CIL Regulations 2010 (as amended) allow CIL to be used to fund a wide range of infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities. The levy can be used to fund a very broad range of facilities such as play areas, open spaces, parks and green spaces, cultural and sport facilities, healthcare facilities, district heating schemes and other community facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant plan (the Development Plan and the London Plan in London).

7.1005 Assuming that the Council delivers its annual housing target of 3,931 units, the Council would qualify for a New Homes Bonus. Due to the introduction of a new threshold approach by the Government it is not possible to provide an exact amount of New Homes Bonus the proposed development would deliver.

HUMAN RIGHTS & EQUALITIES

7.1006 The proposal does not have any 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.

7.1007 The proposed new residential accommodation meets inclusive design standards and 10% of the new homes will be wheelchair accessible. The proposal will also provide blue badge spaces which will be allocated according to need. The development will also secure cycle parking in accordance with the London Design Cycling Standards to enable cycle parking for different user groups i.e., wider cycle parking spaces to accommodate non-standard sized cycles.

7.1008 The provision of 35% affordable housing would be of a particular benefit to groups that are socially/economically disadvantaged.

7.1009 Publicly accessible open space will be provided which will include new playspaces and will be fully accessible.

7.1010 A new community facility will also be provided which will be accessible to all residents.

7.1011 The application has undergone the appropriate level of consultation with public and Council consultees. The Applicant has also undertaken engagement with nearby residents and occupiers prior to the submission of the planning application.

7.1012 The proposed development would not result in adverse impacts upon equality or social cohesion.

PLANNING BALANCE

7.1013 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF emphasises the need to deliver sustainable development.

7.1014 This concluding section of the report will examine the overall planning balance of the proposed scheme and consider the public benefits of the scheme against the identified departures from relevant development plan policies.

7.1015 The application proposes a comprehensive masterplan approach to regenerating this part of the Isle of Dogs. Whilst the proposed housing densities are high, the site lies in an Opportunity Area whereby growth is expected to be accelerated. The scheme delivers a considered approach to place-making and connectivity.

7.1016 The masterplan would deliver new homes, including affordable homes. If permission is granted and the scheme is delivered, these homes would make a major and substantial contribution to Tower Hamlets' housing supply.

7.1017 A total of 35% affordable housing based on habitable rooms is proposed and the scheme would be eligible for the Fast Track route in accordance with development plan policy. The housing tenure and mix would depart from Local Plan policies, but the scheme would deliver 46.3% of the Affordable Housing tenure as larger family homes. This exceeds the minimum policy requirement of 45% in this tenure and would make a significant contribution to meeting housing needs. Officers afford this element substantial weight.

7.1018 The scheme would not meet development plan policy standards for the quantity of play space required by policy (shortfall of 779sqm). The scheme relies on utilising the MUGAs and Sports Pitch on the school grounds as contributing towards the overall play space quantum which is not considered to be justified by Officers. However, Officers recognise that the play strategy across elsewhere in the masterplan adopts good urban design principles to ensure provision of a range of play environments.

7.1019 The scheme will improve north-south connectivity towards the docks and improve permeability and legibility, prioritising pedestrians and cyclists across the masterplan. The scheme would provide new well-designed and spacious areas of public open space spread across the masterplan and there will be good quality public realm and landscaping improvements throughout the site which further assist in improving connectivity and permeability in the area, demonstrating good placemaking principles. The total quantum of public open space substantially exceeds the site allocation requirement of a minimum of 1 hectare and therefore Officers afford this element substantial weight.

7.1020 There are a number of financial and non-financial contributions to be secured as a result of the proposed development. The development would also be liable for the Council's and Mayor of London's Community Infrastructure Levy. However, these obligations and CIL would be required as a direct consequence of the scheme, to mitigate its impacts.

7.1021 The scheme would result in identified significant effects on sailing conditions with Moderate Adverse (significant) effects occurring in the western end of the dock, contrary to relevant development plan policies that seek to ensure that development proposals do not result in unacceptable microclimate impacts on existing active water uses. These impacts cannot be mitigated against however, the scheme is considered to comply with the development plan as a whole.

7.1022 The daylight and sunlight impacts to neighbouring properties from the proposed development have been set out in detail in this report. The conclusion is that the development would cause harm to the residential amenity of some neighbouring properties that surround the site when assessed against the BRE Guidelines and as such does not comply with relevant development plan policies that seek to protect neighbouring amenities. However, the scheme is considered to comply with the development plan as a whole and these impacts are weighed against the wider regeneration and place-making benefits of the proposal, which will provide much-needed new homes and amenities for the locality.

7.1023 The scheme would provide 1358 additional new homes of which 379 would be affordable homes. This is an uplift of 239 affordable units on the site compared to the extant planning permission. All the new residential units meet or exceed minimum London Plan housing standards. The scheme will deliver new areas of public open space in an area that has deficiency in access to nature. These spaces will be universally accessible by all members of the community and significantly strengthen and enhance the connectivity and legibility of the locality.

7.1024 In conclusion, the proposal is considered to comply with the development plan as a whole. In considering the above in the round and the good place-making principles of the scheme which will directly benefit existing and new residents in the Isle of Dogs, Officers therefore, on balance, find the proposal to be acceptable and consider that the wider benefits associated with the development outweighs the departure from identified Development Plan policies.

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. £651.826.40 towards construction phase employment skills training
b. £99,796.13 towards end-user phase employment skills training
c. £1,033.722 toward carbon emission off-setting
d. £152,496.1 towards development co-ordination and integration.
e. £300,000 towards bus services (provision by TFL)
f. £220,000 towards cycle hire (provision by TfL)
g. £1,186.600 DLR contribution (provision by TfL)
h. Monitoring fee to be calculated once final heads of terms are in agreement following any permission granted.
i. £20,000 towards feasibility of extending the hours of operation of the local parking zone(s)

8.3 **Non-financial obligations:**

a. Affordable housing (35% by habitable room)
   - 259 affordable rented housing units comprising 50% London Affordable Rent and 50% Tower Hamlets Living Rent.
   - 120 homes as Intermediate Housing
   - Early Stage Viability Review
   - Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to M4 (3)(2)(b) standard)

b. Access to employment
   - 20% local procurement
   - 20% local labour in construction
   - 20% local labour in end-use phase
   - 135 construction phase apprenticeships
   - 1 x end-user phase apprenticeships

c. Transport matters:
   - Car Free development (residential)
   - Approval and implementation of Car Park Management Plan
   - Residential, Commercial and School Travel Plans
   - S278 Agreement (Westferry Road access realignment, northbound bus stop extended in length, double yellow lines proposed along Westferry Road, provision of a pedestrian zebra crossing and installation of Copenhagen style crossing on Westferry Road entrance).

d. School:
   - Agreement for lease to DfE
   - Public access of Multi-Use Games Area and other school sports facilities

e. Community Centre
   - Lease to a locally-based charity or community organisation, to be approved by LBTH

f. Creche operation and letting strategy (on commercial basis)

g. Phasing obligations (to ensure delivery of scheme within agreed sequencing and timeframes)

h. 'Be Seen' energy monitoring

i. Architect retention and design certification

j. Public Realm/Public Open Space (including temporary public open space provision) and playspace access/ management including compliance with Public London Charter

k. Strategic Public Realm delivery, including access and management

l. Land to be safeguarded for Cycle Hire Docking Station (TfL)

m. Amenities strategy to allow occupiers of Affordable Housing units to access common amenities on a pay-to-use basis.

n. Meanwhile Use Strategy

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. Time Limit (development to begin no later than three years from date of permission)
2. Development in accordance with Approved Plans
3. Quantum of Development (restriction on floor spaces for individual land uses)
4. Maximum Floorspace for Class E Uses (restriction on Class E floorspace)
5. Environmental Statement Mitigation Measures (development to be implemented in accordance with)
6. PD Restriction on Commercial, Business and Services (Class E) to Residential.
7. PD Restriction on Erection of Fences
8. PD Restrictions on Painting of External Brickwork and Masonry
9. No Plant, Water Tanks on Roof.
10. No Pipes on Building Face
11. Smart Meter Installation
12. S61 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) Ground-borne vibration limits; and
    d) Noise pollution limits
13. Nesting Birds
14. School Operation Hours (to teaching hours to start by 08:30AM and finish by 15:55PM)
15. No Roller Shutters
16. Public Routes (public routes to be maintained during construction)
17. No construction within 5m of Thames Water main.
18. Hours of Use (Use Class E(b) (f) and F2(b)) (uses restricted to 08:00 to 00:00 Monday to Saturdays and Bank Holidays and 10:00 to 23:00 hours on Sundays)
19. Control of the use of Communal Terraces (communal roof terraces not to be used after 21:00).
20. Active Ground Floor Frontages (external glazed surfaces to the ground floor frontages to be maintained wholly transparent).

Pre-commencement

21. Phasing Plan (phasing plan to be submitted and development to be implemented sequentially).
22. CIL Phasing (phasing plan for the purposes of CIL charging to be submitted)
23. Code of Construction Practice Checklist (checklist to be submitted together with Construction Management Plan, Site Environmental Management Plan, Dust and Air Quality Management Plan, Site Waste Management Plan and application for S61 consent).
24. No Aerials on Roof
25. Digital Connectivity
26. Basement Impact Assessment
27. Non-Road Mobile Machinery (including proof of registration of all Non-Road Machinery (NRMM))
28. Land Contamination (submission of a remediation scheme, site investigation scheme, risk assessment, verification report and monitoring and maintenance plan)
29. Groundwater Monitoring
30. Waterborne Transport Feasibility
31. Archaeology Written Scheme of Investigation
32. Cranes (submission of construction methodology, location, height and operating radius)
33. Bird Hazard Management Plan
34. Circular Economy Statement
35. Construction Phase Ecological Mitigation (submission of Biosecurity Plan, mitigation for impact of piling noise and vibration of fish, Jersey Cudweed Strategy for translocation, root protection of any retained trees and sensitive lighting to avoid spill to Millwall and West India Dock SINC).
36. Community Use (details of a community use condition for the sports block)
37. Sport Hall, MUGA and Artificial Pitch Design (details to be submitted of design and layout of the sports hall, MUGAs and artificial pitch).

Prior to Superstructure/Above Ground Works

38. Materials – submission of details (details of external cladding, brick or other material, details of bond, mortar, pointing, samples, drawings of fenestration, details of entrances, roofings, balconies terraces, balustrades, soffits and drainage, details of external rainwater goods, glues, grilles, louvres and vents, external plant and a Green Procurement Plan)
39. Inclusive Communal Amenity and Play Spaces
40. Fire Strategy
41. Landscaping – submission of details (hard landscaping including public realm materials, planter enclosures, drainage, kerbs, permeable and impermeable paving surfaces, accessibility and inclusivity details including ground levels, gradients, improvements to the Green Grid, soft landscaping including tree species, number and spacing of trees, tree pit details and urban greening, provisions for communal gardening, play equipment details, hard infrastructure including lighting, cctv, security measures, street furniture, boundary treatment, public art locations, and wind mitigation measures)
42. Water Efficiency
43. Secure by Design
44. Sustainable Urban Drainage
45. Flood Warning Evacuation Plan
46. Biodiversity Measures (submission of site wide and per phase Ecology Strategies to include details of biodiverse roofs, landscaping to include good diversity of nectar-rich plants, at least 50% of trees to be native, details to retain viable population of Jersey Cudweed, details of external lighting to minimise light spill onto areas likely to be used by foraging bats, details of minimum areas priority habitats, bat boxes, insect boxes, nest boxes, submission of a Biosecurity Plan to prevent the introduction and/or spread of non-native species and details of maintenance and management provisions)
47. Piling Method Statement
48. Waterway Wall Survey (survey condition of Waterway Wall to ensure its stability)

49. Details of Measures to Protect Millwall Outer Dock (details to be submitted include plans demonstrating proximity of the works, risk assessment and method statement, an assessment of any excess loadings to the dock walls, details of how the basement structure will be lined or waterproofed to prevent water ingress.
50. Barkantine Energy Centre Air Quality Mitigation (submission of a report assessing impact of emissions from the existing energy centre flues on buildings N1, N2 and N3 together with any mitigation and remedial measures).

