



DEVELOPMENT COMMITTEE

05 September 2024

Report of the Corporate Director of
Housing and Regeneration

Classification: Unrestricted

Application for Planning Permission

[click here for case file](#)

Reference	PA/24/00568/A1
Site	Empson Street Industrial Estate, Empson Street, E3
Ward	Bromley South
Proposal	<p>Demolition of existing buildings and structures, and the redevelopment of the site to provide flexible industrial floorspace (Use Class E(g)(ii)/E(G)(iii)/B2/B8), with ancillary offices, central yard space, landscaping, and other associated works.</p> <p>Retention, refurbishment and change of use of the MOT garage to provide flexible industrial floorspace (Use Class E(g)(ii)/E(G)(iii)/B2/B8) and a circular economy hub.</p> <p>This application is accompanied by an Environmental Impact Assessment.</p>
Summary Recommendation	Grant planning permission with conditions and s106 obligations
Applicant	Fabrix London Ltd
Architect/agent	Gerald Eve LLP / Haworth Tompkins
Case Officer	Oliver Cassidy-Butler
Key dates	<ul style="list-style-type: none">- Application registered as valid on 03/04/2024- Public consultation finished on 09/06/2024

EXECUTIVE SUMMARY

The application seeks full planning permission for the demolition of existing buildings and structures, and the redevelopment of the site to provide flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/B2/B8), with ancillary offices, central yard space, landscaping, and other associated works.

The application also includes the retention, refurbishment and change of the site's existing MOT garage to provide flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/B2/B8) and a circular economy hub.

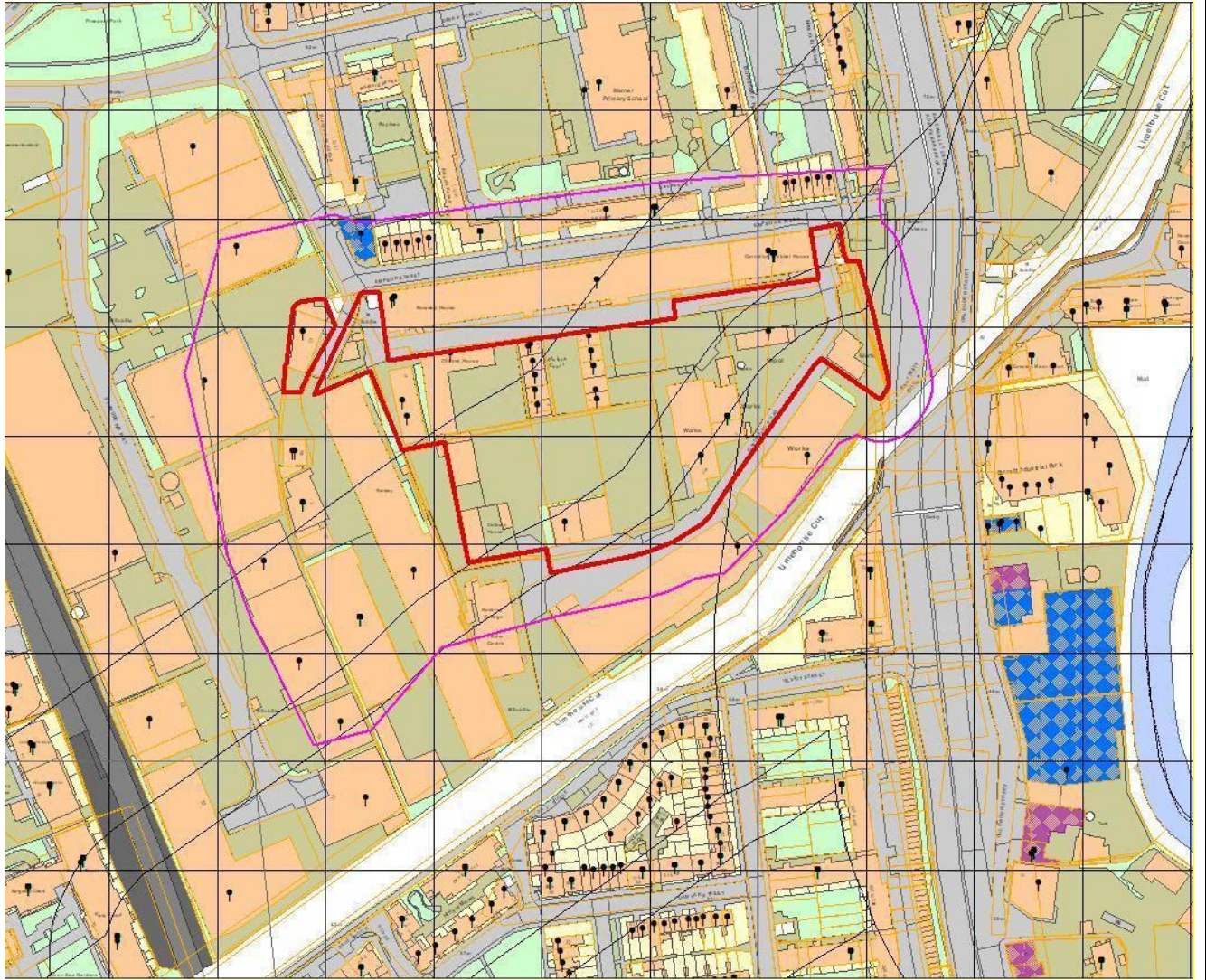
The proposed flexible land uses are consistent with those designated appropriate for London's Strategic Industrial Locations. Furthermore, the intensification of said uses is further supported in accordance with policies GG2 and E5 of the London Plan (2021), and policy D.EMP2 of the Local Plan (2020).

The project would provide 11,964sqm of employment floorspace. Of which , it is proposed that 1,198sqm would be delivered as affordable workspace, meeting the minimum provision of at least 10% of all workspace being affordable, in accordance with policy D.EMP2. The subsidised rate will be secured for a period of not less than 10 years, by way of a S106 agreement, in accordance with the LBTH Planning Obligations SPD.

The application proposes to introduce a Circular Economy Hub (CEH) to the existing MOT building. The CEH will be located within one of the two ground floor units (Unit 2), which measures approximately 122sqm (GIA). It will be serviced by a private yard to the rear of the unit, measuring approximately 84sqm.

As part of the application, it has been agreed that the Circular Economy Hub will be delivered with no rental cost to the final managing organisation, for a period of no less than 10 years. This planning benefit will be secured by s.106 agreement with the Local Planning Authority and represents an important planning benefit which will support the occupation of continued viability of the Circular Economy Hub. Not only is it envisaged that this would support local business present within the borough, but it will also help to reduce the quantum of waste products created each year.

The application is supported by an Environmental Impact Assessment. The scheme will, if permitted, have minor impacts upon the Local Transport for London Road Network (TLRN) , as well as existing active travel routes, that exist with the local area, specifically, the Limehouse Cut Tow Path. s.106 obligations have been secured to mitigate the impacts of the development, which will serve to promote and improve pedestrian and cycle access to the site, and thus reduce the development's overall impact upon the local environment.



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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/23/00568

London Borough
of Tower
Hamlets

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

Scale : 50m grid squares

Date: 8th August 2024

1. SITE AND SURROUNDINGS

- 1.1 The application site comprises approximately 19,250 sqm (4.7 Acres) of industrial use land, located within the east section of the Empson Street Strategic Industrial Location. It is bounded by; Empson Street and Empson Street Studios, to the north; The A12 (Blackwall Tunnel Northern Approach) to the east; Towcester Road, inclusive of 4 and 4a Towcester Road (Bow Bunker), Scorpio House and 17 Towcester Road (Appleton and Sons Ltd), as well as the Lime House Cut, to the South East and South of the Site. 1 Towcester Road (occupied by the Limehouse Art Foundation), and the rear of a series of vacant warehouses located on Brickfield Road to the west; as well as the rear of several large warehouses situated on 7 St. Andrews Way.
- 1.2 The application site comprises of a number of low-rise, dilapidated industrial buildings, many of which are vacant. The existing buildings situated within the application site provide 6,042sqm GIA industrial floorspace; with a low-density plot ratio (amount of the site occupied by buildings) of approximately 32%. In the northwest corner of the site lies an unoccupied former MOT centre, which the current application seeks to retain.
- 1.3 The application site is neither locally nor statutory listed. It does however sit adjacent to the Limehouse Cut Conservation Area, which includes the Limehouse Cut's canal system, a row of disused warehouses, and Limehouse Arts Foundation, which run adjacent to the west edge of the application of the site.
- 1.4 Although no locally or statutory buildings are included within the site, it is noted that the Grade II Listed Building, *Dowgate Wharf P B Burgoyne and Company Limited Warehouse*, is situated approximately 126m to the south east of the site; which sits adjacent to a series of locally listed buildings which populate Gillender Street. Additionally, to the north of the site by approximately 35m lies the Locally Listed Beehive Public House.
- 1.5 The application site falls within the Empson Street Strategic Industrial Location (SIL). This designation plays an important sub-regional industrial, warehousing and waste management role serving not just the borough but other parts of central London. Housing is not suitable in this location due to potential conflict with existing and future industrial uses.
- 1.6 The site achieves a PTAL (Public Transport and Accessibility Level) rating of 3-4; which is moderate to good, on a scale from 0-6b where 0 is very poor access to public transport, and 6b is excellent access to public transport.
- 1.7 To the south of the site lies the Limehouse Cut, which forms a Site of Importance for Nature Conservation (SINC). Additionally, it should be noted that the site sits within the Tower Hamlets' Green Grid Buffer Zone.
- 1.8 The site is within the designation of; CIL Zone 3, Flood Zone 1. Additionally, the east side of the site falls within the borough's designated area of poor air quality.

2. PROPOSAL

- 2.1 The application seeks full planning permission for the demolition of existing buildings and structures, and the redevelopment of the site to provide flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/B2/B8), with ancillary offices, central yard space, landscaping, and other associated works.

The application also includes the retention, refurbishment and change of the site's existing MOT garage to provide flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/B2/B8) and a circular economy hub.

Block	Unit	Total Proposed NIA (Including Mezzanine)	
		(sqm)	(sqft)
North Block	Unit 1	1,130	12,163
North Block	Unit 2	913	9,827
North Block	Unit 3	913	9,827
North Block	Unit 4	683	7,352
North Block	Unit 5	683	7,352
North Block	Unit 6	1,525	16,415
South Block	Unit 7	1,824	19,633
South Block	Unit 8	1,532	16,490
South Block	Unit 9	1,352	14,553
South Block	Unit 10	1,009	10,861
TOTAL		11,564	124,474

Table 1.1: Unit sizes provided within industrial warehouse units.

- 2.5 Within the MOT Centre, it is proposed that the building be separated into 4 units. Units 1, 3 and 4 will be provided as affordable workspace. Unit 2 will be provided as a circular economy hub. The size of units is outlined below in table 1:2 below:

Room Name	Total Proposed GIA	
	(sqm)	(sqft)
Unit 01	78	840
Unit 02	122	1,313
Unit 03	17	183
Unit 04	15	161

Table 1.2: Unit sizes provided within the MOT Building.

Additionally, it is noted that a small security cabin is proposed to be located in the north west corner of the site, immediately to the south east of the MOT Building. The Security building will measure 4.2m (width) x 19.5m (length) x 3.3m height. It will feature signage with place branding on its rooftop. This signage will stand to a

maximum height of 4m (above roof level). Although tall, the signage is slender in appearance.

RELEVANT PLANNING HISTORY

Planning History relevant to the application site

- 3.1 The site comprises of many individual buildings and units and thus has an extensive planning history. For this reason, officers have summarised the site's planning history to showcase only those applications which are deemed relevant to the current application, below.
- 3.1 PA/23/02407: Request for an 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 comprehensive redevelopment of the site to include demolition of a majority of buildings on site and site enabling works, and development of flexible industrial facilities approximately 11,000sqm GEA (Use Class B2/B8/E(g)(iii)) comprising of approximately 8-10 industrial units arranged in 2 blocks with flexible internal layouts, retention and reuse of former MOT garage of approximately 350sqm GEA for community uses, flexible and affordable workspaces, potential circular economy hub, potential site management and security offices. | Empson Street (Bromley by Bow Industrial Park), London, E3 3LT. Scoping Opinion Issued – 07 December 2023.
- 3.2 PA/12/02972: Internal and external alterations for the division of the existing building into 24 workshop/studios (non-residential) with ancillary office and storage space, and external alterations for alterations to windows, doorways and alterations to external stairs. | 1 Empson Street, London, E3 3LT. Permitted – 23 January 2013.
- 3.3 PA/05/00050: Partial redevelopment of site to create 4 units (Class B2) and a cement colourant plant. | Unit 1 Lusty Industrial Est Empson Street and 3 Towcester Road, Empson Street, London, E3 3LT. Permitted – 05 April 2005.
- 3.4 PA/03/01434: Creation of an additional floor and the division of the building into 8 separate units each providing workshop space with ancillary office and storage space, changing the use of the building from warehouse (B8) to light industry (B1). | 1 Empson Street, London, E3 3LT. Permitted – 21 November 2003.
- 3.5 PA/03/00545: Change of use and conversion of the ground and first floor warehouse and office accommodation 8 live/work units. | 1 Empson Street, London, E3 3LT. Refused – 27 May 2003.
- 3.6 PA/01/01050: Demolition of existing brick built office to provide for a temporary two storey office building at first floor with parking below and a new vehicle access. | Unit 1, Lusty Industrial Estate, Empson Street, London, E3 3LT. Permitted – 20 September 2001.
- 3.7 PL/89/00122: Refurbishment for light industrial and warehousing purposes with ancillary showroom and office accommodation. | 1 Empson Street, London, E.3. Withdrawn by Applicant – 21 September 1990.
- 3.8 PL/88/00041: The installation of a asbestos waste skip container and decontamination units. | Clifford House Towcester Road London E3. Permitted – 02 December 1998.

- 3.9 PA/87/00846: Erection of 12 general industrial units. | 1 Empson Street, London, E3 3LT. Permitted – 04 July 1998.
- 3.10 PA/86/00870: Redevelopment to provide ten individual units and ready mix concrete depot. | 1 Empson Street, London, E3 3LT. Permitted – 23 August 1988.
- 3.11 PL/86/00001: The redevelopment to provide ten individual units and ready mix concrete depot. | 1 Empson Street, London, E3 3LT. Permitted - 23 August 1988.
- 3.12 PA/86/00741: Use of the site for the storage and distribution of industrial air products and erection of a single storey filling shed and portakabin office. Permitted – 13 May 1986.

Planning History relevant to the local setting

- 3.13 PA/24/00974: Redevelopment of the site to provide a building comprising a self-storage facility (Class B8), together with associated car and cycle parking, refuse storage, landscaping and access arrangements. | 4 and 4A Towcester Road, London, E3 4ND.

Pre-application advice meetings, relevant to the current application

- 3.14 PF/23/00104: The application proposes to redevelop the site to provide a creative light-industrial campus. The proposals can be split into two primary sections.

The first relates to the centralised industrial units, comprising of two rows of industrial warehouses, positioned on opposing sides of a centralised access route. The warehouses will be split to provide 9 units and approximately 11,770sqm GEA (including mezzanine level).

The second section of the site pertains to an existing former MOT garage, positioned within the site's north-west corner. It is proposed that the existing structure be retained and further developed to provide approximately 350sqm GEA of affordable workspace and a circular economy hub.

- 3.15 *Officer's response:*

The proposals have continued to develop in a positive manner. The proposed redevelopment of the Empson Street Industrial Site to provide a creative campus, which provides a mixture of light industrial, and employment uses, alongside a circular economy hub are supported.

The proposals are well considered and of a high standard of design. Further work is required to ensure that the landscaping strategy and biodiversity improvements are optimised. Likewise, the proposed waste management and transport strategies are progressing well, and do not pose any major concerns at this stage in time.

The contribution of affordable workspace does require further consideration. At present we are not convinced by the intent to concentrate the affordable workspace across three floors in Unit 09, in a manner which would not be replicated elsewhere within the development. Furthermore, you are advised to reconsider the rate of discount provided and the length of time for which it is proposed. With consideration for the redevelopment of the Aberfeldy Estate, local business will be presented with alternative low-cost affordable workspace, and thus to ensure the site's competitiveness you are encouraged to meet said rate of discount.