Prior to Completion/Occupation

51. Inclusive Access (10% of dwellings to be M4(3) and 90% M4(2))
52. Wheelchair Unit Marking (9 months prior to completion of first wheelchair housing unit within a Phase)
53. Energy and Sustainability Standards (compliance with approved Energy Strategy, achieve a minimum of 71% site wide reduction in carbon dioxide emissions, installation of photovoltaic array system, non-residential units to achieve BREEAM 'Very Good' and the school to achieve BREEAM 'Excellent', connection to a future district heating network, compliance with Building Regulations in respect of water consumption, post completion verification report for photovoltaic array system)
54. Whole Life-Cycle Carbon Assessment
55. Shopfronts (submission of details including all materials, finishes and drawings at a scale of no less than 1:20).
56. On-site Car Parking (20% of residential spaces to be EVCP with remaining 80% to have passive provision and submission of a car parking management plan)
57. Cycle Parking (compliance with London Plan standards, cycle management plan and 5% of long stay spaces to be designed to London Cycling Design Standards)
58. Delivery and Servicing Plan (Non-Residential)
59. Delivery and Servicing Plan (Residential)
60. Operational Site Waste Management Plan
61. Noise Insulation Verification Report for New Residential Units (restriction on ambient noise and vibration levels)
62. Noise from Plants
63. Details of Lighting (including a lux plan indicating any light spill over the waterspace)
64. Lifesaving Equipment (details of riparian lifesaving equipment such as grab chains access ladders and life buoys)
65. Development and Infrastructure Phasing Plan (confirmation to Thames Water that all water network upgrades have been completed or a development and infrastructure phasing plan has been agreed with Thames Water).
66. Kitchen Extract Standards for Commercial Use (details of extract systems for all food and drink uses)
67. Proposed Tree Planting (full details of tree planning per Phase)
68. School Floodlights (details of school floodlighting)
69. Biodiverse Roofs (details of biodiverse roofs and evidence of installation)
70. Wellbeing and Satisfaction Survey (to be distributed to all residents within 6 months of occupation of each Phase).

8.7 **Informatives**

1. Permission subject to a legal agreement
2. Development liable for CIL
3. Street naming and numbering
4. Cadent Gas asset protection (legal rights of access or restrictive covenants must not be infringed)
5. Code of Construction Practice Checklist
6. Canal and River Trust (access to CRT land and water during construction must be agreed and developer should refer to the CRT Code of Practice for works affecting the CRT)
7. Air Emission Flue (Flues must discharge at least 1 metre above highest part of nearby buildings)

8. Biosecurity Plan (in accordance with the Marine Biosecurity Planning Guidance and relevant best practice management principles)
9. Contact S106 Officer (evidence compliance with S106 legal obligations)
10. Sport Egland informative - Design and Layout of sports facilities should comply with relevant industry technical guidance.

APPENDIX 1

LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

Application Drawing No:	Revision No:	Description
Existing Plan		
WFP-PLP-MP-DRG-A-03000	01	Site Location Plan as Existing
Site Location Plan		
WFP-PLP-MP-DRG-A-03001	01	Site Location Plan as Proposed
Masterplan Elevations		
WFP-PLP-MP-DRG-A-03204	00	Masterplan East Elevation
WFP-PLP-MP-DRG-A-03200	00	Masterplan North Elevation 01
WFP-PLP-MP-DRG-A-03201	00	Masterplan North Elevation 02
WFP-PLP-MP-DRG-A-03202	00	Masterplan South Elevation 01
WFP-PLP-MP-DRG-A-03203	03	Masterplan South Elevation 02
WFP-PLP-MP-DRG-A-03205	00	Masterplan West Elevation
Masterplan Floor Plans		
WFP-PLP-MP-DRG-A-03100	03	Proposed Ground Floor Masterplan
WFP-PLP-MP-DRG-A-03099G	00	Proposed Lower Ground Floor Masterplan
WFP-PLP-MP-DRG-A-03100M	03	Proposed Mezzanine Masterplan
WFP-PLP-MP-DRG-A-03199	01	Proposed Roof Masterplan
WFP-PLP-MP-DRG-A-03100Z	01	Proposed Typical Floor Masterplan
Masterplan Sections		
WFP-PLP-MP-DRG-A-03300	00	Masterplan Section A-A
WFP-PLP-MP-DRG-A-03301	01	Masterplan Section B-B
WFP-PLP-MP-DRG-A-SK004	00	East West Sections
Public Realm Plans		
WFP-LDA-ZZ-ZZ-DR-L-06000	P2	Levels and Drainage Site Wide Plan
WFP-LDA-ZZ-00-DR-L-02000	P2	Public Realm Detail Hardworks Plan Sheet 1 of 5
WFP-LDA-ZZ-00-DR-L-02001	P2	Public Realm Detail Hardworks Plan Sheet 2 of 5
WFP-LDA-ZZ-00-~DR-L-02002	P2	Public Realm Detail Hardworks Plan Sheet 3 of 5
WFP-LDA-ZZ-00-DR-L-02003	P2	Public Realm Detail Hardworks Plan Sheet 4 of 5
WFP-LDA-ZZ-00-DR-L-02004	P2	Public Realm Detail Hardworks Plan Sheet 5 of 5
WFP-LDA-XX-XX-DR-L-2031	P1	Public Realm Hardworks Edge Types Key
WFP-LDA-XX-XX-DR-L-2032	P1	Public Realm Hardworks Furniture Types Key
WFP-LDA-XX-XX-DR-L-2030	P1	Public Realm Hardworks Paving Key
WFP-LDA-XX-XX-DR-L-03005	P1	Public Realm Softworks Key
WFP-LDA-ZZ-00-DR-L-02020	P2	School Hardworks Plan Sheet 1 of 2
WFP-LDA-ZZ-00-DR-L-02021	P2	School Hardworks Plan Sheet 2 of 2
WFP-LDA-ZZ-ZZ-DR-L-01001	P2	Site Wide Podium Terraces General Arrangement Plan
WFP-LDA-ZZ-00-DR-L-1000	P2	Site Wide Public Realm General Arrangement Plan
WFP-LDA-ZZ-ZZ-DR-L-01009	P2	Site Wide Roof General Arrangement Plan
WFP-LDA-ZZ-00-DR-L-01011	P2	Site Wide Tree Removal Plan

WFP-LDA-ZZ-ZZ-DR-L-01010	P2	Urban Green Factor Plan
Basement Plans		
WFP-PLP-BA-DRG-A-03099	00	Basement Plan
WFP-PLP-MP-DRG-A-03099	00	Proposed Basement Masterplan
W1 Elevations and Sections		
WFP-PLP-W1-DRG-A-03200	00	W1 Elevations
WFP-PLP-W1-DRG-A-3300	00	W1 Sections
W1 Floor Plans		
WFP-PLP-W1-DRG-A-03100	00	W1 Lower and Upper Ground Floor Plan
WFP-PLP-W1-DRG-A-03101	01	W1 L01-L02 Floor Plan
WFP-PLP-W1-DRG-A-03103	01	W1 L03-L09 Floor Plan
WFP-PLP-W1-DRG-A-03110	01	W1 L10 Floor Plan
WFP-PLP-W1-DRG-A-03199	00	W1 Roof Plan
E1 Elevations and Sections		
WFP-PLP-E1-DRG-A-03200	00	E1 Elevations (1 of 2)
WFP-PLP-E1-DRG-A-03201	00	E1 Elevations (2 of 2)
WFP-PLP-E1-DRG-A-03300	00	E1 Sections
E1 Floor Plans		
WFP-PLP-E1-DRG-A-03100	00	E1 Ground Floor & Mezzanine Plan
WFP-PLP-E1-DRG-A-03101	01	E1 L01-13 Floor Plan
WFP-PLP-E1-DRG-A-03114	01	E1 L14 Floor Plan
WFP-PLP-E1-DRG-A-03199	00	E1 Roof Plan
E1 and W1 Façade Detail Plan		
WFP-PLP-E1-DRG-A-03400	00	E1 and W1 Façade Details
N1 and N2 Elevations and Sections and Façade Details		
WFP-PLP-N12-DRG-A-03200	01	N1 N2 Elevations (1 of 2)
WFP-PLP-N12-DRG-A-03201	00	N1 N2 Elevations (2 of 2)
WFP-PLP-N12-DRG-A-03300	00	N1 N2 Sections
WFP-PLP-N2-DRG-A-03400	00	N2 Façade Details
N1 and N2 Floor Plans		
WFP-PLP-N12-DRG-A-03099	00	N1 N2 Basement Plan
WFP-PLP-N12-DRG-A-03100	01	N1 N2 Ground Floor Plan
WFP-PLP-N1-DRG-A-03101	01	N1 L01-L03 Floor Plan
WFP-PLP-N1-DRG-A-03104	01	N1 L04 Floor Plan
WFP-PLP-N1-DRG-A-03105	01	N1 L05-08 Floor Plan
WFP-PLP-N2-DRG-A03101	01	N2 L01-L03 Floor Plan
WFP-PLP-N2-DRG-A-03104	01	N2 L04 Floor Plan
WFP-PLP-N2-DRG-A-03105	01	N2 L05-09 Floor Plan
WFP-PLP-N12-DRG-A-03199	01	N1 N2 Roof Plan
N3 Elevations and Sections		
WFP-PLP-N3-DRG-A-03200	01	N3 Elevations (1 of 2)
WFP-PLP-N3-DRG-A-03201	01	N3 Elevations (2 of 2)
WFP-PLP-N3-DRG-A-03300	01	N3 Sections
N3 Floor Plans		

WFP-PLP-N3-DRG-A-03100	01	N3 Ground Floor Plan
WFP-PLP-N3-DRG-A-03101	01	N3 L01-08 Floor Plan
WFP-PLP-N3-DRG-A-03109	01	N3 L09 Floor Plan
WFP-PLP-N3-DRG-A-03199	00	N3 Roof Plan
N1 and N3 Façade Details		
WFP-PLP-N1-DRG-A-03400	00	N1 N3 Façade Details
C1 and T1 Elevations		
WFP-PLP-C1-DRG-A-03200	01	C1 Elevations (1 of 2)
WFP-PLP-C1-DRG-A-03201	01	C1 Elevations (2 of 2)
WFP-PLP-T1-DRG-A-03200	00	T1 Elevations (1 of 2)
WFP-PLP-T1-DRG-A-03201	00	T1 Elevations (2 of 2)
C1 and T1 Floor Plans		
WFP-PLP-C1T1-DRG-A-03100	01	C1 T1 Ground Floor Plan
WFP-PLP-C1T1-DRG-A-03100M	01	C1 T1 Mezzanine Plan
WFP-PLP-C1T1-DRG-A-03100Z	01	C1 T1 Typical Floor Plan
WFP-PLP-C1T1-DRG-A-03199	01	C1 T1 Roof Plan
WFP-PLP-C1-DRG-A-0310N	01	C1 L01 Floor Plan North
WFP-PLP-C1-DRG-A-03101S	01	C1 L01Floor Plan South
WFP-PLP-C1-DRG-A-03102N	01	C1 L02-05 Floor Plan North
WFP-PLP-C1-DRG-A-03102S	01	C1 L02-05 Floor Plan South
WFP-PLP-C1-DRG-A-03106N	01	C1 L06 Floor Plan North
WFP-PLP-C1-DRG-A-03106S	01	C1 L06 Floor Plan South
WFP-PLP-C1-DRG-A-03107N	01	C1 L07 Floor Plan North
WFP-PLP-C1-DRG-A-03107S	01	C1 L07 Floor Plan South
WFP-PLP-T1-DRG-A-03101	01	T1 L01-L06 Floor Plan
WFP-PLP-T1-DRG-A-03107	01	T1 L07-18 Floor Plan
C1 and T1 Sections		
WFP-PLP-C1-DRG-A-03300	00	C1 Sections
WFP-PLP-T1-DRG-A-03300	00	T1 Sections
C1 Façade Details		
WFP-PLP-C1-DRG-A-03400	00	C1 Façade Details
C2 and T2 Elevations		
WFP-PLP-C2-DRG-A-03200	00	C2 Elevations (1 of 2)
WFP-PLP-C2-DRG-A-03201	01	C2 Elevations (2 of 2)
WFP-PLP-T2-DRG-A-03200	00	T2 Elevations (1 of 2)
WFP-PLP-T2-DRG-A-03201	00	T2 Elevations (2 of 2)
C2 and T2 Floor Plans		
WFP-PLP-C2T2-DRG-A-03100	01	C2 T2 Ground Floor Plan
WFP-PLP-C2T2-DRG-A-03100M	01	C2 T2 Mezzanine Plan
WFP-PLP-C2T2-DRG-A-03100Z	01	C2 T2 Typical Floor Plan
WFP-PLP-C2T2-DRG-A-03199	01	C2 T2 Roof Plan
WFP-PLP-C2-DRG-A-03101N	01	C2 L01 Floor Plan North
WFP-PLP-C2-DRG-A-03101S	01	C2 L01 Floor Plan South
WFP-PLP-C2-DRG-A-03102N	01	C2 L02-L06 Typical Floor Plan North
WFP-PLP-C2-DRG-A-03102S	01	C2 L02-L06 Typical Floor Plan South
WFP-PLP-C2-DRG-A-03107N	01	C2 L07 Floor Plan North
WFP-PLP-C2-DRG-A-03107S	01	C2 L07 Floor Plan South
WFP-PLP-C2-DRG-A-03108N	01	C2 L08 Foor Plan North
WFP-PLP-C2-DRG-A-03108S	01	C2 L08 Floor Plan South
WFP-PLP-C2-DRG-A-03109N	01	C2 L09 Floor Plan North
WFP-PLP-C2-DRG-A-03109S	01	C2 L09 Floor Plan South