4. PUBLICITY AND ENGAGEMENT

4.1 The Council notified 334 neighbouring owners/occupiers by post. The application was also publicised online and in the local press.

4.2 Two Site Notices were published on 09 May 2024. One Site Notice was posted at the east entrance to the Empson Street Industrial Site, and the second was posted at the western entrance.

4.3 A total of 6 letters of representation were received in response to the proposals. 5 letters were received in support of the proposals, and 1 was received in objection.

4.4 Below is a summary of representations received from the public, in support of the proposals:

- If traffic is properly managed on Empson Street, the industrial development should uplift the area.
- The community has been properly consulted throughout, and engagement should continue if permission is granted.
- The proposals would be a massive improvement to existing factory setting with broke down infrastructure. Hopefully it improves the areas outlook and liveability for local residents.
- The proposals will if permitted improve the aesthetic quality and character of the local area.

4.5 Below is a summary of representations received on behalf of Poplar HARCA:

- Having attended the applicant's consultation events and having viewed the plans, Poplar HARCA support the current proposals.
- The introduction of a new, flexible, best in class industrial campus aimed at startup businesses and with workshops, maker spaces and studios will be a welcome addition to the area and would significantly improve the Empson Street site.
- The inclusion of affordable workspace will positively contribute to local employment.

4.6 Below is a summary of representations received in objection of the proposals:

- Concerns are held that the construction phase of development may result in disruption, lasting up to 2 years, which would prevent access for businesses located to the south of Empson Street Industrial Estate, along Towcester Road.
- Any disruption to the existing 24 hour-a-day access arrangements to the site would adversely affect local businesses.

5. CONSULTATION RESPONSES

External Consultees

Cadent Gas

- 5.1 No objections. Informative must however be attached should consent be granted.

Cadent Gas Ltd own and operate the gas infrastructure within the area of the development. There may be a legal interest (easement and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.

Canal and River Trust

- 5.2 The proposed development would be a little way from the Trust's waterways, would not have direct impact.

It is however noted that the Transport Assessment identifies the Limehouse Cut towpath as a green space within walking distance from the site, which also provides a car-free walking and cycling route.

- 5.3 The site is within the Green Grid Buffer Zone in Tower Hamlets Local Plan Policies Map, and paragraph 13.46 of the Local Plan "Development sites located adjacent to or in close proximity to the green grid (i.e. within the Green Grid Buffer Zone, (as shown on the Policies Map) – including the Lee Valley Regional Park, Lea River Park, Thames Path Nation Trail and canal towpaths – will be required to contribute to linking and improving the connectivity of green grid links in accordance with Green Grid Strategy and the May of London's All London Green Grid Supplementary Planning Guidance.

The application form states that the number of employees on the site will increase from 55 to 232 full time equivalent, and it is likely, particularly given that parking spaces are to be reduced on site from 26 to 14, that many employees will travel to the site via walking or cycling along the local towpath network or make use of this local amenity during breaks.

The Canal & River Trust consider that £60,000 would be a reasonable contribution towards local towpath works to support active travel to and from the development, and to mitigate the impacts of additional users.

GLA

- 5.4 No comments provided.

Historic England - GLAAS

- 5.5 The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluations being undertaken prior to determination, in this case consideration with the nature of the development, the archaeological interest and/or practical constraints are such that officers consider that a two-stage archaeological condition could provide appropriate safeguard.

LLDC

- 5.6 No comments provided.

LFB

- 5.7 London Fire Brigade note that access is provided >15% of the respective elevation as recommended under BS 9999 2017. Please ensure that all parts of the 15% perimeter proposed for each commercial unit is within 18m of the fire appliance parking position, with pedestrian access to a door giving access to the interior of the building. Reference should be made to clause 21.2 and Figure 26 of BS 9999: 2017.

Natural England

- 5.8 No objection.

TfL

- 5.9 No objections, having received further clarification from the applicant team. Conditions and s.106 obligations should however be secured, should planning permission be granted. Further details outlined below.

Site description

The site is to the south of Empson Street and is bounded to the north, west and the south by other industrial uses, and to the east by public realm adjacent to the A12. The nearest section of the Transport for London Road Network (TLRN) is the A12 Blackwall Tunnel Approach Road which is accessed via Devas Street / Twelvetreets Crescent approximately 400 metres from the main highway access to the site.

The closest stations are Devons Road on the Docklands Light Railway (DLR), approximately 300m to the west of the site and Bromley-by-Bow on the District / Hammersmith & City line approximately 350m north of the site. There are two bus stops within walking distance of the site, on A12 and Devas Street, served by the D8 and 323 services respectively. The D8 southbound stop is accessed by a subway below the A12. The site records public transport accessibility levels (PTALs) of 3-4 on a scale 0-6b, where 6b is the highest. A Mayor of London cycle hire docking station is 400m to the north of the site.

Trip generation and mitigation

The majority of all vehicles, and all HGVs are predicted to access the site along Devas Street where there is a link onto the A12 providing access for vehicles (pedestrian and cycle connectivity is addressed below).

The majority of traffic would access the site via A12 rather than the immediate local road network, which helps ensure that impacts on local highways would be limited, however impacts on Empson Street and Devas Street to improve conditions for all users would be supported, and where physical works should be secured through a S278 or other appropriate planning mechanism.

The trip generation profile for the operational use shows that trips are expected across the day, rather than in a tidal AM / PM peak pattern, the most intensive period for vehicle trips would be during the middle of the day. The assessment shows that would be a net trip generation increase:

- AM 3 hour = +90 (out of 663) two way trips by car driver / passenger and motorbike
- PM 3 hour = +62 (out of 479) two way trips by car driver / passenger and motorbike

The effect on Devas Street for example has +33 in the AM 3 hour peak and +23 in PM 3 hour peak, on top of 2030 future base respectively 2,522 and 3,168, so an increase of +2.6% and +1.4%.

Although the applicant considered that this a “very minor increase in traffic flow as a proportion of the future baseline traffic” and in line with typical daily variations in traffic flows, there will be a cumulative impact from this, and other emerging and live sites (e.g. Teviot Estate to the south), where mitigation needs to be secured to promote active travel and to avoid significant impact on local and strategic highway networks.

TfL considers that mitigation towards local connectivity should be prioritised from this site rather than a mitigation towards potential significant highway interventions which will need to continue to be assessed and secured in the A12 corridor. There are potential improvements to local connectivity which form part of wider approach to west-east strategic connectivity which should be addressed in line with London Plan policy and emerging Leaside AAAP Policy. The Devas Street / Twelvetrees Crescent highway axis does have very limited pedestrian and cycle provision, and west-east pedestrian and cycle routes need to use other routes and north-south routes promoted to avoid the A12. There are two particular potential connectivity interventions relevant to this site, besides any other locations which Tower Hamlets may be aware of on the local highway network.

1. Empson Street A12 Subway. The ATZ assessment did not include this subway, which is the nearest to the site and would connect to the southbound D8 bus stop (also proposed to be served by another extended route towards Leven Road), and to existing and emerging residential sites in the vicinity of the site. Ambience improvements to flooring, tiles and lighting would improve conditions for future occupiers of the site and would support west-east connectivity and in the interests of personal safety. A S106 contribution of £120,000 towards these works would meet Regulation 122 tests to be directly related to the site and reasonable and justified compared to other sites and secured S106 agreements. The options for delivery can include that TfL would commission the work to a contractor for the area, or that the applicant carries out the work themselves if there were to be any other highway or public realm works between the site and the subway.
2. Limehouse Cut to the south of the site has a shared cycle pedestrian path on its south side and connects from Limehouse to the west to the River Lea and Bow Back rivers to the east. This route is also likely to be a well-used walking and cycling route by occupants of and visitors to the site and facilitate deliveries and trips avoiding the local and strategic highway network. The views of Canal and River Trust should be sought for the likelihood and scope and an amount for such an intervention and its delivery, and there would be the potential for works to the towpath which may facilitate routes in the medium to longer term.

The proposed impact on the local and strategic highway can be mitigated by contributions to other measures to support active travel and west-east connectivity in the Lower Lea Valley and make this development acceptable in planning terms in line with London Plan policies T2 and T4.

Car Parking

The justification for standard car-parking, (where the starting point should be car free, compared to office standards in an Opportunity Area). The applicant response refers to shift working patterns, employees of trades operations visiting other sites, local deliveries.

One mitigation to justify the provision of active electric vehicles spaces is to support the increased use of a higher proportion of sustainable electric vehicles and micro-vehicles. The key policy driver towards sustainable distribution facilities is the London Plan. Policy T7 states that new distribution facilities should be supported, provided that they enable sustainable last-mile movements, including by cycle and electric vehicle. Similar schemes in neighbouring boroughs, have secured a commitment within the Heads of Terms where all outbound deliveries by B8 users will occur via a 100% sustainable vehicle fleet within 5 years of operation. Sustainable vehicles are defined as electric light vehicles, e-cargo bikes, and cargo bikes. A commitment to these measures and targets to be met would be considered positive and in line with the intentions of the London Plan.

Appropriate planning mechanisms are also required seeking:

- Confirmation of number of car parking spaces and disabled persons parking spaces and electric vehicle active and passive provision.
- The submission of a car parking management strategy
- Obligations including a travel plan and monitoring
- Appropriate restrictions to ensure that these spaces are used for operational purposes only and not for commuter vehicles, and
- Occupiers cannot apply for on-street parking permits in the adjacent controlled parking zone.

Cycle Parking

The amendment to the design to install bollards to reduce the risk of collision between large vehicles and parked bicycles is supported. These free-standing cycle spaces would also act as a suitable area for cargo bike deliveries to and from the site. Further information on cargo bikes is available here: <https://content.tfl.gov.uk/tfl-cargo-bike-action-plan-2023-acc.pdf>. A planning condition should be secured to confirm the provision of cycle parking and also for changing facilities and showers and storage in line with London Plan Policy T5 and London Cycle Design Standards.

Internal Consultees

LBTH Arboricultural

- 5.10 LBTH Arboricultural Officers are happy with British Standard categorisations given to each tree and the proposed methodology for all retained trees.

Officers have no objection to the removal of T20, T14, G16, T17, S18 and S19 and believe their loss can be suitably mitigated by the proposed on-site planting.

Where the removal of a tree is agreed with LBTH, the following mitigation is required; a minimum net gain of 2:1 for any trees removed and these are to be planted with a stock size of Semi Mature in line with BS 3936. Evidence of viability to plant upon completion of the development will also need to be submitted, including consideration of both current and proposed underground utilities and service runs. Planting locations should be chosen to mitigate the amenity impact any tree removals will have on the surrounding area and should also consider post development pressures, such as excessive shade and litter once fully established. Tree species will preferably be native to the UK and of a suitable size, shape and form to allow them to reach their intended proportions without significant or regular pruning.

Condition should be applied to secure the submission of a tree planting methodology in line with BS 8542 describing the process for planting and maintaining you trees that will result in them successfully establishing in the landscape.

LBTH Biodiversity

5.11 No comments provided.

LTBH Employment

5.12 During the pre-application process, concerns were raised with respect to the provision of affordable workspace provision, in terms of the extent to which discounted rates were applied to the workspace: citing, that recent LBTH had been successful in securing greater levels of discount for large scale developments, located within the local area.

Additionally, concerns were raised in terms of the overconcentration of affordable workspace, within Unit 10, when compared to the wider estate.

5.13 Whilst the concerns regarding the proposed rate of discount for the affordable workspace remain, it should be noted that the scheme does meet policy requirements. Furthermore the applicants willingness to provide the Circular Economy Hub at a nil rent for no less than 10 years is recognised as an important planning benefit associated with the scheme.

5.14 If permission is to be granted, it is recommended that the below s.106 contributions be secured in accordance with the LBTH Planning Obligations SPD.

- Construction Phase Skills and Training: £47,944.00
- Local Enterprise: 20% of total value of contracts
- End Use Employment: £134,706.95
- Apprenticeships: x5 apprenticeships

LBTH Energy Efficiency and Sustainability

5.15 The submitted Energy Assessment (Watkins Payne – March 2024) sets out the proposals to reduce energy demand through:

- energy efficiency measures – thermal fabric performance level are set out
- efficient delivery of heating/cooling through air source heat pumps
- renewable energy generating technologies including 121kWp (anticipated) photovoltaic array are proposed.

The specification of biosolar installation should be considered to maximise the benefits associated with PV installation and green roofs.

The proposed scheme has the following CO2 emission profile:

- Resi Baseline – 41.97 tonnes CO2 per annum
- Resi Proposed – 22.07 tonnes CO2 per annum

The total on-site wide CO2 emission reduction is anticipated to be 47.41% against the building regulation baseline. The proposals are for A 19.9 tonnes/CO2 reduction in on-site emissions and would result in a carbon offsetting contribution of £62,901 to offset the remaining 22.07 tonnes CO2 and achieve net zero carbon.

It is noted in the energy assessment that peak electrical output of the PV panels is for illustrative purposes only. The peak output and anticipated energy generation per year is important for the energy assessment and calculations as it directly relates to the anticipated CO2 emission reduction proposed and the carbon offset required to meet residual emissions. It is recommended that this renewable energy generation be secured as a minimum.

In relation to sustainability the proposals are designed to achieve a BREEAM Excellent (70%). This should be secured with final score/rating evidence post completion.

If the proposals are recommended for approval they should be secured through suitable conditions or legal wording for:

- PV energy generation (121kWp) should be maximised with Biosolar roofs installed where feasible
- The carbon savings are delivered as identified in the Energy Assessment (47%)
- Post completion report (including As Build calculations) is submitted to demonstrate CO2 savings have been delivered.
- BREEAM final certificates to be submitted to demonstrate 'Excellent' rating
- Carbon Offsetting contribution is secured (£62,901).

LBTH Environmental Health – Air Quality Team

5.16 No objections towards the proposed development subject to the application of conditions securing details of a Dust Risk Assessment and of methods in place to ensure that any development associated with the appraisals does not adversely affect local air quality to an unacceptable degree.

LBTH Environmental Health – Smell and Pollution

5.17 No objections towards the proposals.

LBTH Environmental Health – Contaminated Land

5.18 No objections to the proposals.

LBTH Transportation and Highways

5.19 The proposals have been through a comprehensive pre-application phase. The applicant has taken on board most, not all, of the advice given by LBTH Transportation and Highways.

Currently the site is used for various uses which results in unrestricted and unsightly vehicle parking. The proposals seeks to rationalise the uses and to provide regulated parking and servicing areas. The proposals should result in a much more pleasant environment in terms of vehicle use (numbers and parking).

In terms of access it would have been preferable from the perspective of LBTH Transportation and Highways to remove the eastern most access on Empson Street, as this would have removed vehicles needing to drive past residential blocks in Empson Street, and instead would have concentrated the vehicle movements to an improved eastern entrance. The applicant team however, did not agree with this.

The entrances, particularly the western entrance, through which the heavier goods will be concentrated, will be improved in looks and in safety terms. This is welcomed. The

internal layout works in a loop fashion, allowing vehicles to enter and exit the site in forward gear.

Accessible car parking and cycle provision is provided and considered acceptable for the type of use proposed. The internal public realm is accessible to pedestrians, cyclists and wheelchair users and a vast improvement on the existing conditions. An area of land is put aside for a landing area should a future proposal for a new bridge over the canal come forward.

LBTH Transportation and Highway would seek to improve the public realm through a s278 agreement in Empson Street and the public highway part of Towcester Road. Should planning permission be granted we would also request that conditions be applied to ensure that:

- All accessible parking bays and cycle facilities are maintained for their approved use one only for the lifetime of the development.
- All accessible parking bays and cycle facilities are only to be used by registered blue badge holders – either staff or visitors. These are not to be sold or leased to anyone not associated with the development.
- A Construction Management Plan is to be secured as a pre-commencement condition.
- A Travel Plan is to be secured also.

LBTH HIA Officer

- 5.20 With respect to the Circular economy hub the applicant is to provide further information on how this will be managed and advise on how the long term sustainability of the hub will be achieved.

In terms of Affordable workspace, the unit offered as affordable seems of a compromised shape.

The Applicant should advise how the triangular shape is intended to be used, and provide assurances that the discounted rate is applied to this unit takes into account the compromised shape to maximize affordability. I.e. What is the market rate of a triangular unit.

The proposals refer to the inclusion of community art. This may be better-provided off-site due to the lack of permeability of the site. Community art should be reflective of local community particularly vulnerable groups. Applicant should advise how this is to be ensured.

LBTH Waste Management

- 5.21 The proposals have been through a rigorous consultation process and pre-application meetings.

The proposals are for commercial units to be serviced by external waste collection contractors who can adapt to varying needs. Consideration has been given in accordance with the RRW SPD guide.

As commercial units, the proposed weekly waste collections per week can be considered. The application proposes that the main vehicle access and egress point be from the western access on Empson street, and this has been designed to accommodate 16.5m arctic as the largest vehicle. The proposed controlled access (gated central area) and the waste plan coordinator will also manage the vehicular movement and avoid vehicles queuing back onto the highway. This is supported.

The submitted waste strategy does proposed bin storage areas within each commercial unit and provisions have been made in line with SPD guidance. The proposed weekly collection of waste is deemed acceptable noting the presence of a waste plan coordinator to manage any variation in capacity.

6. 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)
- The Tower Hamlets Local Plan (2020)

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

Land Use - (*Concentration of existing use*)

- o Local Plan policies – S.EMP1, S.MW1, D.EMP2, D.EMP3, D.EMP4, D.MW2
- o London Plan policies – GG2, E5, E4, SI8, SI8

Design - (*layout, townscape, massing, heights and appearance*)

- o Local Plan policies – S.DH1, D.DH2, S.DH3
- o London Plan policies – D1, D3, D4, D8, HC1, SI2

Amenity - (*privacy, noise, light pollution, odour construction impacts*)

- o Local Plan policies – D.DH8 and D.ES9
- o London Plan policies – D3

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

- o Local Plan policies – S.TR1, D.TR2, D.TR3, D.TR4, D.MW3
- o London Plan policies – T1, T2, T3, T5, T6

Environment - (*air quality, odour, waste, climate change,*)

- o Local Plan policies – S.ES1, D.ES2, D.ES4, D.ES5, D.ES7, D.ES9,
- o London Plan Policies – SI1, SI2, S13, S17, D14

Biodiversity – (*biodiversity, trees, SINC*)

- o Local Plan policies – S.OWS1, S.OWS2, D.OWS3, D.OWS4
- o London Plan Policies – G5, G6, G7

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

- GLA Sustainable Design and Construction (2014)
- GLA Accessible London (2014)
- GLA Character and Context SPG (2014)
- National Planning Policy Framework (2023)
- National Planning Policy Guidance (updated 2023)
- The Planning (Listed Buildings and Conservation Areas) Act 1990

- Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations)
- LBTH Planning Obligations SPD (2021)
- LBTH Reuse, Recycling and Waste SPD (2021)
- TfL London Cycling Design Standards (2014)

7. ASSESSMENT

7.1 The decisive issues are:

- i. Land Use
- ii. Design
- iii. Neighbouring Amenity
- iv. Transportation and Highways
- v. Waste Management
- vi. Environment
- vii. Biodiversity
- viii. Public Engagement
- ix. Equalities and Human Rights

Land Use

- 7.2 The application site pertains to the Empson Street Strategic Industrial Location (SIL), which plays an important sub-regional industrial warehousing and waste management role serving not just the borough but other parts of central London. Tower Hamlets has a relatively limited supply of industrial land and floorspace, despite high levels of market demand, in the face of increasing competition from other land uses, such as housing. There are clusters of existing industrial activity predominantly in the north east of the borough along key transport routes. These sites need to be protected to support the long term needs of the borough and role of the City of London and Canary Wharf as global economic hubs.
- 7.3 Strategic Industrial Locations should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy, in accordance with E5 of the London Plan (2021). Development proposals in SILs should be supported where they propose uses which fall within the industrial-type activities set out in Part A of Policy E4 (Land for industry, logistics and services to support London's economic function).
- 7.4 The application site currently comprises of low-quality industrial accommodation, with many of the buildings either dilapidated or vacant, and which fundamentally do not meet the needs of modern industrial occupiers. A cement works is also located on the site, which currently not in use at present. Additionally, it should be noted that the site is currently used as a place of unregulated car parking. The site contains a total of 9 buildings, which include; MOT Building (GIA of 312sqm); Colbart House (GIA of 379sqm); Clifford Warehouse (GIA of 433sqm); Clifford Office (GIA of 380sqm); Hillstone Court (GIA of 1,432 sqm); Café (GIA of 33sqm); Concrete Works buildings, 2-3 Towcester Road (GIA of 1,303sqm); and Clarkson Unit (GIA of 693sqm).

- 7.5 It is noted that Clifton House was previously purposed as an asbestos waste storage location. There is however no longer a need to provide an asbestos waste capacity on site. However, as outlined under policy S.MW1 of the Tower Hamlets Local Plan (2020), there is a safeguarded waste designation of 418 tonnes per year; which is further supported by policies SI 8 and SI 9 of the London Plan (2021), which resists the loss of existing sites for the treatment and/or disposal of general and hazardous waste.
- 7.6 Policy S.EMP1 of the Tower Hamlets Local Plan (2020) affirms that development which supports, protects and enhances the role and function of the borough's designated employment locations (as defined on the Policies Map) and maximises the provision of employment floorspace to contribute towards the borough's target of creating 125,000 new jobs over the period to 2031, will be supported in line with the principles set out for the given site of each development. The current proposals seek permission for the demolition of all buildings present on site, aside from the MOT building. The loss of the existing employment uses, and waste storage uses, will be discussed below.

Loss of existing commercial uses

- 7.7 Policy D.EMP3 of the Tower Hamlets Local Plan asserts that development resulting in the net loss of employment space within Preferred Office Locations, Local Industrial Locations and the Strategic Industrial Location will not be supported.
- 7.8 The current proposals seek permission to demolish 5,237sqm (GIA) of industrial/light industrial commercial floorspace, and 33sqm (GIA) of Class E(b) Use (Café) floorspace. The application does however seek to redevelop the site to provide 11,664 sqm of flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/B2/B8), with ancillary offices, spread across the two rows of central industrial units.
- 7.9 Additionally, whilst the proposals seek to retain the existing MOT centre, it is proposed that the building is changed from Use Class B2, to a flexible (g)(ii)/E(g)(iii)/B2/B8 Use. The site will be split into 4 units; with 1 ground floor unit measuring 122sqm being purposed as a circular economy hub. This unit will serve to meet the site's safeguarded waste designation of 418 tonnes per year.
- 7.10 The proposed loss of existing commercial uses is considered acceptable given that the proposals would result in a significant net increase of flexible light industrial employment floorspace within the borough and ensure that the provision of workspaces are adequate for the needs of current and future business. Furthermore, the loss of the site's existing E(b) use (café) raises no concerns, given that the site does not fall within either the Central Activities Zone, Canary Wharf Major Centre, Tower Hamlets Activity Areas, District Centres, or Neighbourhood Centres, and thus is not considered an appropriate use for the site, in accordance with policies D.TC5 and S.EMP1 of the Tower Hamlets Local Plan (2020).

Principle of proposed (light) industrial employment uses

- 7.11 The proposals seek to redevelop the application site to provide 11,986sqm of flexible light-industrial floorspace, suited to the needs of current and future business, within the borough. The flexible Class B2, B8, E(g)(ii), and E(g)(iii) floorspace is proposed to widen the scope for future occupiers of the site. The site has been divided into two distinct areas: the new build central industrial units and the MOT building. It is proposed that the latter, be retained and refurbished to provide affordable workspace and a new Circular Economy Hub.
- 7.12 Policy GG2 of the London Plan (2021) actively supports applications which seek to intensify the use of land to support additional homes and workspaces, and which

promote higher density development, particularly in areas that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

- 7.13 Policy E5 of the London Plan (2021) states that boroughs should explore opportunities to protect and enhance the function of SILs and enhance their attractiveness and competitiveness. Furthermore, development proposals in SILs should be supported where the uses proposed fall within the industrial type activities set out in Part A of Policy E4 (Land for industry, logistics and services to support London's economic function).
- 7.14 Part A of Policy E4, states that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution. This should make provision for the varied operational requirements of;
1. Light and general industry (Use Classes B1c and B2)
 2. Storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
 3. Secondary materials, waste management and aggregates
 4. Utilities infrastructure (such as energy and water)
 5. Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
 6. Wholesale markets
 7. Emerging industrial-related sectors
 8. Flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
 9. Low-cost industrial related space for micro, small and medium-sized enterprises
 10. Research and development of industrial and related products or processes falling within Use Class B1b)
- 7.15 The proposed flexible land uses are consistent with those designated appropriate for London's Strategic Industrial Locations. Furthermore, the intensification of said uses is further supported in accordance with policies GG2 and E5 of the London Plan (2021), and policy D.EMP2 of the Local Plan (2020). If permitted, the scheme would support and enhance the role and function of the borough's only designated Strategic Industrial Location and would contribute towards the borough's target of creating 125,000 new hobs over the period to 2031. The proposed flexible light-industrial uses are considered acceptable for the site and raise no objections in terms of land use principles.

- 7.16 Whilst the proposed land uses are supported as currently presented, officers do propose to apply condition to remove permitted development rights, and thus ensure that only those Class E uses considered appropriate for the Strategic Industrial Location (Use Class E(g)(ii) and E(g)(iii)), may be occur within the Empson Street Industrial Site.



Figure 1.2: CGI aerial view of proposals, looking west towards the site.

Principle of proposed Circular Economy Hub

- 7.17 As previously discussed, the application site contains Clifton House, which was historically used as an asbestos waste storage location. Whilst there is no current need to store asbestos waste materials, the application site does nonetheless still include a safeguarded waste designation of 418 tonnes per year, in accordance with policies SI 8 and SI 9 of the London Plan (2021), and S.MW1 of the Tower Hamlets Local Plan (2020).
- 7.18 Officers note that Part D, of Policy SI 9 states that development proposals that would result in the net loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste site provision has been secured in accordance with this policy.
- 7.19 However, despite the site's historic use in handling asbestos, officers do not consider part D of Policy SI9 to be relevant, given that Clifton House is understood to have been used as a storage facility, rather than a place of treatment or disposal.
- 7.20 Policy SI8 of the London Plan (2021) states that in order to manage London's waste sustainably, the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026, with existing waste management sites

being safeguarded and the waste management capacity of said sites being optimised. Furthermore, environmental, social and economic benefits from waste and secondary materials should be created.

- 7.21 Part D, of Policy SI8 goes on to outline that development proposals for materials and waste management sites will be encouraged where they: 1). deliver a range of complementary waste management and secondary material processing facilities on a single site; and 2). Support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets.
- 7.22 As per Policy D.MW2 of the Tower Hamlets Local Plan (2020), proposals to construct a new waste facility, or replace or extend an existing facility will be supported where it:
- a). contributes towards the aims of sustainable waste management in line with the waste hierarchy;
 - b). it is located within a safeguarded waste site or area or area of search or integrated into a suitable new development,
 - c). it incorporates a high quality design, is of a scale and nature which integrates into its surroundings and ensures compatibility with adjacent existing and proposed land uses;
 - d). it co-located with other compatible uses; f). it has good access to the strategic transport network, including where possible, rail and canal/river links that offer the potential to transport waste.
- 7.23 The application proposes to introduce a Circular Economy Hub (CEH) to the existing MOT building. The CEH will be located within one of the two ground floor units (Unit 2), which measures approximately 122sqm (GIA). It will be serviced by a private yard to the rear of the Unit, measuring approximately 84sqm.
- 7.24 The application is inclusive of a Circular Economy Hub Guidance Note, which serves to explain how the CEH will operate. The CEH is proposed for business-to-business use and will handle materials from the following waste streams; timber, textiles, and used electronics. It is envisaged that within the MOT centre, three small businesses which operate within the Circular Economy will be collocated to optimise the success of the CEH.
- 7.25 The principle of a Circular Economy Hub is supported by officers and has been subject to detailed discussions as part of the pre-application process. The applicant team have engaged with LBTH Employment Officers and local operators of similar facilities, to tailor the offering presented as part of this application. Most notably, the applicant team (Fabrix) have worked with the Hackney Fish Island Community Development Trust to develop a management plan for the successful operation of the CEH.
- 7.26 An outline management plan has been provided as part of the current application. It explains that the CEH will be for business-to-business use; it will not be a location for commercial residents to deposit waste on the site. Each business will be responsible for collecting the waste materials needed for manufacturing or production purposes from the local area, with wider industrial park tenants, prioritised where appropriate.

Waste will be stored within the individual units and under a covered yard space. The final managing agent will be obliged to agree within the terms of agreement with any sub-tenants a policy that stipulates that the site is not a storage facility for waste materials and that a turnover of materials over a 3-month period is required, plus a clause about the maximum quantum of materials to be stored at any time.

- 7.27 Officers consider the outline management plan to be acceptable. It gives clear indication that meaningful steps have been made by the applicant team, to ensure that a local managing organisation with relevant experience is onboard with the proposals, as requested by officers throughout the formal pre-application process. If permission is to be granted, officers propose to apply condition to secure details of a management plan for the circular economy hub, as well as the industrial employment spaces, to ensure compliance with the outline management plan and mitigate issues of safety and waste dumping from arising within the local area. The principle of introducing a Circular Economy Hub is consistent with the policies of the development plan and does not raise land use issues.

Securement of Nil Rent for Circular Economy Hub

- 7.28 As part of the application, it has been agreed that the Circular Economy Hub will be delivered with no rental cost to the final managing organisation, for a period of no less than 10 years. This planning benefit will be secured by s.106 agreement with the Local Planning Authority and represents an important planning benefit which will support the occupation of continued viability of the Circular Economy Hub. Not only is it envisaged that this would support local business present within the borough, but it will also help to reduce the quantum of waste products created each year.

Affordable workspace contributions

- 7.29 Affordable Workspace covers all commercial premises where at least 10% of the gross internal floorspace is offered at a reduced rate. It is workspace let out at below market rents, either in perpetuity or for a fixed period (i.e. for a minimum period of 10 years or more) with the purpose of encouraging access by local entrepreneurs, particularly for those from disadvantaged backgrounds.
- 7.30 As is outlined under Policy E3 of the London Plan (2021), consideration should be given to the need for affordable workspaces. Within Tower Hamlets, major commercial and mixed use development schemes, are required to provide at least 10% of new employment floorspace as affordable workspace, in accordance with policy D.EMP2. This workspace should be let at an affordable tenancy rate at least 10% below the indicative market rate for the relevant location, as explained within the LBTH Planning Obligations SPD (2021).
- 7.31 The current proposals seek to provide 11,964sqm of employment floorspace. Of which 1,198sqm will be delivered as affordable workspace, meeting the minimum provision of at least 10% of all workspace being affordable, in accordance with policy D.EMP2. The subsidised rate will be secured for a period of not less than 10 years, by way of a s.106 agreement, in accordance with the LBTH Planning Obligations SPD. Fu
- 7.32 The Affordable Workspace units are proposed to be located within the MOT building, in close proximity to the CEH, and within Unit 10 of the centralised Warehouse Units. With those units, positioned within the MOT building envisaged to work within the Circular Economy, and thus create mutually beneficial working relationships with the CEH itself.

Affordable workspace units (MOT Building)

- 7.33 The re-purposed MOT garage, comprising three units across the ground and first floors will feature smaller-scale light industrial units. The ground floor unit, Unit 1, will provide 78sqm of workspace and benefit from minimum floor to ceiling heights of 3.72m. The first-floor units, 3 and 4, will provide 15sqm and 17sqm of floorspace, respectively and benefit from minimum internal floor to ceiling heights of 3.23m. These units are to be equipped with power, as well as heat and lighting provisions, and

exposed services. Shared facilities such as an entrance lobby, WC block, bin stores, and bike storage facilities will all be included.