WFP-PLP-T2-DRG-A-03101	01	T2 L01-L06 Floor Plan
WFP-PLP-T2-DRG-A-03107	01	T2 L07-22 Floor Plan
C2 and T2 Sections		
WFP-PLP-C2-DRG-A-03300	01	C2 Sections
WFP-PLP-T2-DRG-A-03300	00	T2 Sections
C2 Façade Details		
WFP-PLP-C2-DRG-A-03400	00	C2 Façade Details
C3 and T3 Elevations		
WFP-PLP-C3-DRG-A-03200	00	C3 Elevations (1 of 2)
WFP-PLP-C3-DRG-A-03201	01	C3 Elevations (2 of 2)
WFP-PLP-T3-DRG-A-03200	00	T3 Elevations (1 of 2)
WFP-PLP-T3-DRG-A-03201	00	T3 Elevations (2 of 2)
C3 and T3 Floor Plans		
WFP-PLP-C3T3-DRG-A-03100	01	C3 T3 Ground Floor Plan
WFP-PLP-C3T3-DRG-A-03100M	01	C3 T3 Mezzanine Plan
WFP-PLP-C3T3-DRG-A-03100Z	01	C3 T3 Typical Floor Plan
WFP-PLP-C3T3-DRG-A-03199	01	C3 T3 Roof Plan
WFP-PLP-C3-DRG-A-03101N	01	C3 L01 Floor Plan North
WFP-PLP-C3-DRG-A-03101S	01	C3 L01 Floor Plan South
WFP-PLP-C3-DRG-A-03102N	01	C3 L02-L07 Floor Plan North
WFP-PLP-C3-DRG-A-03102S	01	C3 L02-L07 Floor Plan South
WFP-PLP-C3-DRG-A-03108N	01	C3 L08 Floor Plan North
WFP-PLP-C3-DRG-A-03108S	01	C3 L08 Floor Plan South
WFP-PLP-C3-DRG-A-03109N	01	C3 L09 Floor Plan North
WFP-PLP-C3-DRG-A-03109S	01	C3 L09 Floor Plan South
WFP-PLP-C3-DRG-A-03110N	01	C3 L10 Floor Plan North
WFP-PLP-C3-DRG-A-0310S	01	C3 L10 Floor Plan South
WFP-PLP-T3-DRG-A-03101	01	T3 L01-L05 Floor Plan
WFP-PLP-T3-DRG-A-03106	01	T3 L06 Floor Plan
WFP-PLP-T3-DRG-A-03107	01	T3 L07-26 Floor Plan
C3 Façade Details		
WFP-PLP-C3-DRG-A-03400	00	C3 Façade Details
C3 and T3 Sections		
WFP-PLP-C3-DRG-A-03300	01	C3 Sections
WFP-PLP-T3-DRG-A-03300	00	T3 Sections
T1-T3 Façade Details		
WFP-PLP-T1-DRG-A-03400	00	T1-T3 Façade Details
T4 Elevations, Façade Details and Sections		
WFP-PLP-T4-DRG-A-03200	00	T4 Elevations (1 of 2)
WFP-PLP-T4-DRG-A-03201	00	T4 Elevations (2 of 2)
WFP-PLP-T4-DRG-A-03400	00	T4 Façade Details
WFP-PLP-T4-DRG-A-03300	00	T4 Sections
T4 Floor Plans		
WFP-PLP-T4-DRG-A-03100	00	T4 Ground Floor and Mezzanine Plan
WFP-PLP-T4-DRG-A-03101	01	T4 L01-09, L11-19 Floor Plan
WFP-PLP-T4-DRG-A-03110	01	T4 L10 Floor Plan
WFP-PLP-T4-DRG-A-03120	01	T4 L20-27 Floor Plan

WFP-PLP-T4-DRG-A-03128	01	T4 L28 Floor Plan
WFP-PLP-T4-DRG-A-03129	01	T4 L29 Floor Plan
WFP-PLP-T4-DRG-A-03130	01	T4 L30 Floor Plan
WFP-PLP-T4-DRG-A-03199	00	T4 Roof Plan
School Plans		
12-1578-HLM-01-ZZ-D-A-00100	P05	Proposed Site Plan
12-1578-HLM-01-00-D-A-00101	P05	Proposed Lower Ground Floor GA Plan
12-1578-HLM-01-01-D-A-00102	P05	Proposed Ground Floor GA Plan
12-1578-HLM-01-02-D-A-00103	P05	Proposed First Floor GA Plan
12-1578-HLM-01-03-D-A-00104	P05	Proposed Second Floor GA Plan
12-1578-HLM-01-04-D-A-00105	P05	Proposed Third Floor GA Plan
12-1578-HLM-01-RF-D-A-00106	P05	Proposed Roof Level GA Plan
12-1578-HLM-01-XX-D-A-00201	P04	Proposed East and West Elevations
12-1578-HLM-01-XX-D-A-00202	P04	Proposed North and South Elevations
12-1578-HLM-01-XX-D-A-00203	P04	Proposed Sports Block Elevations
12-1578-HLM-01-XX-D-A-00301	P04	Proposed Section A & B
12-1578-HLM-01-XX-D-A-00302	P04	Proposed Section C & D
12-1578-HLM-01-XX-D-A-00303	P04	Proposed Section E & F
Substation Plan		
WFP-PLP-MP-DRG-A-SK005	00	Proposed Switch Room
Masterplan – GEA, GIA and Unit Mix Schedules		
WFP-PLP-MP-SCH-A-03600	03	

APPLICATION DOCUMENTS

DOCUMENT TITLE	PREPARED BY
Planning Statement – December 2023 (Revised May 2024)	DP9
Affordable Housing Statement – December 2023 (Amended June 2024)	DP9
Infrastructure Impact Assessment – December 2023	DP9
Statement of Community Involvement – December 2023 (Amended June 2024)	DP9
Design and Access Statement Volume 1 Masterplan and Design Development – December 2023	PLP Architecture, LDA Design and HLM Architects
Design and Access Planning Addendum – May 2024	PLP Architecture, LDA Design and HLM Architects
Design and Access Statement Volume 2 Proposed Buildings – December 2023	PLP Architecture, LDA Design and HLM Architects
Design and Access Statement Volume 2 Proposed Buildings (school) – December 2023	PLP Architecture, LDA Design and HLM Architects
Design and Access Statement Volume 3 – Public Realm – December 2023	PLP Architecture, LDA Design and HLM Architects
N1, N2 & N3 Podium Courtyard-Landscape and Public Realm – May 2024	PLP Architecture andLDA Design
Play Summary Report - June 2024	LDA Design
Transport Assessment – December 2023	Royal HaskoningDHV
Operational Waste Management Strategy – December 2023	Royal HaskoningDHV

Addendum to the Waste Management Strategy – 8th July 2024	Royal HaskoningDHV
Framework Travel Plan – December 2023	Royal HaskoningDHV
School Travel Plan – December 2023	Royal HaskoningDHV
Outline Construction Logistics Plan – December 2023	Royal HaskoningDHV
Delivery and Servicing Plan – December 2023	Royal HaskoningDHV
Flood Risk Assessment 15th May 2024 Issue 4	RMA Environmental
Energy Statement – December 2023	AECOM
Sustainability Statement Rev 04 – December 2023	AECOM
Utilities Infrastructure Report Rev 01 – December 2023	AECOM
Whole Life Carbon Assessment	AECOM
Circular Economy Statement	AECOM
Overheating Technical Note Rev 03 – 17th May 2024	AECOM
Construction Management Plan LBTH Proforma - December 2023	Westferry Developments Limited
Outline Construction Environmental Management Plan (CEMP) – December 2023	Mace
Archaeology Desk Based Assessment Issue 2 – December 2023	MOLA
Arboricultural Impact Assessment - December 2023	Valley Trees
Commercial Demand and Strategy Report – December 2023	Shackleton
Town Centre Use Impact Assessment – December 2023	Urban Shape Planning Consultants
Gateway 1 + London Plan Fire Statement – December 2023	Kiwa Fire Safety Compliance
Outline Fire Strategy (Courtyard Buildings & Waterfront Towers) – December 2023	Kiwa Fire Safety Compliance
Aviation Impact Assessment	Pagerpower Urban & Renewables
Outline Drainage Strategy – December 2023	WSP
Drainage Strategy Technical Note – 17th May 2024	WSP
Daylight and Sunlight Within Report – December 2023	Anstey Horne
Daylight & Sunlight within the Proposed Dwellings and Sunlight to Proposed Amenity Spaces Addendum Report – 17th May 2023	Anstey Horne
Biodiversity Net Gain Assessment – November 2023	LUC
Economic Benefits Statement – December 2023	Ekosgen