Affordable workspace units (Centralised Industrial Unit 10)

- 7.34 Additional Affordable Workspace is proposed to be housed within Unit 10, which would be located within the southeast corner of the site, bounded by the centralised access yard to the north, and Towcester Road to the east, south east and south. It is proposed that Unit 10 provides 1009sqm, split across three internal mezzanine floors.
- 7.35 Unit 10 is positioned within the southern bank of warehouse units. It differs from its neighbouring units, in that there is no void area, to provide an internal maximum floor to ceiling height of 16.37m. The concentration of affordable workspace is far greater, than the concentration of market workspace, proposed from units 1-9. Concerns were raised during formal pre-application discussions with respect to this differing approach.
- 7.36 The applicant team have however sought to provide affordable workspace across three mezzanine floors as it is believed that the units will better meet the needs of small to medium businesses, to which affordable workspaces are suited for, as the reduced quantum of space will be reflected within rental costs.
- 7.37 Notwithstanding differences in terms of floor to ceiling heights, the affordable workspace within the central industrial unit's specification and construction is to match other neighbouring industrial units. It would comprise exposed structures and services, along with amenities such as a Disability Discrimination Act (DDA) compliant WC, circulation stair, and lift. This also includes a CAT A fit-out of the offices which includes lighting, raised access flooring, heating and cooling provisions and kitchenette. Natural daylight is to be provided via rooflights &/or windows, depending on the floor. This approach is supported by LBTH Growth and Economic Development Officers.
- 7.38 Externally, a designated loading area is provided within the service yard, complete with roller shutter access to the ground floor. The affordable workspace would also include amenities such as an accessible parking bay, EV charging station, secure bike storage and bin storage within the central yard, in a manner consistent with the market warehouses.
- 7.39 The provision of affordable workspace contributions is compliant with policy D.EMP2. The onsite affordable workspace contributions would be secured via a s.106 agreement with the applicant team. Officers propose to apply details of a management plan, which will be provided to all tenants of the site, irrespective of tenancy type. Condition is also proposed to prevent the introduction of mezzanines within any warehouse units, without first seeking full planning permission, to ensure that a policy compliant provision of affordable workspace is secured throughout the lifetime of the development.

Conservation and Design

- 7.40 The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. With regard to Conservation Areas, Section 72 of the Act imposes a duty upon Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- 7.41 Paragraph 131 of the NPPF (2023) 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.

- 7.42 Policy D3 of the London Plan (2021) requires development to follow a design-led approach, in order to optimise the capacity of sites throughout London. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to the site's context and capacity for growth.
- 7.43 Policy HC1 of the London Plan (2021) asserts that Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the asset's significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 7.44 Local Plan (2020) policy S.DH1 stipulates that development is required 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 special scales, including the character of the local setting to which it is set. Development must be of an appropriate scale, height, mass, bulk and form in its site context. Policy D.DH2, goes on to state that development is also required to positively contribute to the public realm. Furthermore, as outlined under policy S.DH3 of the Local Plan (2020), proposals must 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.
- 7.45 The application site as exists, is dilapidated and shows prominent signs of physical degradation. The site contains a total of 9 buildings, with all except one (the MOT Building) to be demolished, subject to the grant of planning permission. The proposals can be split into two broad sections: the MOT Building, and the centralised warehouse buildings, arranged in two rows running along east-west axis.

Built form, urban scale, massing and form (MOT Building)

- 7.46 The proposals seek to retain and renovate the MOT building which is located in the north west corner of the site. The building is primarily 1 storey tall, however, the north east corner steps up to 2 storeys in height. At present, there exists a single storey irregular shaped extension, attached to the site's northern elevation which is understood to serve as a foyer/reception area. It stands to a height of 2.82m and provides approximately 33.2sqm of internal floorspace.

Additionally, there is a single storey extension which sits directly above groundfloor extension, which provides approximately 22.28sqm of internal floor space. The extension measures 2.64m (depth) x 8.44m (width) x 2.5m (height); with the structure standing to a maximum height of 5.6m above ground level.

- 7.47 The current proposals seek to retain much of the host building, however as part of the proposals it is proposed that the prior mentioned extensions be removed entirely. Thus, the overall impacts in terms of bulk and mass are considered minor, with officers of the view that the changes represent an enhancement to the overall aesthetic quality and character of the building.

Built form, urban scale, massing and form (Industrial Warehouses)

- 7.48 The centralised warehouse units comprise of two rows, which will sit opposite one another, separated by a centralised service yard measuring 30.44m in width. The northern row will comprise Units 1 to 6: the southern row will include Units 7-10. The dimensions of each row will be discussed separately below.



Figure 1.3: CGI of Central Industrial Units Yard

- 7.49 The northern row of warehouses would run adjacent to Empson Street, ending at the junction shared of Towcester Road. The structure will cover a gross external area of 4708sqm with its northern elevation measuring 177.86m and its southern elevation measuring 160.5m. The proposed west elevation would measure 27.25m, and this would represent the maximum depth of the building. At its eastern end, the structure tapers in shape, in response to the existing layout of Towcester Road.
- 7.50 The northern row of warehouses would stand to a maximum height of 15.035m at the eaves, with a pitched roof which would reduce in scale to a height of 13.652m of the warehouse's north and south elevations. Internally, the warehouse would benefit from a maximum floor to ceiling height of 13.294m, reducing in size to 12m at the extremities of the building.
- 7.51 The southern row of warehouses will run adjacent the Towcester Road and the existing Service Road which connects the south of the Industrial Estate. The structure would cover a gross external area of 3889sqm. Its northern elevation would measure 123.9m and its southern elevation will measure just 95.31m. The structures west elevation measures 36m and this represents the maximum depth of the warehouse. Towards the east end, the warehouse tapers in size, as the building shape responds to the path of Towcester Road.
- 7.52 The northern row of warehouses would stand to a maximum height of 17.547m at the eaves, with a pitched roof which will reduce in scale to a height of 15.652m of the

warehouse's north and south elevations. Internally, the warehouse would benefit from a maximum floor to ceiling height of 16.367m, reducing in size to 14m at the extremities of the building.

- 7.53 The centralised warehouse units are of an acceptable scale. Although larger than the buildings in the immediate vicinity of the site, the development is still considered to be of low scale. This is further supported by the AVR's provided as part of the application which shows that the buildings would be received as being similar in size, or smaller than development located in the local area. Furthermore, the sleek design proposed and inclusion of appropriate separation distances, serves to lessen the sense of bulk and mass associated with the development. The proposals are considered to be sensitive to the local setting, in accordance with policies S.DH1 and S.DH3 of the Tower Hamlets Local Plan (2020). Likewise, the scale and massing of the development is not considered to cause harm to the Limehouse Cut Conservation Area, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Materials and Detailing

- 7.54 The proposals present a consistent sense of character across all three buildings. This is aided by a consistent, simple choice of materials and colour palette. The retention of the MOT building's red brick façade represents a sustainable approach to the redevelopment of the site, in a manner that also aids place making. The robust sturdy character of the red brick will be further enhanced by the inclusion of black powder coated horizontally corrugated stainless steel cladding; which is of itself in keeping with the materials and finishes of the newbuild warehouses.
- 7.55 The industrial warehouse buildings represent a high standard of design, which would positively contribute to creating a sense of place, for the industrial site. The two banks of warehouses would, if permitted, represent a clear and tangible enhancement when compared to the existing setting. The warehouses have been designed in a manner consistent to the approach taken with the MOT building. The form of the warehouses are simple and sleek. They consist primarily of black powder coated, vertically corrugated steel, which both provides texture and serves to subtly breakdown the sense of massing associated with the development. The inclusion of supergraphics and a consistent pattern of fenestration pattern throughout, further serves to create a clear and strong identity for the site, which is representative of its use.
- 7.56 Should planning permission be granted, officers propose to apply conditions to secure detail of final materials, colours and finishes to be used. In consideration for the materials, officers will have regard to the proposed final materials with regard to their energy and sustainability criteria, as well as the circular economy principles (such as reuse), proposed as part of this application. Additionally, a condition will be applied to secure detail of the final supergraphics, signage and a signage strategy to be used across the site, to ensure that the same high standard of design is delivered at the stage of delivery.

Landscaping design and public realm

- 7.57 The application is supported by a detailed and thorough Landscape Statement, produced by Landscape Projects, on behalf of Fabrix London Limited (the Applicant). The statement sets out that the site is currently occupied by low-quality warehouses, industrial buildings and derelict former concrete buildings, with limited soft landscape and greenery

There are low quality ground surfaces, predominantly concrete in a poor condition, with no contribution to the landscaped setting. The existing landscape is also considered to contribute negatively to the residential properties which populate Empson Street.

- 7.58 Through the development of the landscape strategy, Landscape Projects have sought to establish two clear visual points of arrival to the site, where the site connects to Empson Street via Towcester Road (to the east) and via the MOT building (to the west). The landscape strategy has been designed to improve the entrance areas to and from the site and to focus landscaping, signage and building frontages at places where visitors will first see the development, as illustrated by figure 1.4 below:



Figure 1.4: Landscape Strategy highlevel concept

- 7.59 The landscape proposals serve to create a series of distinctive landscape spaces across the site. This is achieved through the retention of existing trees and introduction of low maintenance evergreen ground cover, and birch tree plantings at the arrival and entrance points; and the introduction of wildflower plantings, divisional hedges and green roofed cycle stores, into the harder working central activities yard.
- 7.60 The west arrival point, which sits closest to the primary entrance point, would benefit from renovations to the MOT building. The removal of low quality bolt on temporary extensions, would be further enhanced by the newly landscaped arrival, including stepped planters with steps, handrails and ramps to provide level access.
- 7.61 The proposed materials and finishes would consist of crushed concrete and brick from the demolition process to provide an aggregate mulch that would provide weed suppression and reduce maintenance costs. Furthermore, it would serve to reuse waste products in line with the principles of circular economy building practices.
- 7.62 Mesh fences would be introduced also, in order to bolster the site's security. The fences would be inclusive of, and encourage the growth of climber plants to bolster the site's biodiversity levels, whilst also helping to develop an inviting sense of characters for future visitors and tenants of the site.



Figure 1.5: Landscape strategy permeable surfaces

- 7.63 At the point of entrance to the industrial warehouses, the proposals seek to introduce birch trees which would provide an open canopy, sitting above an evergreen ground cover. The canopy would partially obscure the west elevations of the two banks of warehouses, which would feature large supergraphics of place branding. This juxtaposition of nature and industrial uses is presented in a complimentary manner and would create a distinct sense of place.
- 7.64 The centralised yard has been designed as a place of activity and function. Whilst it's landscaping is harder, than that of the access and entrance points, the proposals do still seek to introduce greenery and vegetation. This is achieved through the introduction of wildflower plantins, divisional hedges and green roofed cycle stores.
- 7.65 Figure 1.6 below serves to show how the cycle and bin stores have been designed to provide secure and convenient tenant amenities on site, which also support the growth of vegetation at roof level, with gabions supporting the growth of climbers and/or other vegetation on the elevations of each cycle/bin store. This would serve to not only bolster the site's biodiversity level but also provide's visual relief for visitors and tenants of the site.

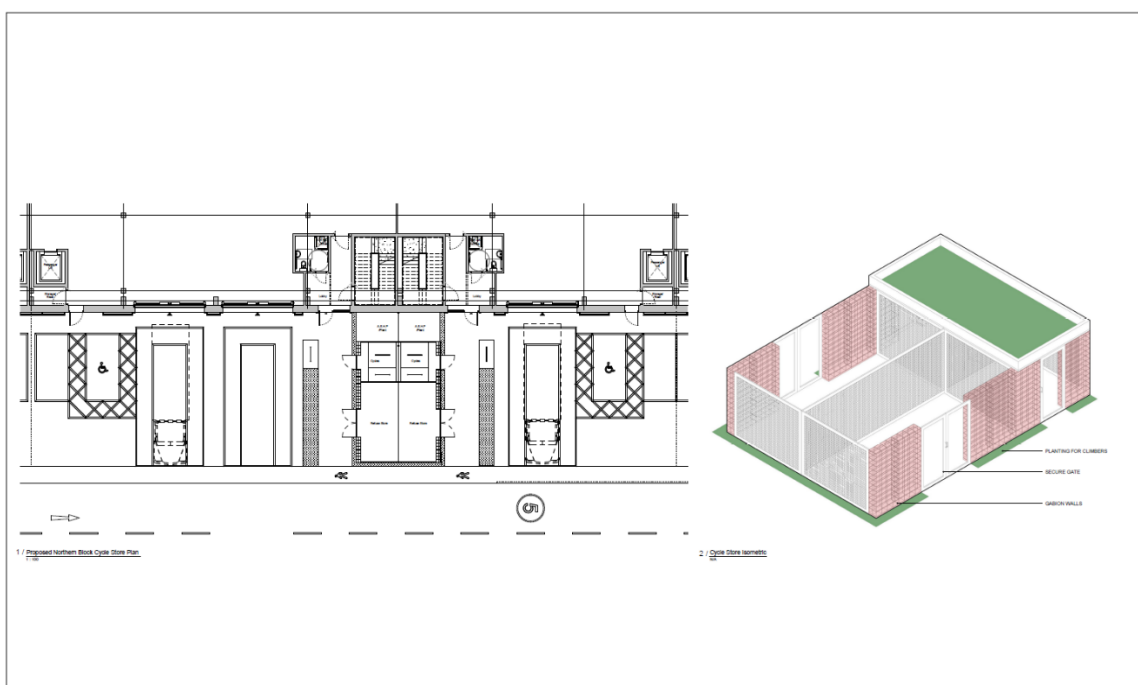


Figure 1.6: Plans for cycle and refuse stores, including green roofs and climbers.

Access and legibility

- 7.66 Policy D5 of the London Plan (2021) requires development to achieve the highest standards of accessible and inclusive design. Policy D.DH2 of the Tower Hamlets Local Plan (2020) further states that development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough, ensuring a well-connected, joined up and easily accessible street network and wider network of public spaces.
- 7.67 Access arrangements have been discussed in detail as part of the formal pre-application process. The current proposals have responded to those discussions and ensured that the layout of buildings, parking and servicing facilities, and pedestrian walkways has been designed appropriately to ensure safe and secure travel for all those working or visiting the site, taking account for the needs of London's diverse population.
- 7.68 The proposals comprise of safe and secure pedestrian walkways, which are inclusive of tactile paving and dropped curbs, to ensure safe and secure north-south movement, across the site's central access yard, via x4 pedestrian crossings. This same approach is also taken at the points west access point, as well as the east edge of the site, to allow safe crossing via Towcester road.

Lighting Strategy

- 7.69 Policy D8 of the London Plan (2021) outlines that development should ensure the 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. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 7.70 Policy D.DH2 of the Tower Hamlets Local Plan (2020) further requires development to create clear sightlines and improve legibility and the lighting of the surrounding area at all times of the day and night, as well as to create opportunities for natural surveillance to occur.
- 7.71 Policy D.DH8 of the Tower Hamlets Local Plan (2020) serves to ensure that residential amenities are preserved, or where possible enhanced by development within the borough.
- 7.72 The application is inclusive of an External Lighting Assessment which has been prepared by Watkins Payne. The proposals do not seek to use uplighting, in order to mitigate causing unnecessary harm to local wildlife. The lighting Impact Assessment indicates that the proposals would not give rise to undue harm by way of light pollution or light disturbance.

However, given the site's proximity to the Limehouse Cut which forms part of a Site of Importance for Nature Conservation (SINC), officers consider it appropriate to secure details of an updated lighting strategy by way of condition in accordance with policies S.OWS1 and S.OWS2 of the Tower Hamlets Local Plan (2020).

Fire Safety

- 7.73 Policy D5 of the London Plan states that building should be designed to incorporate safe and dignified emergency evacuation for all building users. Policy D12 further outlines in the interest of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Additionally, it is requirement that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitable a qualified assessor.
- 7.74 A fire statement produced by Semper has been submitted as part of the current application. The initial assessment raised concerns when assessed by London Fire Brigade. The fire statement has been amended to overcome the issues raised. London Fire Brigade have now removed their concerns, however officers do still propose to apply a condition of compliance to ensure that all parts of the 15% perimeter proposed for each commercial unit is within 18m of the fire appliance parking position, with pedestrian access to a door giving access to the interior of the building.

Neighbouring Amenity

- 7.75 Policy D.DH8 of the Local Plan (2020) stipulates that development is required 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. Policy D3 of the London Plan (2021) requires that site capacity is optimised through a design-led approach, which seeks to deliver appropriate outlook, privacy and experienced amenity for future occupants of the site.

Overlooking, loss of privacy

- 7.76 The application site is located within the Empson Industrial Estate and is bounded by industrial use buildings. The closest residential buildings to the site are those which populate Empson Street. The minimum distance being 35m, measured from the MOT centre; however, most of the site will be obscured from view by the presence of Empson Street Studios which runs adjacent to the site's northern boundary.
- 7.77 The proposals are not considered to present opportunities for overlooking or a loss of privacy to occur, due to both the separation distances that exist between the site and the closest residential properties, and due to much of the site being obscured from said properties by the existing urban grain.

Daylight Sunlight and Overshadowing

- 7.78 It is noted by officers that under policy D.DH8 of the Tower Hamlets Local Plan (2020) there is a requirement for all major applications to be inclusive of a Daylight Sunlight Impact Assessment. This application does not include such a document; however, it is supported by an Environmental Impact Assessment. Officers conclude that given the site's setting within the Empson Street Industrial Site, an area whereby residential uses are not supported, as well the overall scale (height, bulk, mass), and the site's location relative to nearby residential buildings, there is in this instance no need for such a document to be provided.

Conclusion

- 7.79 In assessing the application, it should be noted that an Environmental Impact Statement has been submitted as part of the proposals. It has consideration for issues pertaining to air quality, noise pollution, construction impacts, amongst other topics. These will be discussed separately at later stage in the report, with residential amenity

impacts considered as part of the relevant assessment. However, with considerations for the topics covered above (privacy, overlooking, overshadowing, and daylight sunlight), officers do not consider the proposals to present harm to local residents. Thus, the scheme is considered to be compliant with Policy D.DH8 of the Tower Hamlets Local Plan (2020), and policy D3 of the London Plan (2021).

Transport

- 7.80 Development Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing throughout the full lifetime of development, inclusive of the construction phase.
- 7.81 The submitted information in relation to transport considerations and impacts has been included within Chapter 6 of the Environmental Impact Statement, and both the Transport Assessment and Framework Travel Plan, which were both produced by Pell Frischmann.
- 7.82 The site is situated within an area of good public transport connectivity and accessibility, which is indicated by the site's Public Transport Accessibility Level (PTAL) score of 3-4. The majority of the site sits within PTAL 4; however, the southwestern segment sits within PTAL 3.
- 7.83 The site sits adjacent to is the A12 Blackwall Tunnel Approach Road, which forms part of which forms part of Transport for London Road Network (TLRN). It is accessed via Devas Street / Twelvetrees Crescent approximately 400 metres from the main highway access to the site.
- 7.84 The closest stations are Devons Road on the Docklands Light Railway (DLR), approximately 300m to the west of the site and Bromley-by-Bow on the District / Hammersmith & City line approximately 350m north of the site. There are two bus stops within walking distance of the site, on A12 and Devas Street, served by the D8 and 323 services respectively. The D8 southbound stop is accessed by a subway below the A12. The site records public transport accessibility levels (PTALs) of 3-4 on a scale 0-6b, where 6b is the highest. A Mayor of London cycle hire docking station is 400m to the north of the site.

Vehicular, pedestrian and cycle access and movement

- 7.85 The main vehicle access and egress point will be from the western access on Empson Street and this has been designed to accommodate 16.5m articulated vehicle as the largest vehicle. The internal site road has been designed based on a two-way system so that vehicles can both enter and exit using the western access as the primary means of access.
- 7.86 Whilst both accesses have been retained for use to ensure access for the existing users of the wider site, the eastern access will be limited to 7.5tonne box vans, with larger vehicles only able to use the western access. This is an existing limitation due to the geometry of the site access junction.
- 7.87 The central area is gated (on both sides) for both vehicles and pedestrians and a security layby will be included within the design to temporarily hold vehicles in front of the gates, which will serve to prevent vehicles queuing back onto the highway. Larger vehicles for other units will either be permitted through the central activities yard or use the existing alternative routes.
- 7.88 Fire tender access will be maintained for all buildings and limited to the main roadways.

- 7.89 The central area is designed as a shared space with a pedestrian safety strip along the northern edge of the road. Due to the central area being gated (at both ends), vehicle speeds are expected to be low and are subject to a 5mph speed limit. Towcester Road is considered to be the key pedestrian route into the site and been designed with a formal footway, as it provides convenient connection to the station and local bus stops.
- 7.90 Cyclists will be expected to use the carriageway alongside other vehicles. This is considered to be acceptable due to the low speeds and low traffic nature of the internal roads.
- 7.91 All access points will be step-free and provide appropriate lighting facilities to accommodate the needs of London's diverse population. Dropped kerbs will be provided at the location of the proposed pedestrian crossings points within the site on the central spine road and on Towcester Road.

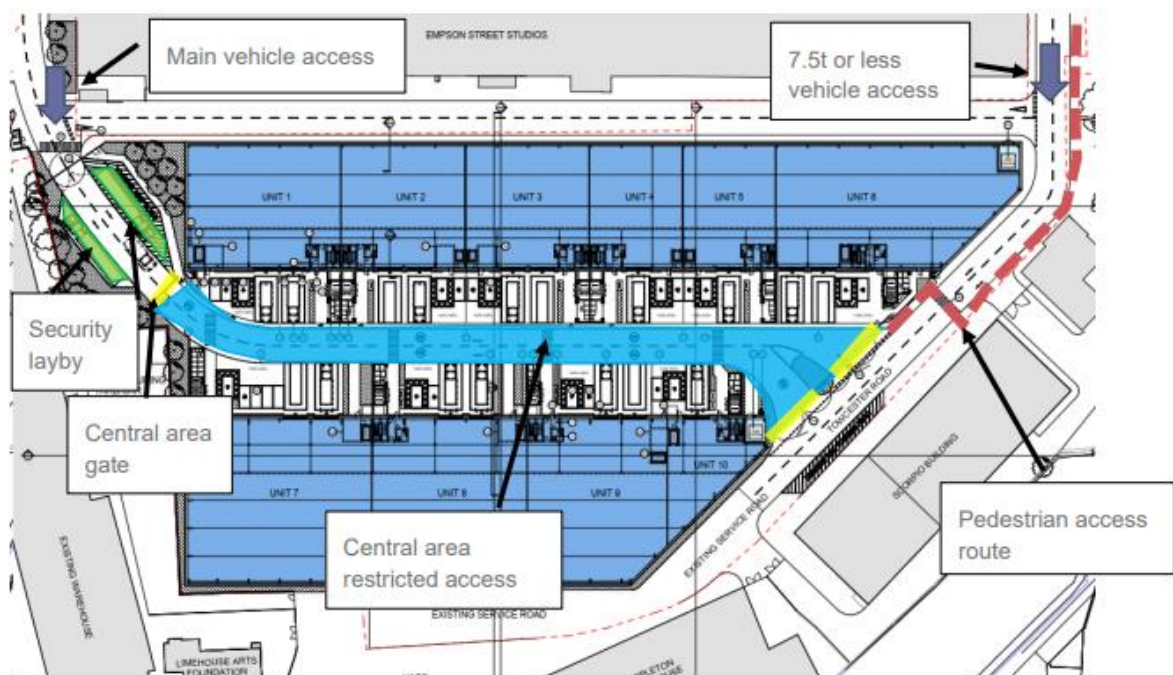


Figure 1.7: Delivery and Servicing Plan including Waste Management (DSP).

- 7.92 The proposals have undergone a comprehensive pre-application phase. Throughout the process, the applicant team have taken onboard much of the commentary provided by the borough's highways officer. The current proposals are considered to be of a high standard which will provide safe access to all those seeking to access the site, irrespective of mode of travel. The access arrangements ensure that green and active travel can take place onsite, which in turn will serve to encourage businesses to rely upon green and active travel for 'last mile' journeys, in accordance with policies S.TR1 and D.TR4 of the Tower Hamlets Local Plan (2020).

Deliveries and servicing

- 7.93 The application is supported by and Delivery and Servicing Plan including Waste Management (DSP), as well as details on the swept paths of the servicing and waste vehicles.
- 7.94 The DSP outlines that all vehicles to the proposed development will be directed to the western access. The central area is gated (on both sides) for both vehicles and

pedestrians and a security lay would be included on the western side temporarily hold vehicles on front of the gates, this would avoid vehicles queuing back onto the highway. Larger vehicles for other units would either be permitted through the central area or use the existing alternative routes.

- 7.95 Occupiers will be asked to prebook deliveries in advance to ensure efficient access into the secured area. Vehicles arriving without a booking would be subject to security checks before being permitted to enter. Vehicles arriving by mistake would be escorted into the site to allow them to turn and exist in forward gear.
- 7.96 It is proposed that the applicant is to appoint a security team to manage access into the site and provide an overview of deliveries. Each occupier would be asked to provide details of a designated 'Goods In' manager to the security team. This "Goods in" Manager would take responsibility for deliveries and servicing for their relevant unit. The goods manager would be instructed to prebook all expected deliveries to enable deliveries to be fast tracked through the security gates. Delivery vehicles arriving without a booking would be asked to pull over into the security layby and the appropriate "Goods In" manager will be contacted verify the delivery is expected. The strategy provided is clear and well thought out. Officers consider the approach to be acceptable; however, it is proposed that a final Delivery Service Plan be secured by way of condition.
- 7.97 Policy T7 of the London Plan 2021 states that to support carbon-free travel from 2050, rapid electric vehicle charging points at logistics and industrial locations is supported. Furthermore, development proposals for new consolidation and distribution facilities should be supported provided they do not cause unacceptable impacts on London's strategic road network and 2). Enable sustainable last-mile movements, including by cycle and electric vehicles.
- 7.98 Following engagement between the applicant team, TfL and LBTH Transportation and Highways, the developer has committed to, where appropriate use reasonable endeavours to encourage users to use a delivery fleet consisting of a feasible proportion of non-diesel//non-petrol engines and/or cargo bikes and/or pedestrian delivery (excluding waste and refuse collections). It is proposed that this be secured via a S106 obligations pertaining to a Travel Plan for the site. Additionally, Electric Vehicle Charging points will also be secured via a S106 agreement, in a manner consistent with the recommendations of the Environmental Statement.

Car Parking

- 7.99 London Plan policy T6 encourages car free development and states that it should be starting point for all development proposals in places that well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Proposals are still however required to provide adequate parking facilities for blue badge holders as set out in under policy T6.5.
- 7.100 Disabled parking and operation parking spaces are required for the successful operation of the development. The development will not provide any standard staff or visitor parking other than those for disabled or operation spaces.
- 7.101 It is noted that the existing site has a number of informal car parking spaces, which would be removed as part of the proposals. There are approximately 26 existing informal and unregulated car parking spaces with additional ad hoc parking occurring across the site.

7.102 The proposed development would provide 24 spaces which comprise disabled parking and operation parking spaces only). The proposed car parking (shown below in figure 1.7) arrangements consist of;

- Four standard operational car parking spaces
- 10 accessible parking spaces
- 10 active EV charging operation spaces
- 17 loading bays.



Figure 1.8: Diagram showing the central goods yard with parking and operational bays

7.103 The proposed parking provision for the site is in excess of the Tower Hamlets car parking standards. However, the proposed level of parking would be required for the operational needs of the industrial units and are appropriate for the land uses proposed. The proposed level of parking has been designed to ensure that it would not be used for the purposes of employee commuting travel, and instead serve to facilitate the day to day operational needs of the site.

7.104 Officers consider the proposed car parking facilities to be appropriate. A condition will however be applied to ensure that the appropriate mechanisms are put in place to ensure that only blue badge holders park within the designated blue badge parking bays, and that all parking bays are used for no other purpose (such as offsite parking for external parties) than those outlined within the Transport Assessment submitted as part of this application.

Cycle parking

7.105 Development should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Policy T5 of the London Plan (2021) outlines the minimum provision of cycle parking facilities which must be delivered as part of any application, to meet to support the needs of said development and its land use.

Table 1.3 below outlines the minimum cycle parking requirements necessary to comply with policy T5 of the London Plan (2021).

Floor Area (GEA)	Minimum long-stay cycle parking standards	Long stay spaces	Minimum Short-stay cycle parking standards	Short stay spaces	Total
12,639	1/250 sqm GEA	51	1/1000sqm GEA	13	64

Table 1.3: Minimum Cycle Parking Requirements – as per London Plan 2021

7.106 Table 1.4 below provides an overview of the quantum of cycle parking proposed, whilst also demonstrating compliance with policy T5 of the London Plan 2021.

Section of Development	Long Stay Spaces	Short Stay Spaces	Total
Industrial Units 1 – 10 (12,279sqm GEA)	51	13	64
MOT Building (346sqm GEA)	2	1	3
Whole Plot Total (12,639sqm GEA)	53	14	67

Table 1.4: Proposed Cycle Parking Provision

7.107 A total of 51 long-stay and 13 short-stay cycle parking spaces are provided for the 10 industrial units, which is compliant with the stated policy requirements. Cycle parking would if permitted be provided evenly across the industrial units. Additionally, 2 long-stay and 1-shor-stay cycle parking spaces would be provided to the MOT centre.

7.108 The proposals represent a policy compliant provision for cycle parking. If permission is to be granted, officers propose to apply conditions to secure final details of all cycle parking, to ensure that it is compliant with TfL's London Cycling Design Standards, and the policies of the Development Plan. Furthermore, condition will be applied to ensure that the cycle parking is made available and maintained for the full lifetime of the development.

Trip generation

7.109 The submitted Transport Assessment and Delivery and Servicing Plan including Waste Management has undertaken a trip generation assessment to determine the multi modal trip generations of the existing site and the proposed development.

7.110 Clarifications have been provided through additional information, issued in response to requests for clarification from TfL. This included additional details on the three-hour period details for trip generations, clarification of impact on local public transport routes, clarification of updated vehicular distribution onto the local and strategic highway network, and potential mitigation.

7.111 Overall, the provided information indicates that the majority of traffic would access the via the A12 rather than the immediate local road network, which helps ensure that impacts on local highways would be limited, however there would impacts on

Empson Street and Devas Street. Thus, TfL have advised that physical works should be secured through a S278 agreement, to ensure adequate improvements are put in place. This stance is replicated by the borough's highways officers, and such measures will be agreed by way of S106 agreement, should permission be granted.

- 7.112 The trip generation profile for the operational use shows that trips are expected across the day, rather than in a tidal AM / PM peak pattern, the most intensive period for vehicle trips would be during the middle of the day.

The assessment does show that would be a net trip generation increase:

- AM 3 hour = +90 (out of 663) two way trips by car driver / passenger and motorbike
- PM 3 hour = +62 (out of 479) two way trips by car driver / passenger and motorbike

- 7.113 TfL have confirmed that this would have a small impact upon local traffic flows, but have stressed the importance of recognising its cumulative impacts, nonetheless. TfL considers that mitigation, which promotes local connectivity should be prioritised rather than mitigation towards potential significant highway interventions which will need to be secured in the A12 Corridor. There are potential improvements to local connectivity which form part of wider approach to west-east strategic connectivity which should be addressed in line with London Plan policy and emerging Leaside AAP Policy. The Devas Street / Twelvetrees Crescent highway axis does have very limited pedestrian and cycle provision, and west-east pedestrian and cycle routes need to use other routes and north-south routes promoted to avoid the A12.

- 7.114 In recognition for the need to mitigate against the harm caused by increased traffic flows, associated with the proposals, the applicant team have agreed to make a financial contribution of £120,000, which is to go towards improvements to the Empson Street A12 Subway. The subway was identified by TfL, as it is in the immediate vicinity of the site and close to the D8 Bus Stop (which is also closest to the site), as well as providing linkages to emerging local residential sites situated on the east side of the A12. It has been agreed that the financial contribution be used to for ambient improvements to flooring, tiles, and lighting to improve conditions for future occupiers of the site and support west-east movements, as well as personal safety.

Limehouse Cut Tow Path

- 7.115 The application site sits north of the Limehouse Cut. The Limehouse Cut is inclusive of a tow path on its south side which serves as a pedestrian and cycle route that promotes east/west travel within the borough and provides a connection to Newham also. The site falls within the Tower Hamlets Green Grid Buffer Zone and is thus required to contribute to linking and improving the connectivity of the green grid links in accordance with the Green Grid Strategy and the Mayor of London's All London Green Grid SPD, as required by policy D.OWS3 of the Tower Hamlets Local Plan (2020).
- 7.116 The proposals are supported by a Transport Assessment and a Framework Travel Plan for the site. Both of which serve to support the modal shift from vehicular travel to cleaner, greener modes, such as walking and cycling. Additionally, the proposals, if permitted are expected to increase the number of jobs provided on site from 55, to 232 full time roles. It is reasonable therefore to assume that the proposals will result in increased use of the Limehouse Cut Tow Path from employees either travelling to

and from the site, increased operational use arising from last mile deliveries, or employees visiting the site during breaks and lunch hours.