ENVIRONMENTAL STATEMENT DOCUMENTS

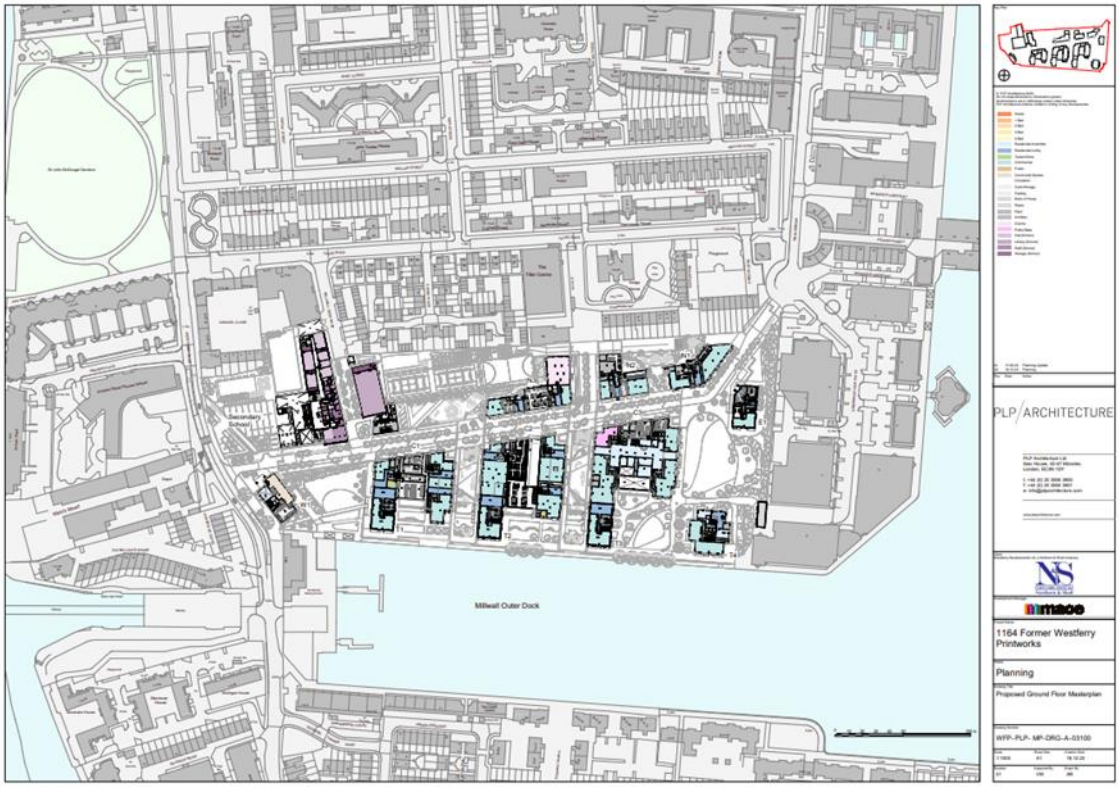
VOLUME/REPORT	DOCUMENT	PREPARED BY
	Non-Technical Summary (NTS)	Trium

VOLUME 1	Chapter 1: Introduction	Trium - All Volume 1 Chapters
	Chapter 2: EIA Methodology	
	Chapter 3: Alternatives and Design Evolution	
	Chapter 4: The Proposed Development	
	Chapter 5: Construction	
	Chapter 6: Climate Change	
	Chapter 7: Socio-Economics	
	Chapter 8: Health	
	Chapter 9: Traffic and Transport	
	Chapter 10: Air Quality	
	Chapter 11: Noise and Vibration	
	Chapter 12:Daylight, Sunlight, Overshadowing, Light Spillage, Solar Glare and Solar Irradiance	
	Chapter 13a: Pedestrian Wind Microclimate	
	Chapter 13b: Sailing Wind Microclimate	
	Chapter 14a: Terrestrial Ecology	
	Chapter 14b: Aquatic Ecology	
	Chapter 15: Geoenvironmental (Ground Conditions, Groundwater and Soils)	
	Chapter 16: Water Resources, Flood Risk and Drainage	
	Chapter 17: Effects Interactions	
	Chapter 18:Likely Significant Effects and Conclusions	
	Chapter 19: Environmental Management, Mitigation and Monitoring Schedule	
VOLUME 2	Built Heritage, Townscape and Visual Impact Assessment	Trium
VOLUME 3 (TECHNICAL APPENDICES)	Introduction	Trium – All Volume 3 Appendices
	EIA Methodology	
	Construction	
	Climate Change	
	Socio-Economics	
	Health	
	Traffic and Transport	
	Air Quality	
	Noise and Vibration	
	Daylight, Sunlight, Overshadowing, Light Spillage, Solar Glare and Solar Irradiance	
	Pedestrian Wind	
	Sailing Wind	
	Terrestrial Ecology	
	Aquatic Ecology	
	Geoenvironmental	
	Waer Resources	

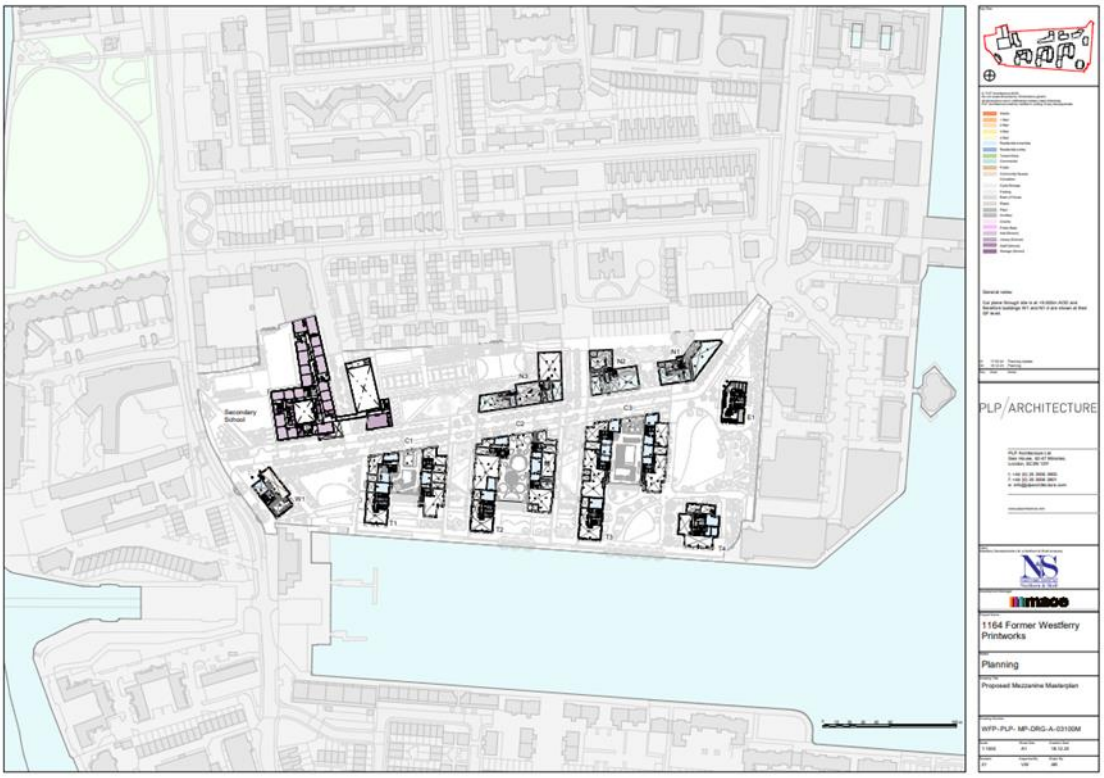
ENVIRONMENTAL STATEMENT	Statement of Conformity – May 2024	Trium
THIRD PARTY REVIEW	Interim Review Report: March 2023	Temple Group
	Final Review Report 001: April 2024	Temple Group
	Final Review Report 002: May 2024	Temple Group
	Final Review Report 003: June 2024	Temple Group
ES FURTHER/OTHER INFO	ES Interim Review Report Response Letter: April 2024	Trium
	ES FRR Response Letter: May 2024	Trium
	ES FRR 002 Response Letter: June 2024	Trium

APPENDIX 2 – SELECTION OF PLANS AND IMAGES

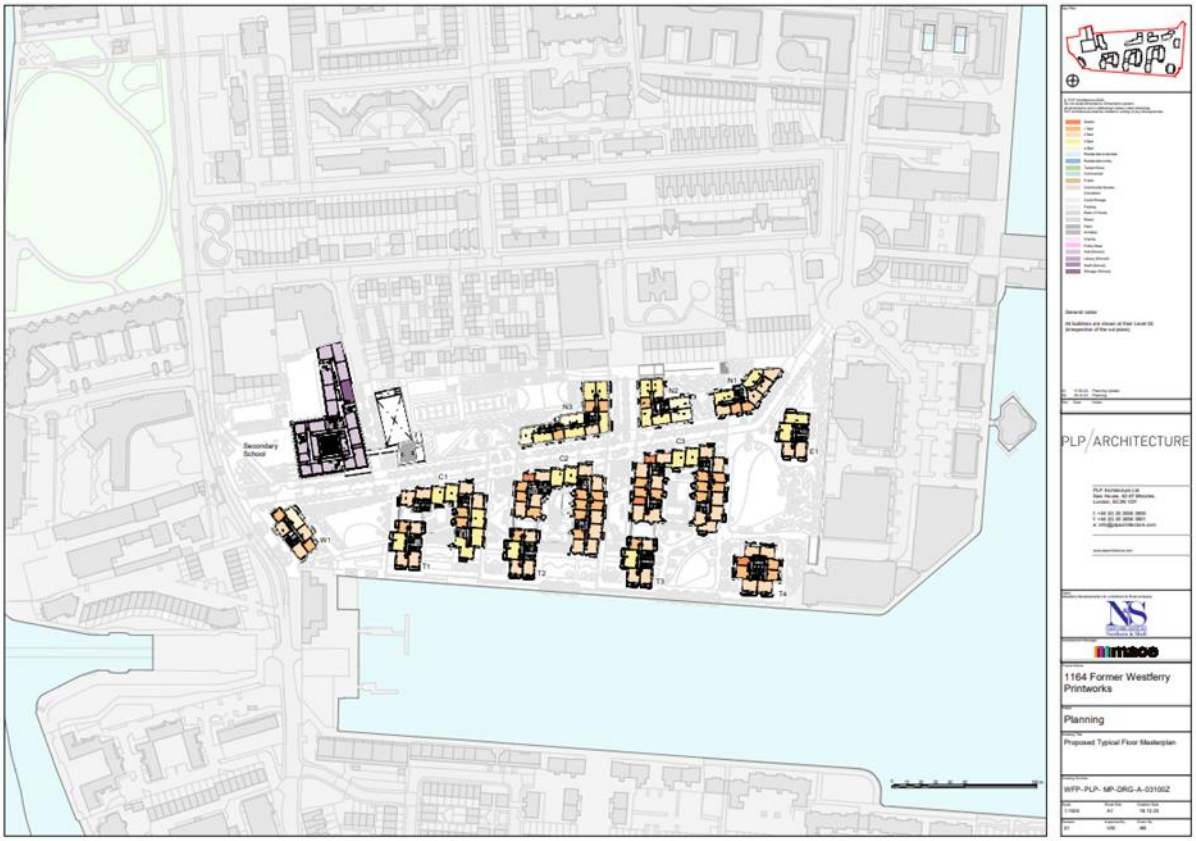
Proposed Ground Floor Masterplan



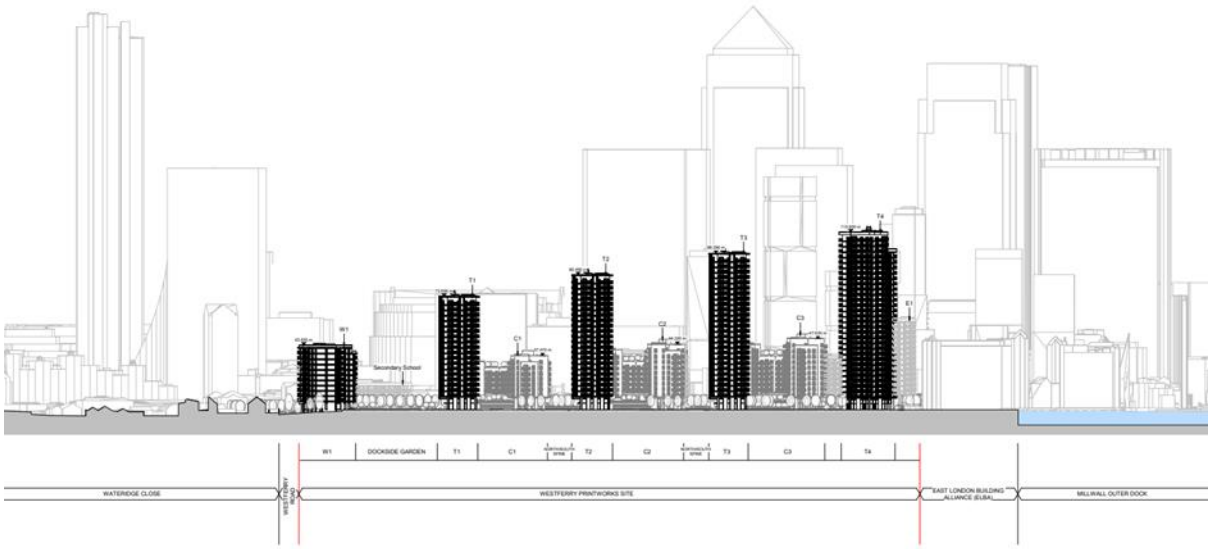
Proposed Mezzanine Masterplan

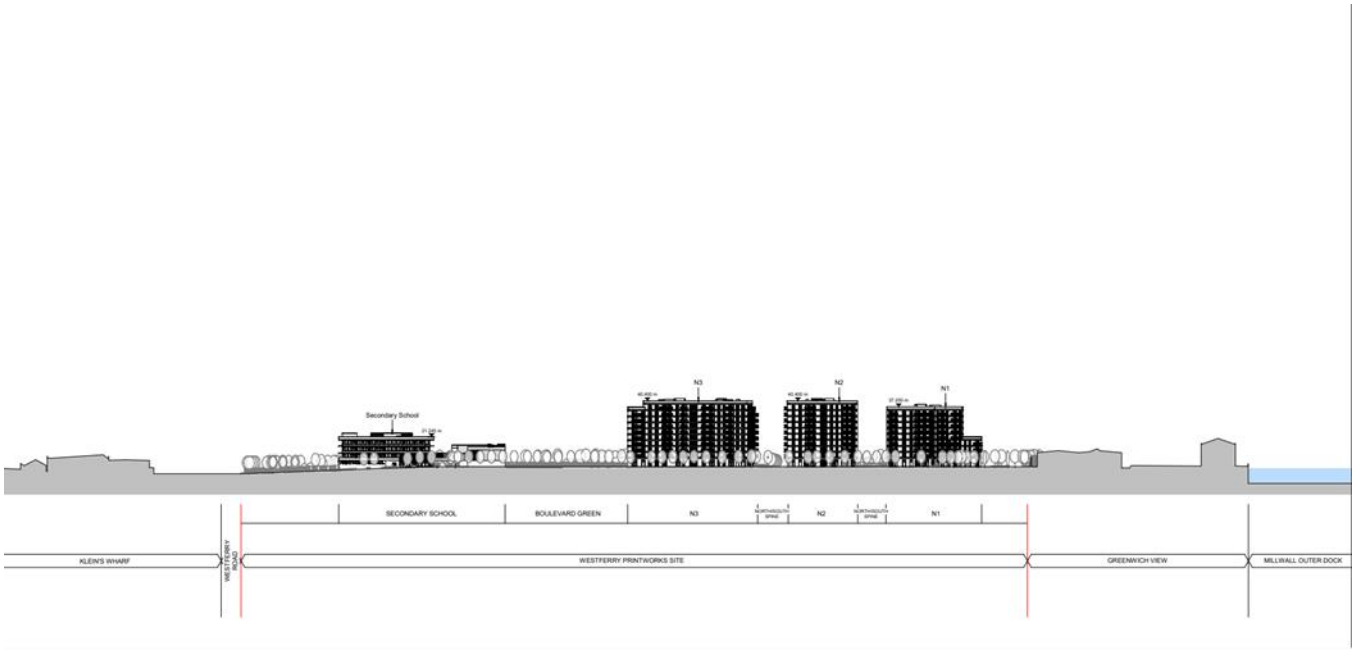


Proposed Typical Floor Masterplan

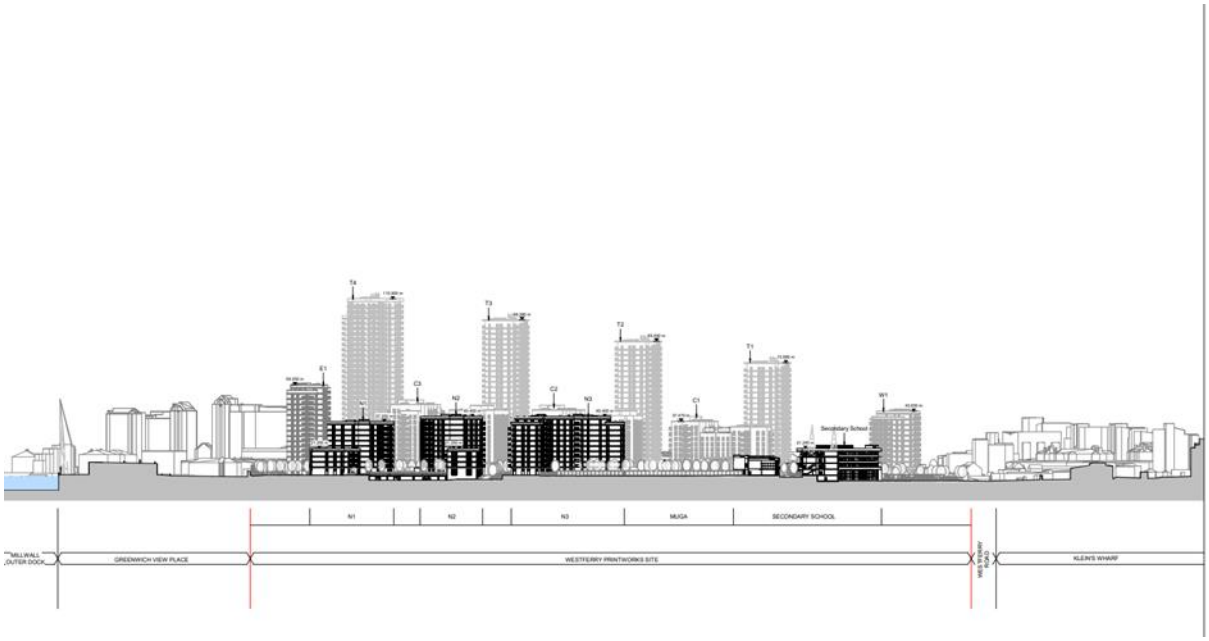


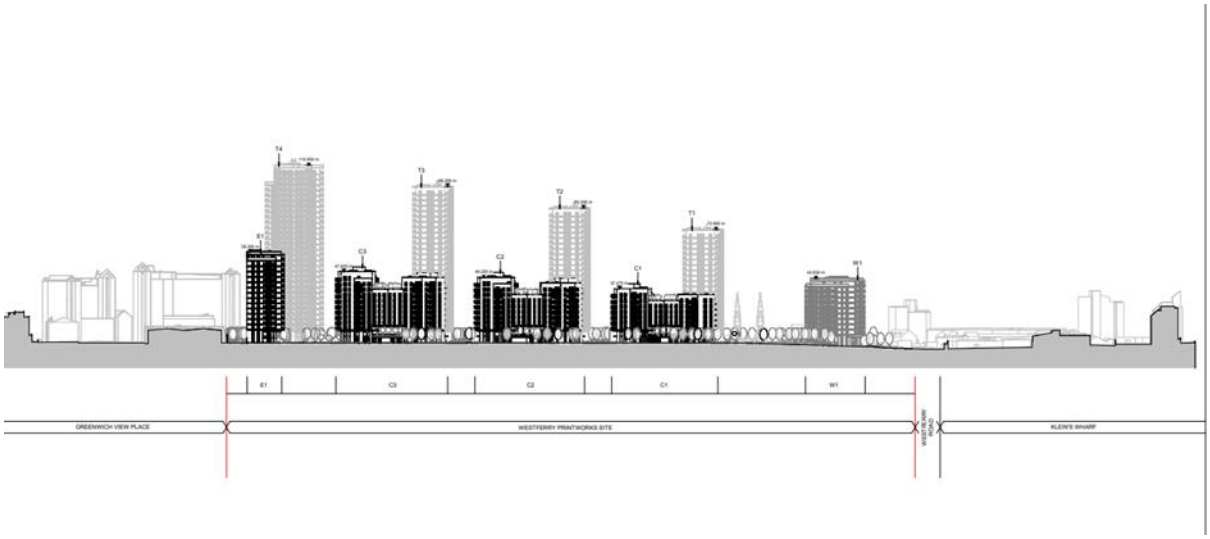
Masterplan South Elevations



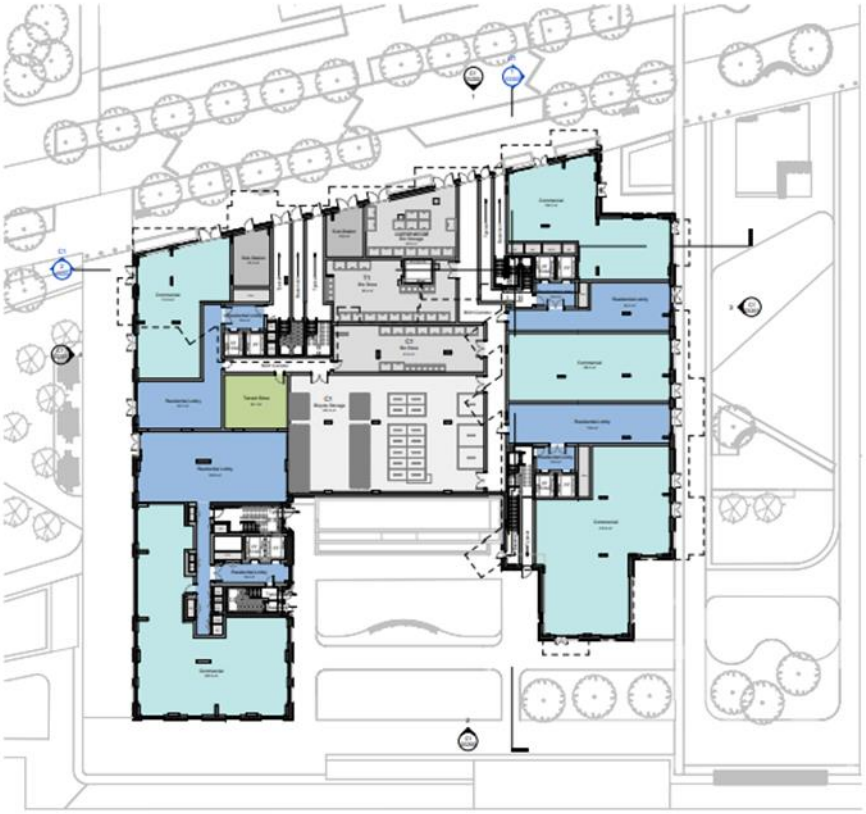