- 7.117 The Canal and River Trust have engaged with the application and are concerned that the proposals, if permitted, would result in increased wear and tear of the Tow Path. The Canal and River Trust consider that £60,000 would be a reasonable contribution towards local towpath works to support travel to and from the development, and to mitigate the impacts of additional users. This request was supported by TfL also, who identified the site as a potential site for mitigation measures. The applicant team have committed to contributing to improvements to the Limehouse Cut, and the contribution will be secured by way of a S106 agreement should permission be granted.

Demolition and Construction Traffic

- 7.118 The application is supported by an Outline Construction Logistics Plan. Condition will be applied to secure detail of a final Construction Logistics Plan, a Construction Environmental Management Plan and a Construction Traffic Management Plan to minimise disruption to the local highways, and also mitigate causing undue levels of harm by way of increased noise and air pollution.

Summary

- 7.119 As detailed in the sections above, it is considered that the proposed development would comply with the planning policies and objectives of the Development Plan, which seek to ensure that the impact of development on the highways network has been minimised, and also promotes a modal shift to cleaner modes of transport, including active travel. Additionally, S106 obligations have been agreed as deemed appropriate, to mitigate any harm which may arise from an increased trip generation.

Waste Management

- 7.120 All new development must 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 whole, in compliance with policy D.MW3 of the Tower Hamlets Local Plan (2020).
- 7.121 A Transport Assessment and Delivery and Servicing Plan including Waste Management plan has been submitted as part of the application. The waste storage requirements have been calculated as outlined within Appendix 4: Waste collection standards of Tower Hamlets Local Plan (2031).
- 7.122 The waste storage capacity has been assessed by LBTH Waste Management Services who have confirmed that appropriate facilities have been provided to store individual waste streams within each unit, and that the management of waste collection services, noting the presence of waste plan coordinator, is considered acceptable. Officers propose to apply condition to secure detail of a final waste management strategy and a separate management plan for the whole site, which will serve to ensure that tenants are required to cooperate with the site wide waste management plan.

Environment

- 7.123 The proposed development represents Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact

Assessment) Regulations 2017 (as amended) and is accompanied by Environmental Statement (ES) coordinated by Trium.

- 7.124 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.
- 7.125 The submitted ES assesses the environmental impacts of the development under the following topics:
- Air Quality
 - Archaeology
 - Climate Change
 - Noise and Vibration
 - Traffic and Movement
- 7.126 The ES was reviewed alongside multiple other planning documents, including:
- LBTH Scoping Opinion
 - Standalone Health Impact Assessment
 - Site Masterplan
- 7.127 The ES has been reviewed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations).
- 7.128 The application has been supported by an ES Volume 1 (March 2024), ES Volume 2 Technical Appendices (March 2024) and a Non-Technical Summary (March, 2024), and three sets of review responses which were not considered to be 'further information' under Regulation 25.
- 7.129 The Council appointed Temple Group to independently examine the ES to confirm whether the ES satisfies the Regulations. This is supported by review reports consisting of the Interim Review Report, May 2024, and the Final Review Report 001 (12 August, 2024) and Final Review Report 002 (22/08/2024).
- 7.130 The most recent clarifications were sought in response to topics pertaining to noise and vibration, the location of machinery associated with the circular economy hub and whether or not industrial uses would operate at night. These were found to be acceptable, as were all previous clarifications relating to all topics covered within.
- 7.131 The Council's EIA Officer and the Council's appointed EIA consultants have confirmed that submitted, including subsequent ES submission as set out above, meets the requirements of the EIA Regulations.
- 7.132 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the proposed development, which forms the basis of the assessment presented in the report.
- 7.133 Appropriate mitigation and monitoring measures as proposed in the ES will be secured through planning conditions and planning obligations. The environmental information comprises the ES, including further information and all other information, any representations made by consultation bodies and by any other person about the environmental effects of the proposed development.

Air Quality

- 7.134 London Plan policy SI1 and Tower Hamlets Local Plan policy D.ES2 require major developments to submit an Air Quality Assessment demonstrating to meet or exceed at least Air Quality Neutral standard. London Plan policy also requires EIA developments to consider ways to maximise benefits to local air quality and measures and design features to reduce exposure to pollution.
- 7.135 The submitted information relating to air quality has been included in Chapter 7, of Environmental Statement: Volume 1 and Appendix 5 of Environmental Statement: Volume 2. The assessment has concluded that impacts demolition and construction will not have significant effects. It is considered that these measures would be temporary, and will be appropriately managed through the application of relevant planning conditions, pertaining to a Construction Environmental Management Plan, a Dust Management Plan, a Construction Logistics Plan, Non-Road Mobile Machinery emission standards and compliance with the Dust from Demolition and Construction SPG
- 7.136 Road traffic emissions will be generated when the development is completed and operational. Operational road traffic emission has the potential to cause permanent long-term effects. However, given the site's relative location to the A12, in an area recognised to be of poor air quality, the impacts of the proposals are negligible. The development would not have a significant impact upon the predicted annual mean concentrations of nitrogen dioxide in 2026.

Archaeology

- 1.137 London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- 1.138 Policy S.DH3 of the Tower Hamlets Local Plan (2020) goes onto say that applications affecting the significance or the archaeology will be required to provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation. Where development includes or has the potential to include heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, field evaluation will be required. Where harm can be fully justified, we Tower Hamlets will require archaeological excavation and/or recording as appropriate, followed by analysis and publication of the results.
- 1.139 The site is located on the Tier 3 'Lea Valley' Archaeological Priority Area, designated by the London Borough of Tower Hamlets, which is an area of 225 hectares contained which is an area of 225 hectares containing paleoenvironmental evidence for past wetland and riverine environments and potential for new discoveries of well-preserved prehistoric sites. It was also an extensive area of historic industry in the medieval and post medieval periods.
- 1.140 The ES outlines the significant effects are likely. 'Significant' environmental effects are those that are moderate or major in scale. Effects that are 'not significant' are minor or negligible in scale.
- 1.141 Although the site is an APA, geotechnical investigations suggest its archaeological and paleoenvironmental interest is very limited. Historic England's GLAAS have

requested that condition be applied to ensure that no development shall take place, other than to ground level (no grubbing out of foundations shall take place) until a stage 1 written scheme of investigation has been submitted to the local planning authority in writing to the local planning authority, identifying any heritage assets of archaeological interest. If assets are found, then a stage 2 written scheme of interest shall be submitted to and approved in writing by the local planning authority.

Climate Change

- 1.142 At a national level, the National Planning Policy Framework sets out that planning plays a key role in delivering reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The climate change policies as set out in the London plan 2021 and the Tower Hamlets Local Plan collectively require new development to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 1.143 Policy SI2 of the London Plan (2021) requires major development to be net zero. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy.
1. Be lean: use less energy and manage demand during operation
 2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 3. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 4. Be seen: monitor, verify and report on energy performance
- 1.144 Policy D.ES7 of the Tower Hamlets Local Plan (2020) requires zero carbon emission development to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site, and the remaining carbon dioxide emission to 100%, to be offset through a cash in lieu contribution. This is applicable to all developments.
- 1.145 The submitted Energy Assessment, compiled by Wakins Payne (March, 2024) sets out that the proposals seek to reduce energy demand through the use:
- Energy efficiency measures, which will be applied to the MOT Building and new build warehouses.
 - Efficient delivery of heating and cooling through air source heat pumps
 - Renewable energy generating technologies including (anticipated) 121kWp producing photovoltaic array. The specification of biosolar installation should be considered to maximise the benefits associated with the PV installation.
- 1.146 The carbon offset has been based on the energy consumption during the operation of the Proposed Development and does not account for that which would be produced during the construction phase of development. The total CO2 reduction would equate 19.9 tonnes/CO2 per annum. This means that to comply with D.ES7 there is a requirement to provide a carbon offsetting contribution of £62,901, which would account for the annual carbon shortfall of 22.07 tonnes per annum for a total of 30 years.
- 1.147 LBTH Sustainability officers have highlighted that that in the energy assessment the peak electrical output of the PV panels was described as being for illustrative

purposes only. The peak electrical output and energy generation per year is important for the energy assessment and calculations, as it directly relates to the anticipated CO2 emissions reductions proposed, and thus the required carbon offset financial contribution.

- 1.148 If permission is granted, officers propose to apply condition, as recommended by LBTH Energy and Sustainability Officers, to ensure that PV energy generation exceeds a minimum of 121kWp. Additionally, conditions will be applied to ensure that the proposals are designed and built out to achieve a BREEAM excellent (70%).
- 1.149 In consideration of the proposal's impact upon climate change, officers recognise that the building design, and use of thermal efficient building materials outlined within the Design and Access Statement, including the re-use of existing building materials, will be important in minimising the site's overall impact in terms of greenhouse gas emissions. Thus, it officers will seek to ensure that environmental factors are considered when securing details of final materials by way of condition.

Noise and Vibration

- 1.150 Policy D14 of the London Plan (2021) requires development to should be designed appropriately, to where possible prevent or otherwise mitigate opportunities for noise and vibration to cause disturbances and adversely affect the quality of life of those living in the vicinity of development. Policy D13, further states that development should not normally be permitted where it has not been clearly demonstrated how noise and other nuisances will be mitigated and managed.
- 1.151 Tower Hamlets Local Plan (2020) policy D.DH8 further outlines that development must not result in creating unacceptable levels of noise and vibration both during the construction phase and subsequent lifetime of the development.
- 1.152 Policy D.ES9 further required development to; a). use the most appropriate, layout, orientation, design and use of buildings to minimise noise and vibration impacts; b). identify/outline mitigating measures to manage noise and vibration from new development, including during the construction phase; c). separate noise-sensitive development from existing operational noise and; d). provide a noise assessment where noise generating development or noise-sensitive development is proposed.
- 1.153 The Environmental Statement outlines that during the demolition and construction phase Moderate Adverse (Significant) effects are likely to effect Empson Street Studios during substructure works and Brickfield Studios during landscaping works. The adverse affects are however temporary and limited in geographic extent. Officers consider it pertinent to note that the worst impacted buildings are not residential in nature.
- 1.154 The operational industrial noise assessment has been based on 'typical' industrial activities which have been assumed to occur within operational zone in the centre of the site. The operational industrial noise assessment indicates that there is potential for significant adverse impacts (pre-mitigation), based on the scenarios considered for the site. However, with mitigation factors measures, such as the inclusion of screening and similar measures (to be secured by way of condition), all affects would be reduced to minor adverse or negligible (non significant).

Additionally, as the exact use of the industrial units is not known at this time, it is proposed that condition be applied to ensure that the proposals do not give rise to unacceptable impacts pertaining to noise and vibration disturbances for the nearest residential receptors. Noise Impact Assessments will need to be submitted ahead of occupation for each individual unit, prior to its occupation by the end user.

Land Contamination

- 1.155 Where development is proposed on contaminated land or potentially contaminated land, a desk study and site investigation in line with current guidance is required and remediation proposals agreed to deal with the contamination before planning permission.
- 1.156 The Environmental Statement has identified that Asbestos fibres were present within six samples of made ground of a total of 39 tests. The analyses of these samples show presence of fibres of crocidolite, chrysotile and amosite, with a maximum of 0.005 % by weight present in the sample from TP7 at 0.70 m bgl.
- 1.157 Concentrations of heavy metals, VOCs and PAHs recorded have been measured to exceed the controlled waters assessment criteria within the groundwater samples collected from site. Furthermore, the presence of buried fuel tanks present in the central and northwestern areas of the site were also noted. Additionally, the Phase 2 investigation detected a single exceedance of lead within a sample of made ground from TP04, at a depth of 0.5 m to 0.6 m. Given the proposed commercial development at the site, the 'Phase 2 Geo-environmental and Geotechnical Report's
- 1.158 Environmental Health Contaminated Land have been consulted in response to the proposals. Whilst they do not object to the development on the basis of contaminated land, they do request that appropriate conditions are applied should permission be granted.

Flood Risk and Sustainable Urban Drainage Systems

- 1.159 Development is required to reduce the risk of surface water flooding, through demonstrating how it reduces the amount of water run-off and discharge from the site through the use of appropriate drainage system techniques.
- 1.160 The proposals are inclusive of a Drainage Strategy Report, produced by Heyne Tillett Steel. Additionally, officers note that SUDs have been incorporated into the extensive landscaping strategy. If planning permission is to be granted, officers propose to secure detail of an updated sustainable urban drainage strategy, which reflects the final choice of materials and plants and vegetation on site.

Biodiversity

- 1.161 As outlined within policies S.ES1 and D.ES3, development is expected to enhance biodiversity within the borough. It should retain habitats and features of biodiversity value, or, if this is not possible, replace them within the development, as well as incorporate additional measures to enhance biodiversity, proportionate to the development proposed.
- 1.162 Policy S.OWS2 and D.OWS4 further seek to preserve and enhance existing biodiversity and wildlife that exists within the borough and its water spaces, whilst also enhancing the relationship shared between said spaces and the public.
- 1.163 Site of Importance for Nature Conservation (SINCs) should be protected, as necessitated under policy G6 of the London Plan (2021). Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 1.164 Policy D.ES3 of the Tower Hamlets Local Plan further establishes the requirement for development to protect and enhance biodiversity. Major development is required to

submit an ecology assessment demonstrating biodiversity enhancement that contribute towards the objectives of the Tower Hamlets Biodiversity Action Plan and the Thames River Basin Management Plan.

- 7.165 An Ecological Impact Assessment has been produced by Logika Noise Air Quality Consultants. It outlines that the site has an existing Biodiversity Net Gain Value of 0.06. Although the proposals will result in the loss of nearly all existing habitats on site, officers conclude that the total loss would be minimal. In any instance, the proposals would if permitted increase the BNG value to 2.39 habitat units. It is proposed that the biodiversity enhancements recognised within the Ecological Impact Assessment and Landscape Statement are secured by way of s.106 agreement, to ensure that they are maintained for by the developer. Furthermore, a pre-commencement condition securing detail of an updated bat survey would be required plus a further Biodiversity Net Gain Condition, in accordance with the Environmental Act (2021).
- 7.166 The application is inclusive of Arboricultural Survey Impact Assessment and Method Statement Report. The borough's Senior Arboricultural Officer has had regard to proposals. No objections have been raised and officer's concede that the loss of T20, T14, G16, T17, S18 and S19 can suitably be mitigated by the proposed planting. In any instance the proposals would result in a significant increase in the total number of trees (47) in the local area. Officers therefore consider the proposals to be compliant with policy G7 of the London Plan (2021) and policy D.ES3 of the Tower Hamlets Local Plan (2020). Conditions will however be applied to ensure that appropriate steps are taken to mitigate the loss of further trees during the construction phase of development.

Statement of community involvement

- 7.167 The applicant team have engaged in proactive and meaningful public consultation, throughout the lifetime of the project.
- 7.168 As part of the public engagement, the applicant team have engaged with current tenants in order to support them in their relocation. Officers consider that the approach taken is consistent with the overarching intentions of part 6, of Policy D.EM4, which states that development which is likely to adversely impact or displace an existing building must find a suitable replacement accommodation within the borough unless it can be shown that the needs of business are better met elsewhere.

Human Rights and Equalities

- 7.169 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and Officers consider it to be acceptable.
- 7.170 The proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

- 8.1 That planning permission is GRANTED subject to the prior completion of a legal agreement to secure the following planning obligations, and the application of conditions detailed below.
- 8.2 Heads of Terms:
- Carbon Offsetting Contribution: £62,901

- Biodiversity Enhancements
- Affordable Workspace: Onsite provision totalling 1,198sqm
- Circular Economy Hub: Nil rent for no less than 10 years
- Construction Phase Skills and Training: £47,944.00
- Local Enterprise: 20% of total value of contracts
- End Use Employment: £134,706.95
- Apprenticeships: x5 apprenticeships
- Electric Vehicle Charging
- Travel Plan
- 278 Agreement
- Improvements to Empson Street A12 Underpass: £120,000
- Improvements to Limehouse Cut tow path: £60,000

8.3 Planning Conditions

Compliance

1. 3 Years Deadline for Commencement of Development.
2. Development in Accordance with Approved Plans.
3. Restrictions on Demolition and Construction Activities:
 - a. All works in accordance with Tower Hamlets Code of Construction Practice
 - b. Standard hours of construction and demolition
 - c. Air quality standards for construction machinery
 - d. Ground-borne vibration limits
 - e. Noise pollution limits.
4. Noise from Plant
5. Subdivision of industrial units, via the introduction of new, or extension of existing mezzanines is prohibited unless otherwise granted permission from the Local Planning Authority.
6. Removal of Permitted Development Rights pertaining to flexible Class E Uses (notwithstanding Class E(g)(ii)/E(G)(iii)),
7. All removal of trees, hedgerows, shrubs or tall herbaceous vegetation shall be undertaken between September and February inclusive.
8. Compliance Considerate Constructors Scheme
9. Section 61 Consent (Noise and Vibration)
10. Where the removal of trees is agreed, a minimum 2:1 net gain for any trees removed must occur, and these are to be planted with a stock size of Semi Mature in line with BS 3936.
11. Protection of tree routes, to prevent the loss of any unauthorised trees.
12. Noise levels pertaining to operation of the units must not exceed specified levels (day and night time, specific)
13. Building services to achieve specified LTBH noise limits
14. Non-Road Mobile Machinery
15. Fire Safety

Pre-Commencement

16. Site Environmental Management Plan (SEMP)
17. Construction Environmental Management Plan
18. Dust Management Plan
19. Arboricultural
20. Submission of a tree planting methodology in line with BS 8542

21. Remedial Soil Study
22. Land Contamination
23. A Monitoring and Maintenance Plan (Contaminated land)
24. Submission of an updated SUDs strategy
25. Biodiversity Net Gain
26. An updated bat survey

Pre-Ground Works

27. Two stage archaeological investigation: No demolition below ground level (no grubbing out works) until a Written Scheme of Investigation has been submitted to and approved in writing by the LPA.

Pre-Occupation

28. Materials
29. Updated landscaping strategy
30. Updated ecological statement, including details of biodiversity enhancements
31. Lighting Strategy (lighting equipment, luminosity, and on/off times)
32. Cycle Parking (full details of cycle parking and lifetime upkeep of parking arrangements)
33. Refuse storage (full details of refuse storage areas)
34. Individual Noise Impact Assessments for each individual unit
35. Site Transport and Servicing Management Plan
36. Site wide car parking plan, to provide details as to how parking will be managed to ensure it relates to operation only, and that only blue badge holders may utilise blue badge parking bays.
37. Details relating to Photovoltaic Panels requiring that panels must generate no less than 121kWP.
38. Post Completion Report submitted to demonstrate 'Excellent' BREEAM rating
39. Post completion report to be submitted to demonstrate CO2 savings have been delivered.
40. Updated Waste Management Plan
41. Updated Circular Economy Hub management plan
42. Final site wide management plan, including details of information and instructions provided to tenants.

(Drawings: Landscape):

Existing Site Plan 530-LP-GF-GA-001 A1 1:500 P1
Tree Works 530-LP-GF-GA-005 A1 1:500 P1
Landscape General Arrangement Plan 530-LP-GF-GA-010 A1 1:500 P1
Urban Greening Factor 530-LP-GF-GA-050 A1 1:500 P1
Detailed Plan: Entrance Area 530-LP-GF-GA-200 A1 1:100 P1
Detailed Plan: Yard Arrival 530-LP-GF-GA-201 A1 1:100 P1
Detailed Plan: Towcester Road 530-LP-GF-GA-202 A1 1:100 P1

(Drawings: Buildings)

AB-HTL-A1-ZZ-DR-A-00001 Site Location Plan
FAB-HTL-A1-ZZ-DR-A-02100 Demolition Plan
FAB-HTL-SW-XX-DR-A-01001 Existing Site Plan
FAB-HTL-SW-XX-DR-A-01200 Existing Site Sections - North/South
FAB-HTL-SW-XX-DR-A-01201 Existing Site Sections - East/West
FAB-HTL-A1-ZZ-DR-A-00010 Proposed Site Plan

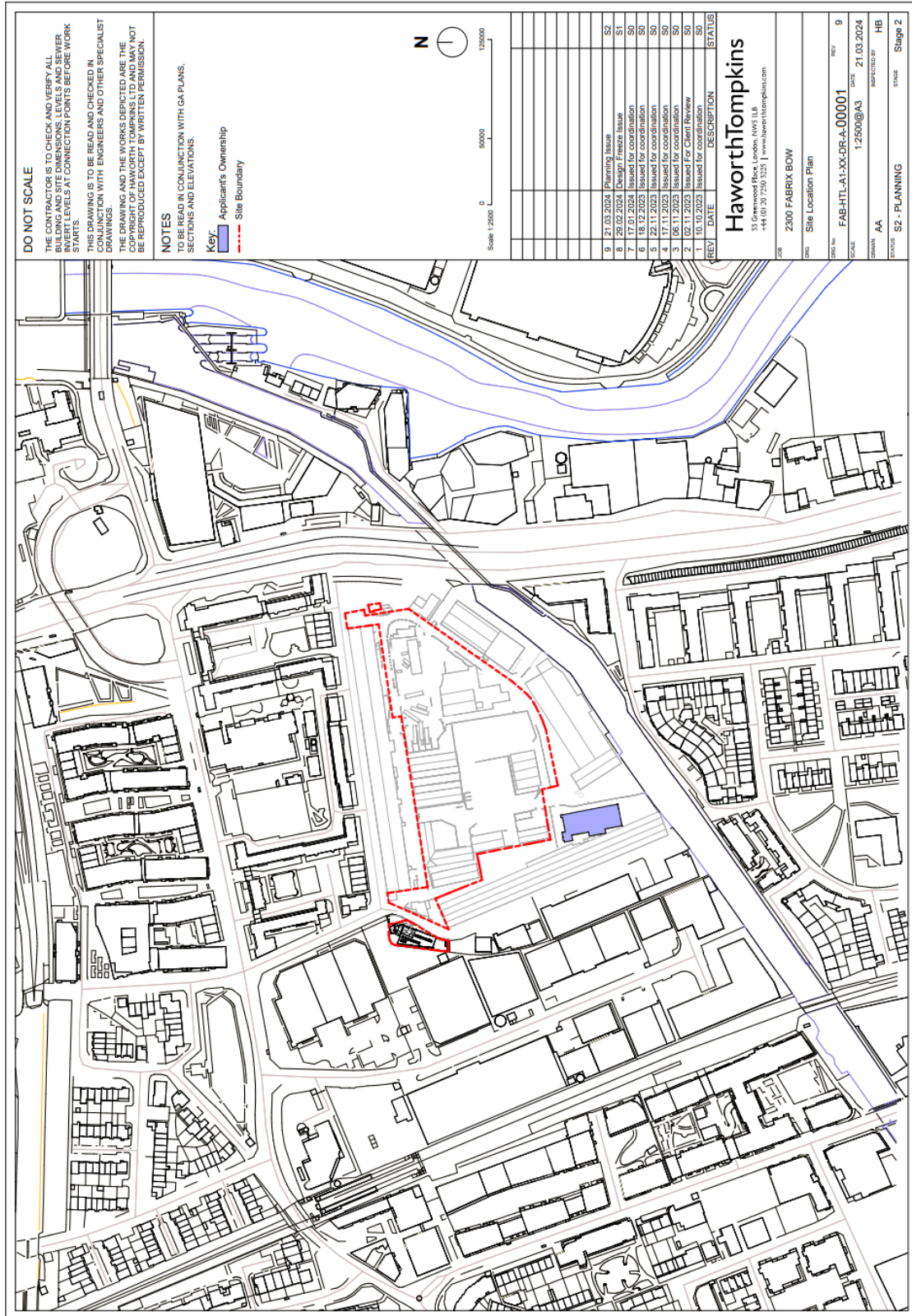
FAB-HTL-A1-ZZ-DR-A-00011 Proposed Site Levels Strategy
FAB-HTL-A1-00-DR-A-00100 Proposed Ground Floor Plan
FAB-HTL-A1-MZ-DR-A-00101 Proposed Mezzanine Floor Plan
FAB-HTL-A1-MZ-DR-A-00102 Proposed Second Floor Plan
FAB-HTL-A1-RF-DR-A-00103 Proposed Roof Plan
FAB-HTL-A1-XX-DR-A-00110 Proposed Northern Block Yard Layout
FAB-HTL-A1-XX-DR-A-00111 Proposed Southern Block Yard Layout
FAB-HTL-A1-00-DR-A-00112 Proposed Cycle Store
FAB-HTL-A1-00-DR-A-00120 Security Office-Plans
FAB-HTL-C1-XX-DR-A-01100 Existing Ground & First Floor Plan MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-RF-DR-A-01110 Existing Roof Plan MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-00-DR-A-00100 Proposed Ground & First Floor Plan MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-RF-DR-A-00102 Proposed Roof Plan MOT Building - Affordable Workspace & CEH
FAB-HTL-A1-XX-DR-A-00200 Proposed Sections - 01
FAB-HTL-A1-XX-DR-A-00201 Proposed Sections - 02
FAB-HTL-A1-XX-DR-A-00202 Proposed Sections - 03
FAB-HTL-A1-XX-DR-A-00203 Proposed Sections - 04
FAB-HTL-C1-XX-DR-A-01200 Existing Sections MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-XX-DR-A-00200 Proposed Sections MOT Building - Affordable Workspace & CEH
FAB-HTL-A1-XX-DR-A-00300 Proposed Elevations - Northern Block
FAB-HTL-A1-XX-DR-A-00301 Proposed Elevations - Southern Block
FAB-HTL-A1-XX-DR-A-00302 Proposed Elevations - East and West
FAB-HTL-A1-XX-DR-A-00310 Proposed Elevations - Typical Bay
FAB-HTL-A1-XX-DR-A-00311 Proposed Elevations - Facades
FAB-HTL-A1-XX-DR-A-00312 Proposed Bay Study - Service Yard
FAB-HTL-A1-XX-DR-A-00313 Proposed Bay Study - Street Side
FAB-HTL-A1-XX-DR-A-00320 Proposed Elevations - Security Office
FAB-HTL-C1-XX-DR-A-01300 Existing North & South Elevations MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-XX-DR-A-01301 Existing East & West Elevations MOT Building – Affordable Workspace & CEH
FAB-HTL-C1-XX-DR-A-00300 Proposed North & South Elevations MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-XX-DR-A-00301 Proposed East & West Elevations MOT Building - Affordable Workspace & CEH
FAB-HTL-C1-XX-DR-A-00310 Proposed Facades MOT Building - Affordable Workspace & CEH
FAB-HTL-A1-ZZ-DR-A-01500 Existing 3D Isometric View 1
FAB-HTL-A1-ZZ-DR-A-01501 Existing 3D Isometric View 2
FAB-HTL-ZZ-XX-DR-A-00500 Proposed Isometric View 1 - Site Wide
FAB-HTL-ZZ-XX-DR-A-00501 Proposed Isometric View 2 - Site Wide
FAB-HTL-ZZ-XX-DR-A-00502 Proposed Isometric Typical Bay
FAB-HTL-C1-XX-DR-A-00503 Proposed Isometric View 3 - Site Wide
FAB-HTL-A1-ZZ-SH-A-00000 Area Schedule - Industrial Units
FAB-HTL-A1-XX-SH-A-00003 Area Schedule NIA - Industrial Units
FAB-HTL-A1-XX-SH-A-00004 Room Schedule - Industrial Units
FAB-HTL-C1-ZZ-SH-A-00000 Area Schedule - MOT Building - Affordable Workspace & CEH
FAB-HTL-XX-XX-SP-A-000100 Outline Specification
FAB-HTL-A1-ZZ-M3-A-00001 Revit Model - A1 - Main Industrial Units

FAB-HTL-B1-ZZ-M3-A-00001 Revit Model - B1 - Scorpio House
FAB-HTL-C1-ZZ-M3-A-00001 Revit Model - C1 - Incubator and Management Buildings
FAB-HTL-SW-ZZ-M3-A-00001 Revit Model - SW - Site Wide (Context)

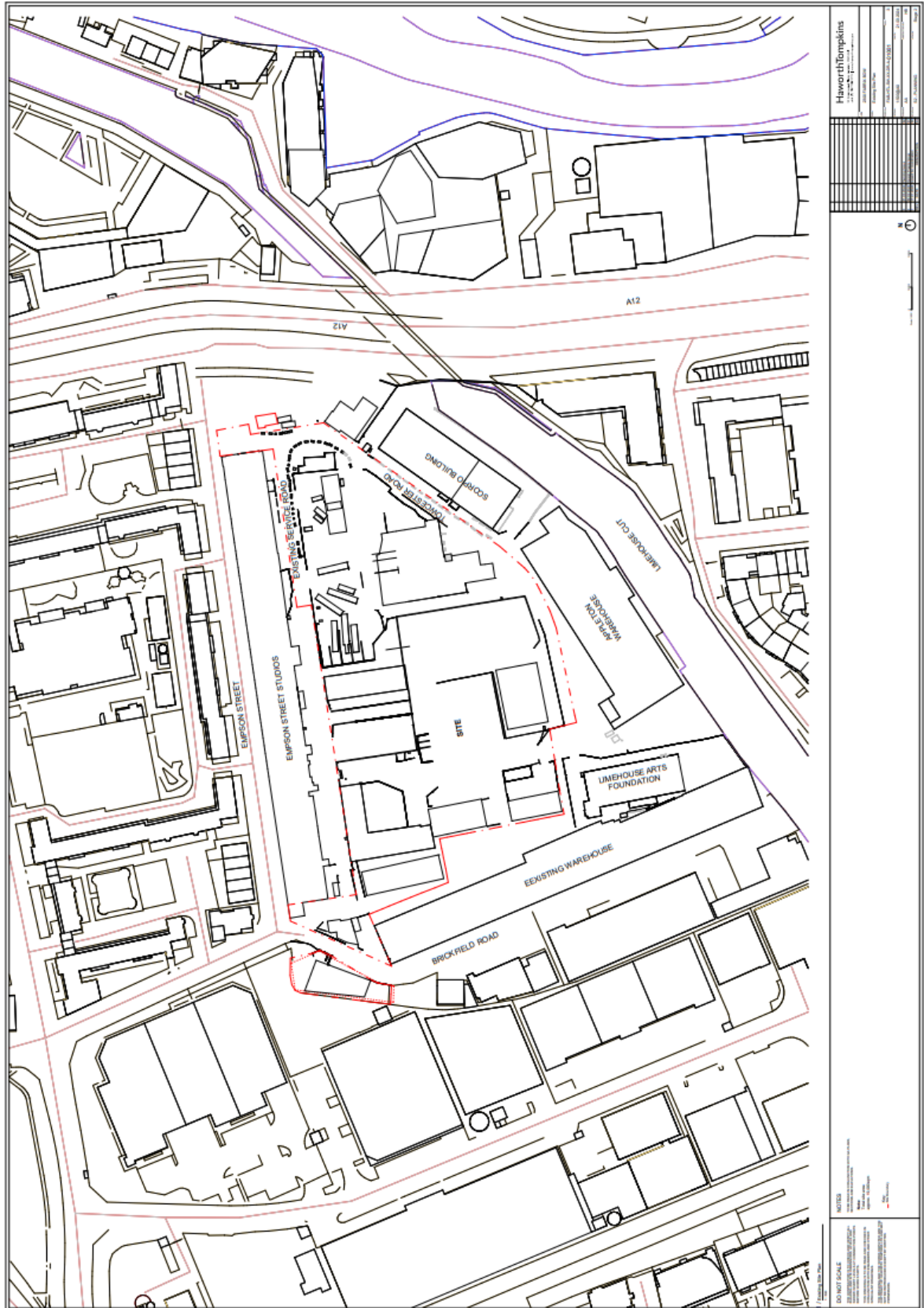
Submitted documents):