Masterplan North Elevations

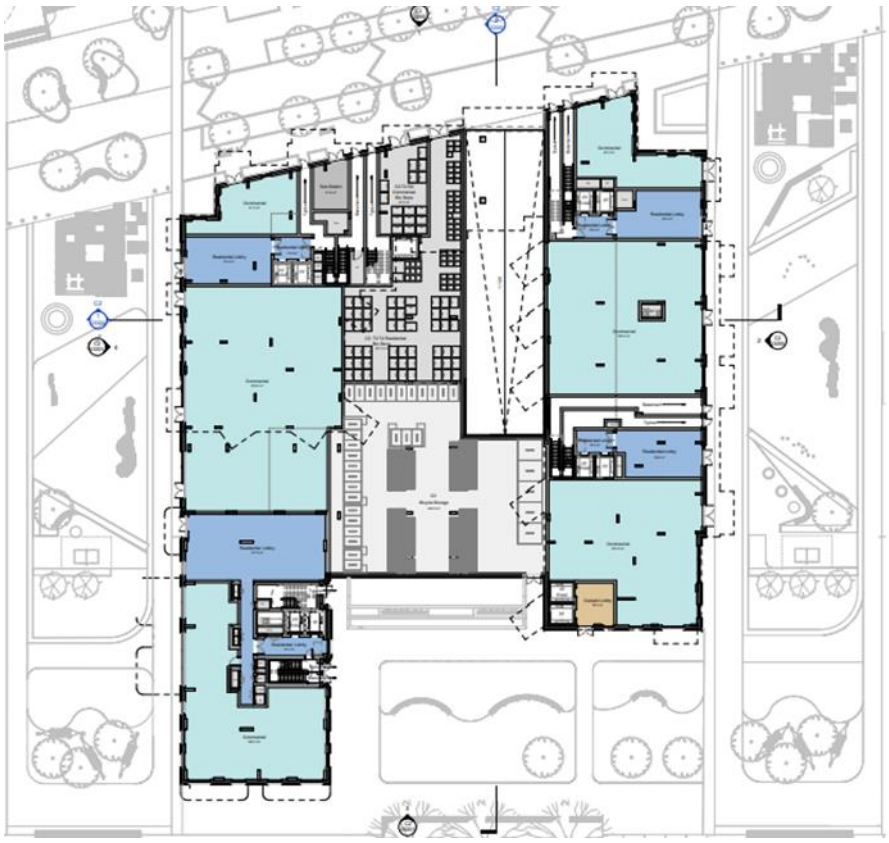


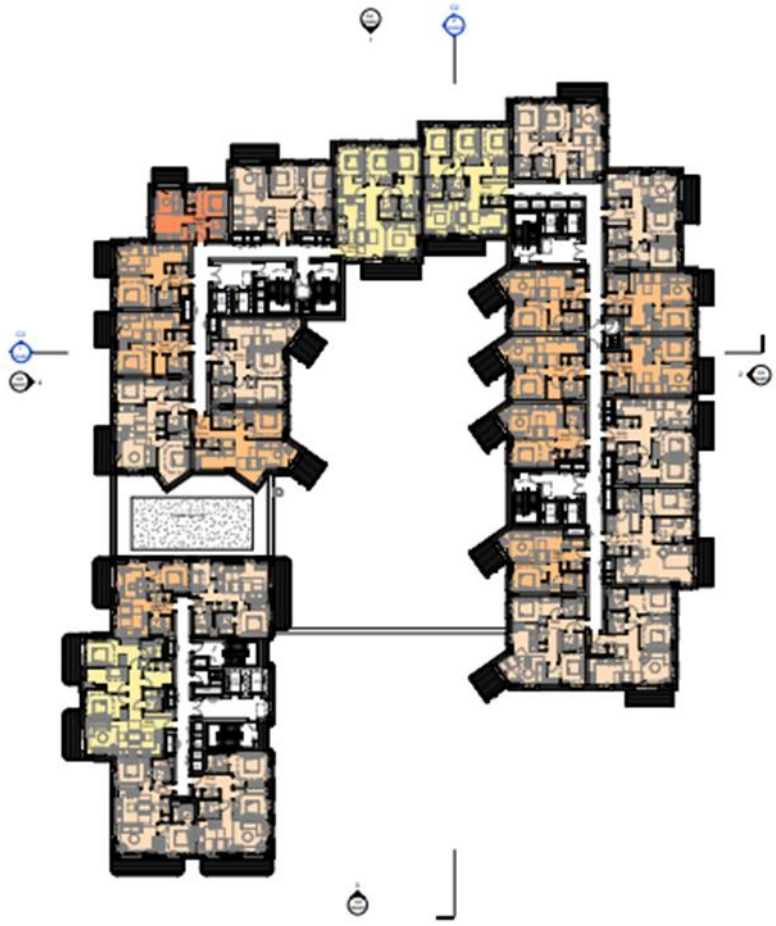


C1 and T1 Ground Floor and Typical Floor Plans

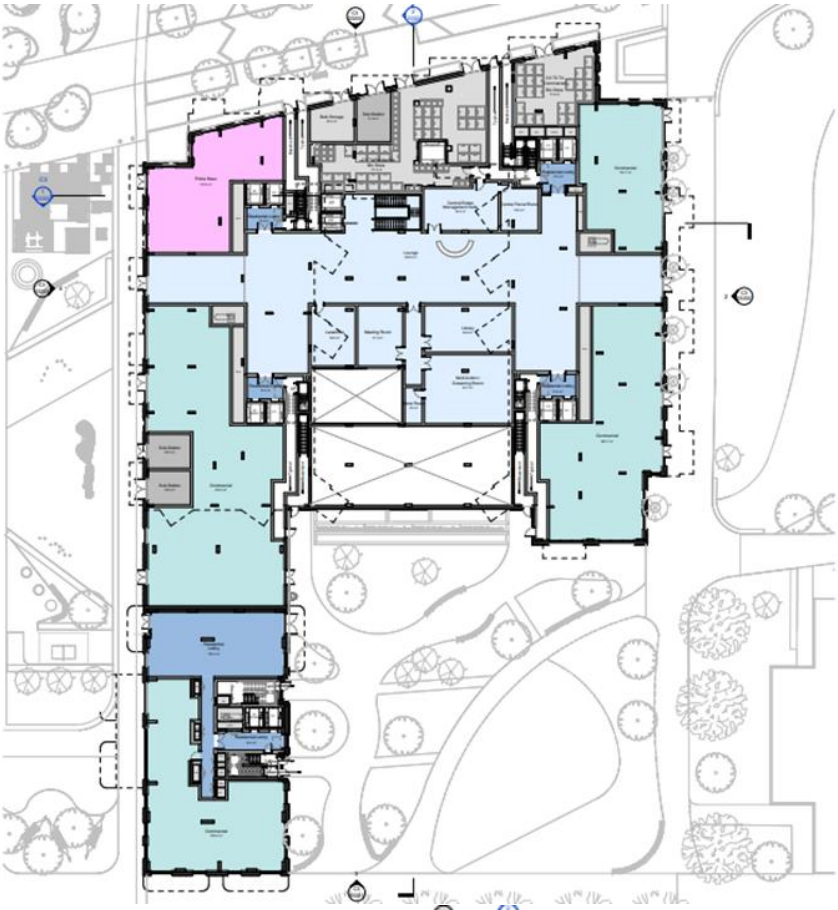


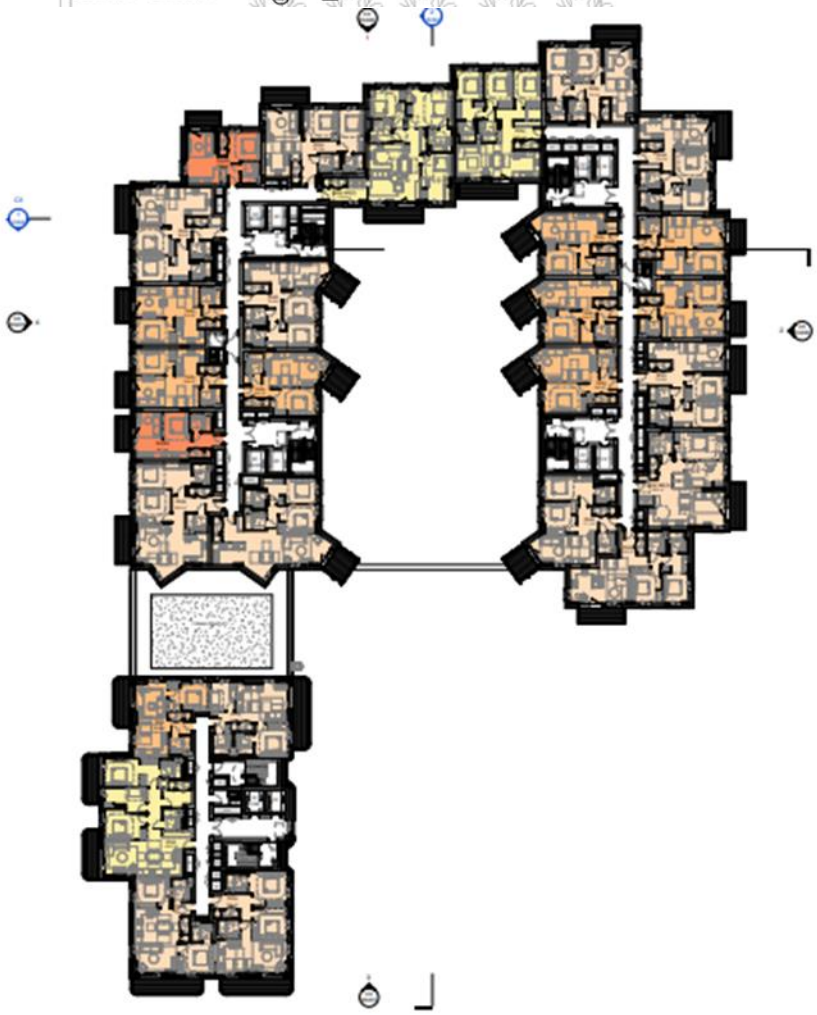
C2 and T2 Ground Floor and Typical Floor Plans



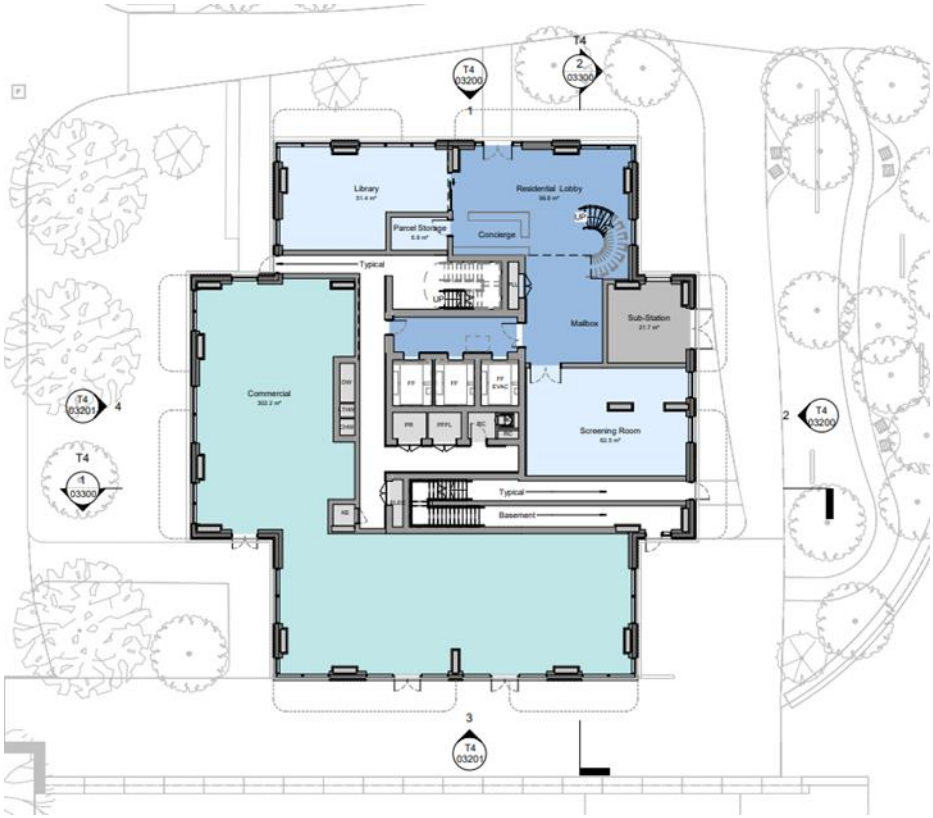


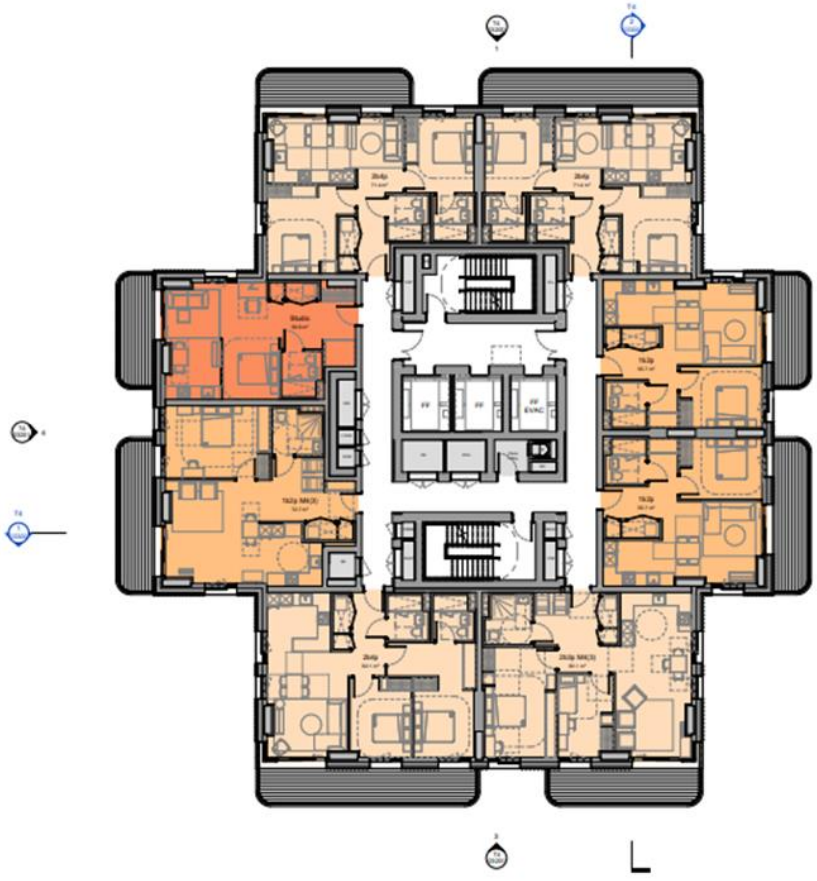
C3 & T3 Ground Floor and Typical Floor Plans



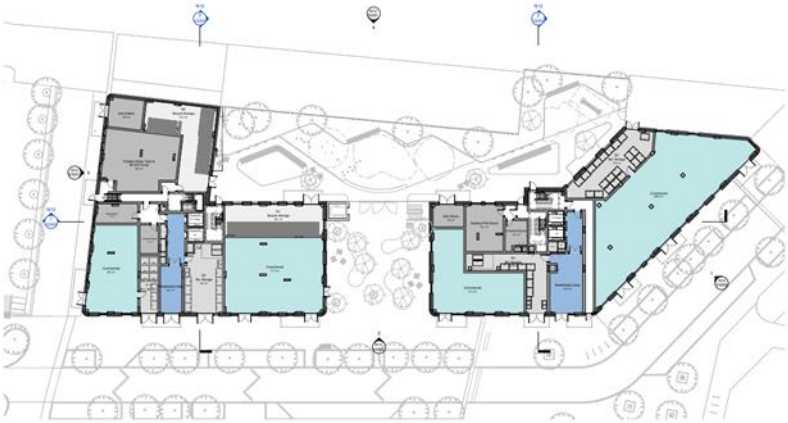


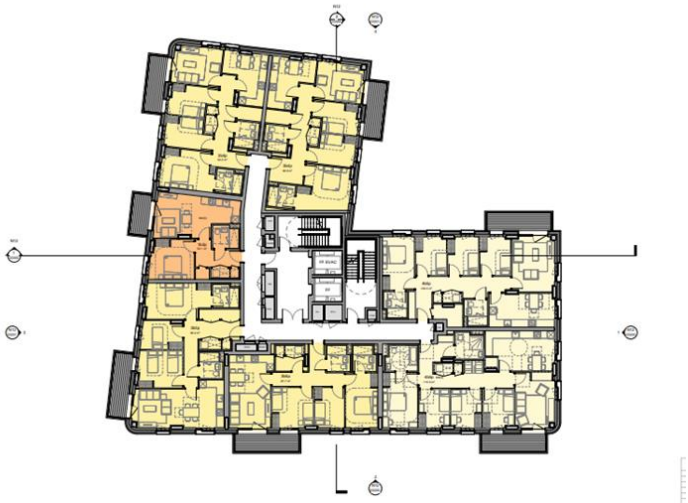
T4 Ground Floor and Typical Floor Plans



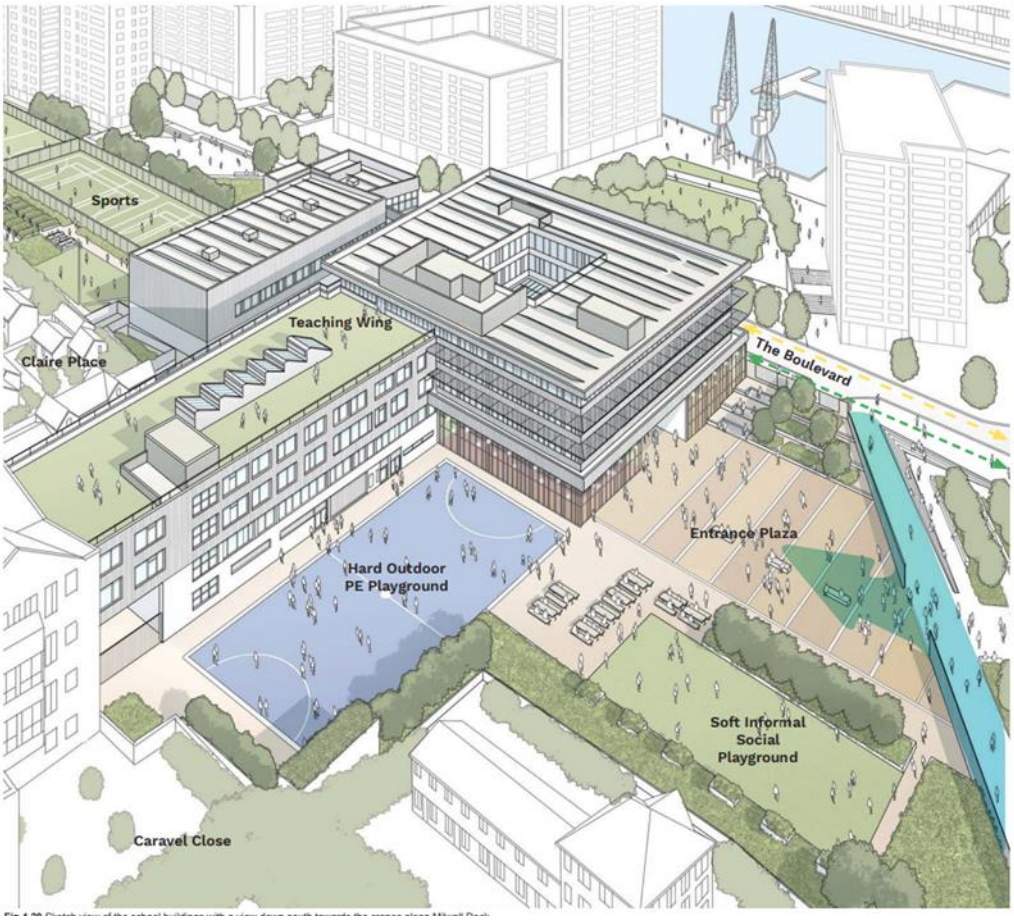


N1 and N2 Ground Floor and Typical Floor Plans





Sketch images of School



Sketch image of School and Palette of Materials

Palette of Materials

The image to the right shows how the materials will be utilised within the school facade, and how they will be layered to inform the architectural language.

1) Moulded white concrete (Reckli 2/169 Columbia)

2) Polished White Concrete Cladding

3) Glazed Curtain Walling including Doors with copper and Light Grey coated window mullions (for example KME TECU Gold) and Light Grey solid cladding panels

4) Light Grey Ventilation Louvres

5) Light Grey Acoustic Louvres

6) Copper Balusters with Glass Infill

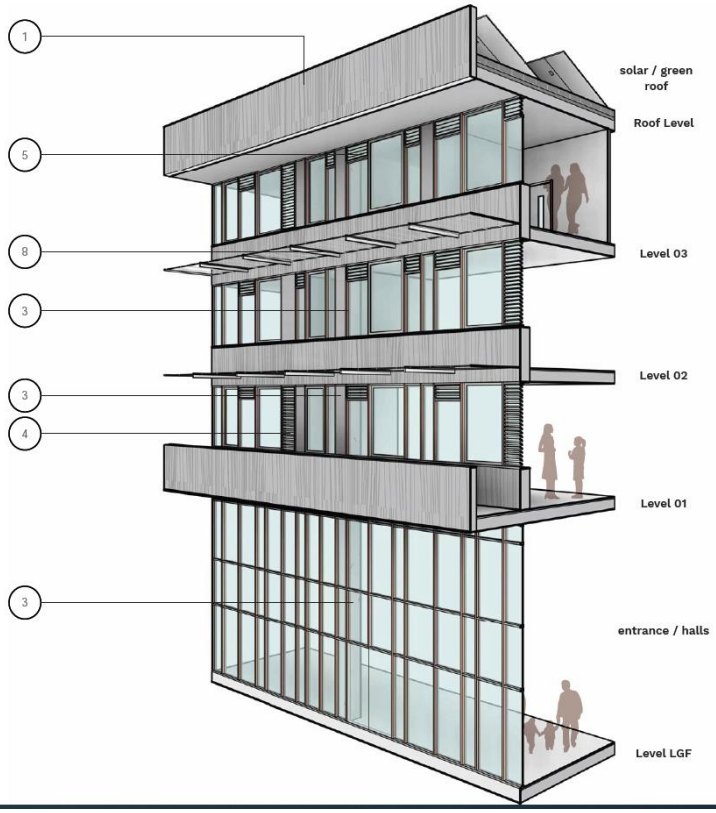
7) Light Grey Louvred Plant Room Screen

8) Light Grey Horizontal Sun Louvres

9) Light Grey Secure Gates and Fencing

10) Light Grey Solar Shading Louvres

11) Glazed Roof lights



CGI view from Lower Promenade looking East towards Promenade Place and T4

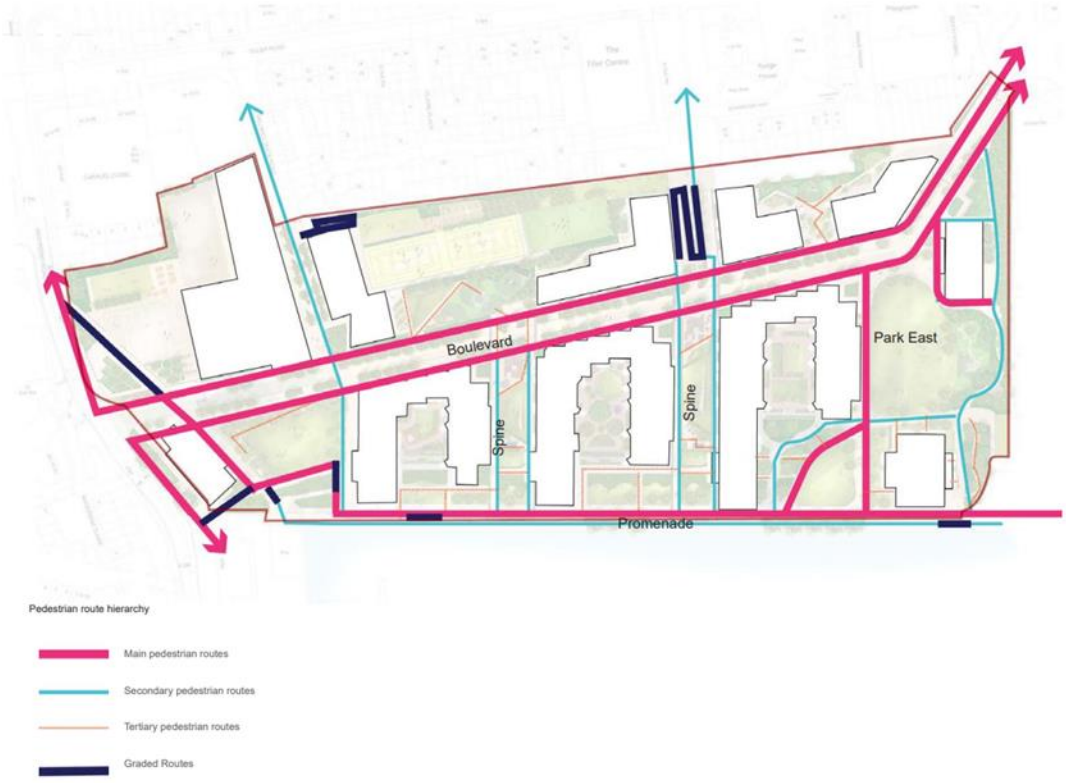
CGI view from Millharbour of building E1

CGI view of Woodland Walk

CGI view looking north along one of the North-South Spines

CGI night view from Greenwich Park

Pedetrian Route Hierarchy



Drainage Strategy

Public Realm and Open Space Hierarchy and Function

Groundfloor public open space

- Soft/recreational character areas
- Planted plaza areas
- Linear plaza/spine character area
- Quiet/reflective spaces
- Promenade
- Tree planted boulevard - pedestrian priority and low vehicular traffic (less than 2 vehicles per minute at peak times)

Communal Amenity Areas

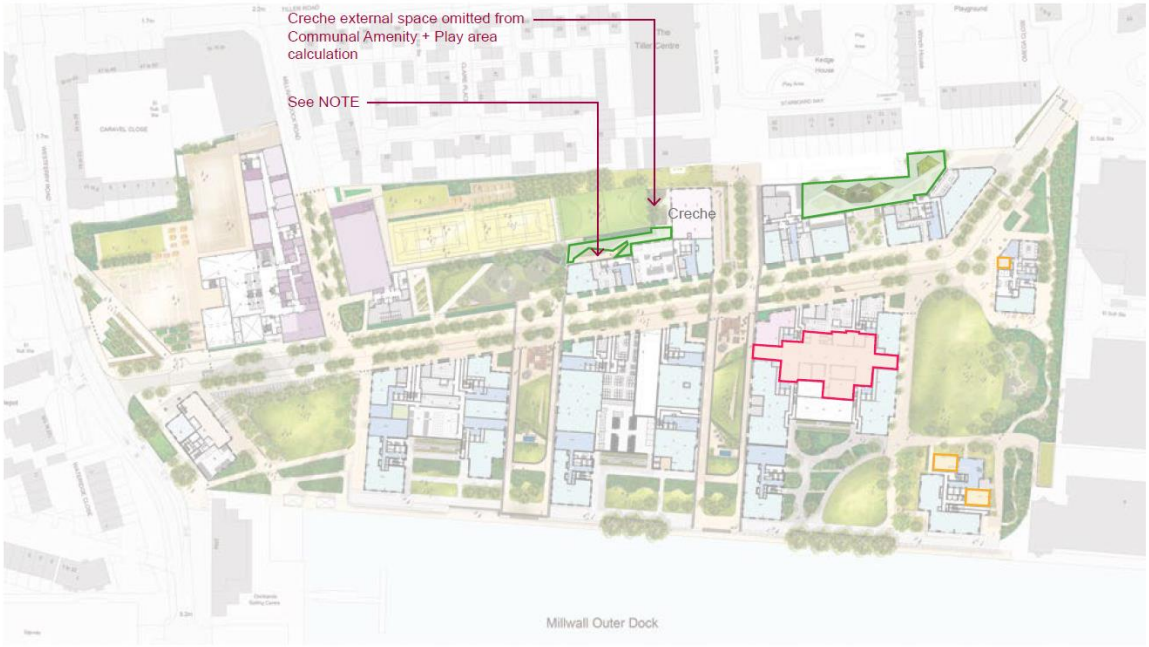


Fig 7.1 Ground Floor Communal Amenity Area

A Communal Amenity within Buildings
B Communal Amenity Shared between Buildings
C C3 Central Hub for Market units

Fig 7.2 Basement Communal Amenity Areas

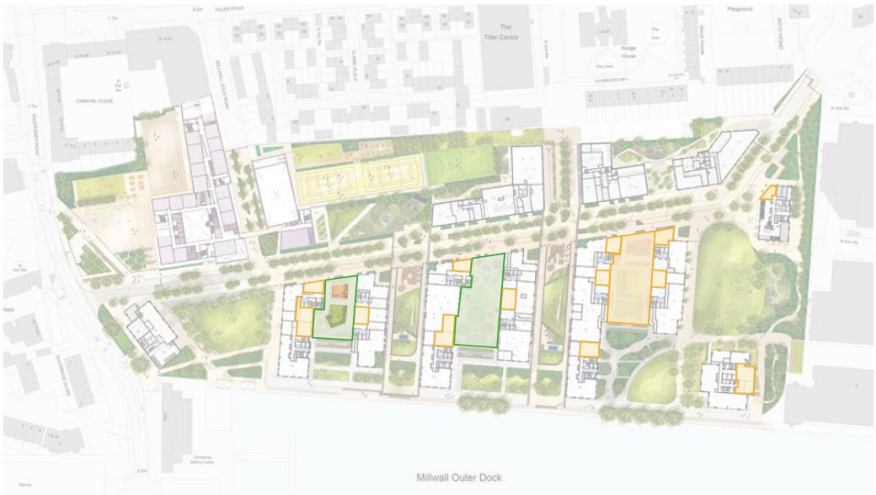


Fig 7.3 Mezzanine Communal Amenity Areas

A Communal Amenity within Buildings
B Communal Amenity Shared between Buildings
C C3 Central Hub for Market units

Communal Amenity Type	MARKET						INTERMEDIATE		AFFORDABLE RENT				
	T4	T3	C3	T2	C2	T1	C1	E1	E1	W1	N1	N2	N3
A	277.2m²	81.9m²	1,355.3m²	144.1m²	148.9m²	168.9m²	132.6m²	66.2m²		-			
B	-			1,090.4m²		431.0m²		825.5m²					
C	1,649.3m²						-						

Children's Play Space Distribution

	Planning Scheme Requirement m2 (GLA)	Planning Scheme Provision m2
TOTAL	**5,634**	**6,756**
Under 5	2166	1,551 Formal Play 922 Informal Play =Total 2473
5-11	1767	1818 Formal Play 0 Informal Play =Total 1818
12+	1701	1378 Formal Play 803 Informal Play =Total 2181
All ages playable	0	284

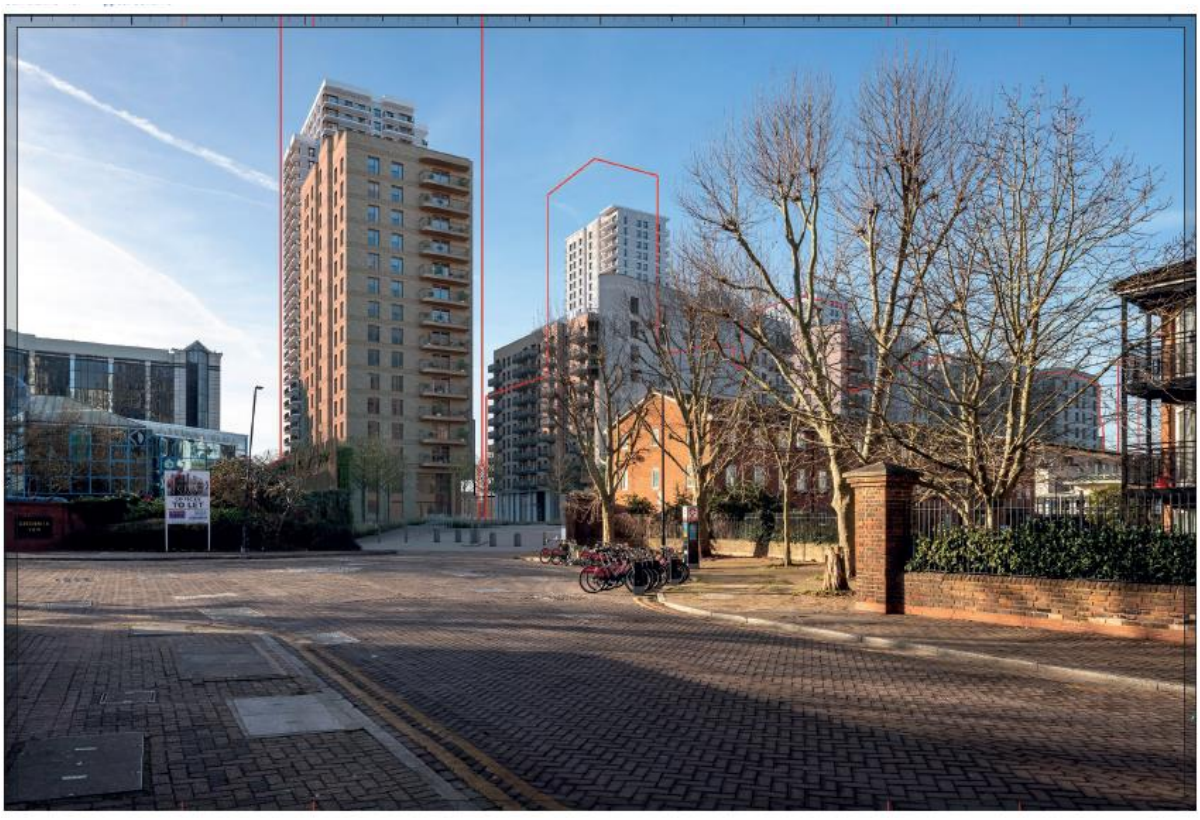
Urban Greening Factor

UGF_Calculations				
UGF Surface Cover Type Name	UGF Surface Cover Type Description	Material: Area	UGF Factor	**UG Score**
Semi-natural vegetation	(e.g. trees woodland, species-rich grassland) maintained or established on site	7351 m²	1	0.120
Intensive green roof or vegetation over structure	Substrate minimum settled depth of 150mm	2683 m²	0.8	0.035
Standard trees planted in connected tree pits	with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	7527 m²	0.8	0.098
Extensive green roof	with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket)	2305 m²	0.7	0.026
Flower-rich perennial planting	-	1875 m²	0.7	0.021
Rain gardens and other vegetated sustainable drainage elements	-	1535 m²	0.7	0.017
Green wall	modular system or climbers rooted in soil	1161 m²	0.6	0.011
Hedges	(line of mature shrubs one or two shrubs wide)	165 m²	0.6	0.002
Standard trees planted in pits	with soil volumes less than two thirds of the projected area of the mature tree	825 m²	0.6	0.008
Amenity grassland	(species-poor, regularly mown lawn)	4883 m²	0.4	0.032
Permeable paving	-	9271 m²	0.1	0.015
Total Score		39582 m²		0.385

URBAN GREEN FACTOR

Surface Cover type	Factor
Semi natural vegetation (eg. Woodland, flower-rich grassland) created on site	1
Wetlands or **open water** (semi-natural; not chlorinated) maintained or established on site	1
Intensive green roof of vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm	0.8
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO code 2014	0.7
Flower-rich perennial planting	0.7
Rain gardens and other vegetated sustainable drainage elements	0.7
Green wall - modular system or climbers rooted in soil	0.6
Hedges (line of mature shrubs one or two shrubs wide)	0.6
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	0.6
Groundcover planting	0.5
Amenity grassland (species-poor, regularly mown lawn)	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0.3
Water features (chlorinated) or unplanted detention basins	0.2
Permeable paving	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0

APPENDIX 3 - View 13: Millharbour South Cumulative View



View 13 with appeal scheme outlined in red wireline.

APPENDIX 4 - TREE SPECIES

Lower Promenade Replacement Tree Proposals

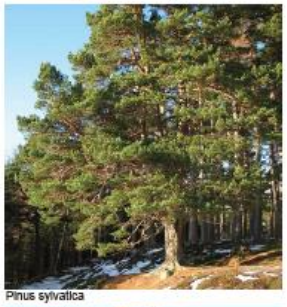

Liriodendron tulipifera


Acer campestre


Ginkgo biloba


Liquidambar

Other Species Proposed Elsewhere on Site


Pinus sylvatica


Quercus palustris


Cornus kousa


Magnolia grandiflora


Tilia europaea


Gelditsia tricanthos 'Enermis'


Populus tremula


Taxodium distichum

Amelanchier lamarckkl

Betula pendula