Archaeological Desk Based Assessment, dated March 2024 (and ADBA Supplement dated February 2024)
Circular Economy Statement, dated 19 March 2024
Climate Change Risk and Vulnerability Assessment, dated 19 March 2024
Covering Letter, dated 25 March 2024
Design and Access Statement, dated March 2024
Drawing Issue Register, dated 22 March 2024
Drainage Strategy, dated March 2024
Ecological Impact Assessment, dated 22 March 2024
Energy Strategy (and Appendices) dated March 2024
Environmental Statement, dated March 2024
Fire Statement, dated March 2024
Flood Risk Assessment, dated 19 March 2024
Framework Travel Plan, dated March 2024
Phase 2 Geo-Environmental and Geotechnical Contamination Report, dated December 2023
Health Impact Assessment, dated March 2024
Heritage, Townscape and Visual Impact Appraisal, March 2024
Landscape Statement, dated March 2024
Lighting Assessment, dated March 2024
Outline Operational Management Plan, dated March 2024
Planning Statement, dated March 2024
Tenant Management Plan and Relocation Strategy, dated March 2024
Reuse, Recycle and Waste Plan, dated 21 March 2024
Statement of Community Involvement, dated March 2024
Security Statement, dated 18 March 2024
Outline Site Environmental Management Plan, dated March 2024
Site Waste Management Plan, dated March 2024
Sustainability Statement, dated 20 March 2024
Transport Assessment, dated 22 March 2024
Outline Construction Logistics Plan, dated 21 March 2024
Delivery, Servicing and Waste Management Plan, dated March 2024
Tree Survey, dated February 2024
Utilities Assessment, dated March 2024
Waste Management Strategy, dated 21 March 2024
Whole Life Carbon Statement, dated 19 March 2024
Applicant Response to London Fire Brigade, date 21 June 2024
Applicant Response to TfL, dated 19 July 2024
Applicant Response to EIA comments, dated 25 July 2024 and 19 August 2024
Circular Economy Hub Note, dated July 2024

Appendix 1.1 – Site Location Plan

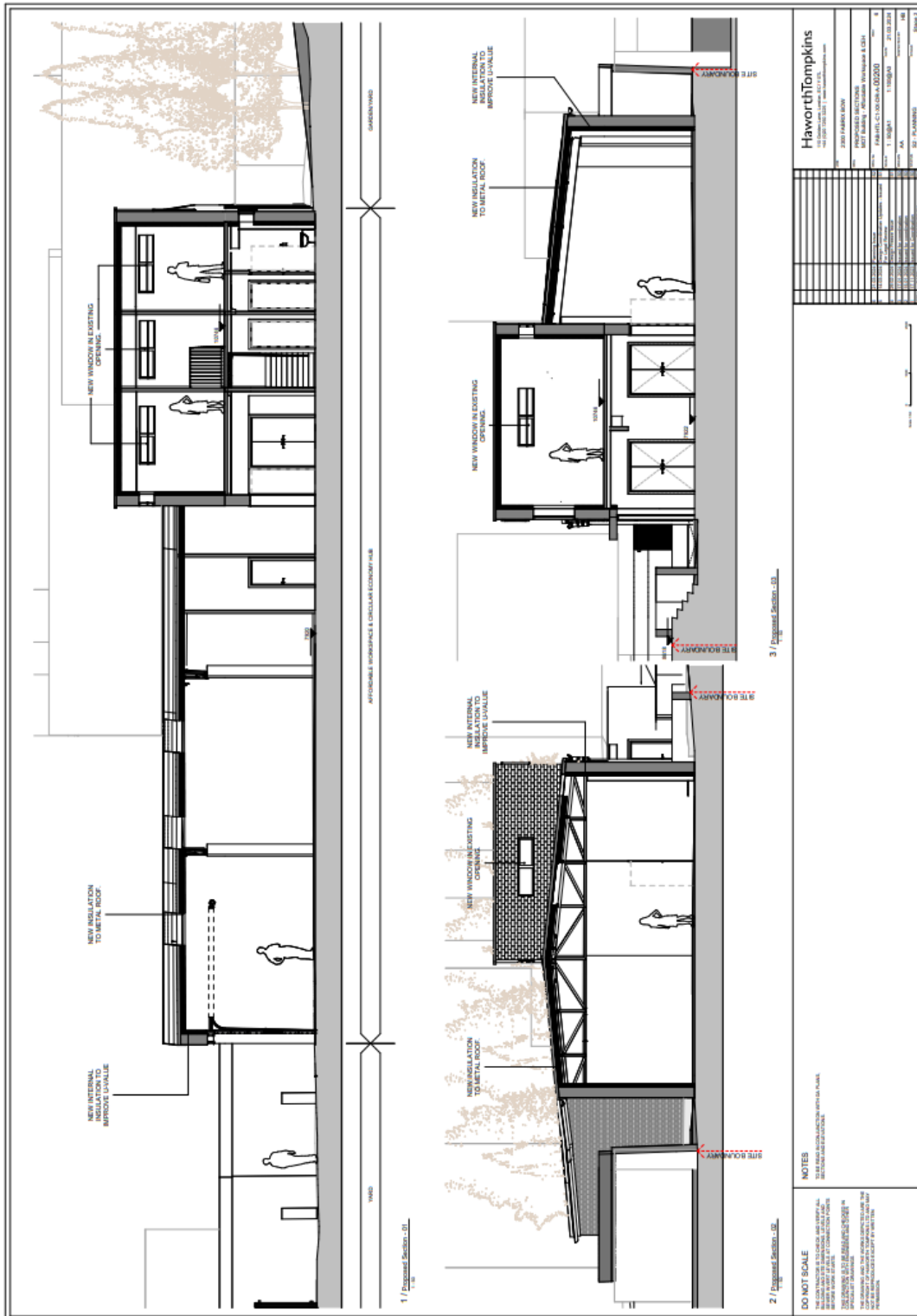


Appendix 1.4 – Existing Site Plan



Haworth Tompkins
 177, 179, 181, 183, 185, 187, 189, 191, 193, 195, 197, 199, 201, 203, 205, 207, 209, 211, 213, 215, 217, 219, 221, 223, 225, 227, 229, 231, 233, 235, 237, 239, 241, 243, 245, 247, 249, 251, 253, 255, 257, 259, 261, 263, 265, 267, 269, 271, 273, 275, 277, 279, 281, 283, 285, 287, 289, 291, 293, 295, 297, 299, 301, 303, 305, 307, 309, 311, 313, 315, 317, 319, 321, 323, 325, 327, 329, 331, 333, 335, 337, 339, 341, 343, 345, 347, 349, 351, 353, 355, 357, 359, 361, 363, 365, 367, 369, 371, 373, 375, 377, 379, 381, 383, 385, 387, 389, 391, 393, 395, 397, 399, 401, 403, 405, 407, 409, 411, 413, 415, 417, 419, 421, 423, 425, 427, 429, 431, 433, 435, 437, 439, 441, 443, 445, 447, 449, 451, 453, 455, 457, 459, 461, 463, 465, 467, 469, 471, 473, 475, 477, 479, 481, 483, 485, 487, 489, 491, 493, 495, 497, 499, 501, 503, 505, 507, 509, 511, 513, 515, 517, 519, 521, 523, 525, 527, 529, 531, 533, 535, 537, 539, 541, 543, 545, 547, 549, 551, 553, 555, 557, 559, 561, 563, 565, 567, 569, 571, 573, 575, 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Appendix 1.7 – Proposed Sections MOT Building - Affordable Workspace & CEH



HaworthTompkins
 100 WEST 25TH STREET, SUITE 100
 DENVER, CO 80202
 TEL: 303.733.1234
 WWW.HAWORTH-TOMPKINS.COM

NO.	REVISION	DATE
1	ISSUED FOR PERMITTING	11/15/2023
2	ISSUED FOR PERMITTING	11/15/2023
3	ISSUED FOR PERMITTING	11/15/2023

PROJECT INFORMATION
 PROJECT NAME: AFFORDABLE WORKSPACE & CELLULAR ECONOMY HUB
 PROJECT ADDRESS: 1100 EAST 17TH AVENUE, DENVER, CO 80202
 CLIENT: HAWORTH-TOMPKINS
 ARCHITECT: HAWORTH-TOMPKINS
 DATE: 11/15/2023

NOTES
 1. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF DENVER PERMITS AND ORDINANCES.
 2. THE DRAWING IS FOR PERMITTING PURPOSES ONLY.
 3. THE DRAWING IS NOT TO BE USED FOR CONSTRUCTION WITHOUT THE WRITTEN APPROVAL OF HAWORTH-TOMPKINS.

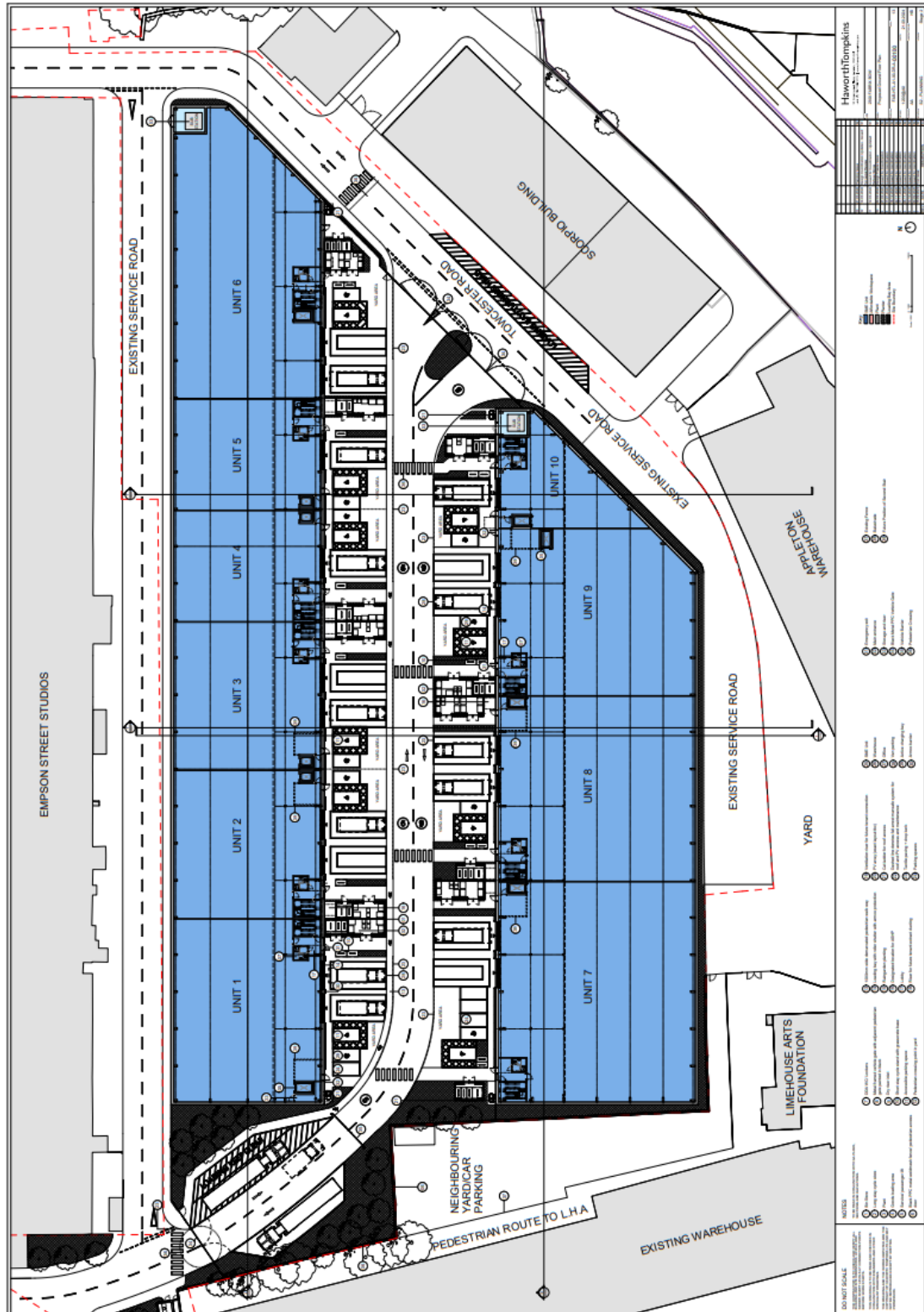
DO NOT SCALE
 ALL DIMENSIONS SHALL BE AS SHOWN UNLESS OTHERWISE NOTED.
 ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF DENVER PERMITS AND ORDINANCES.

1 / Proposed Section - 01
 AFFORDABLE WORKSPACE & CELLULAR ECONOMY HUB
 WARD

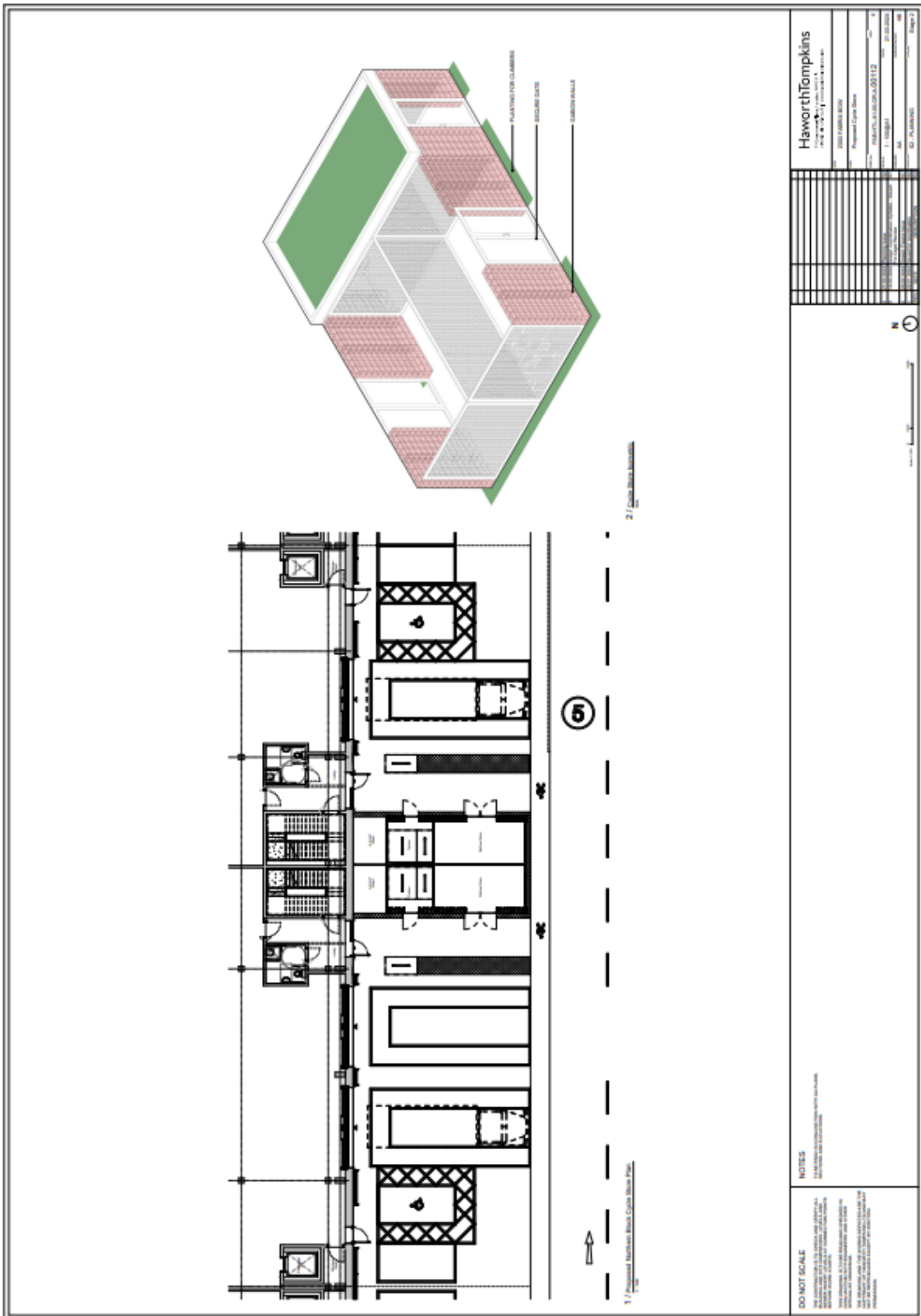
2 / Proposed Section - 02
 AFFORDABLE WORKSPACE & CELLULAR ECONOMY HUB
 WARD

3 / Proposed Section - 03
 AFFORDABLE WORKSPACE & CELLULAR ECONOMY HUB
 WARD

Appendix 1.8 – Proposed Ground Floor Plan



Appendix 1.9 – Proposed Cycle Store

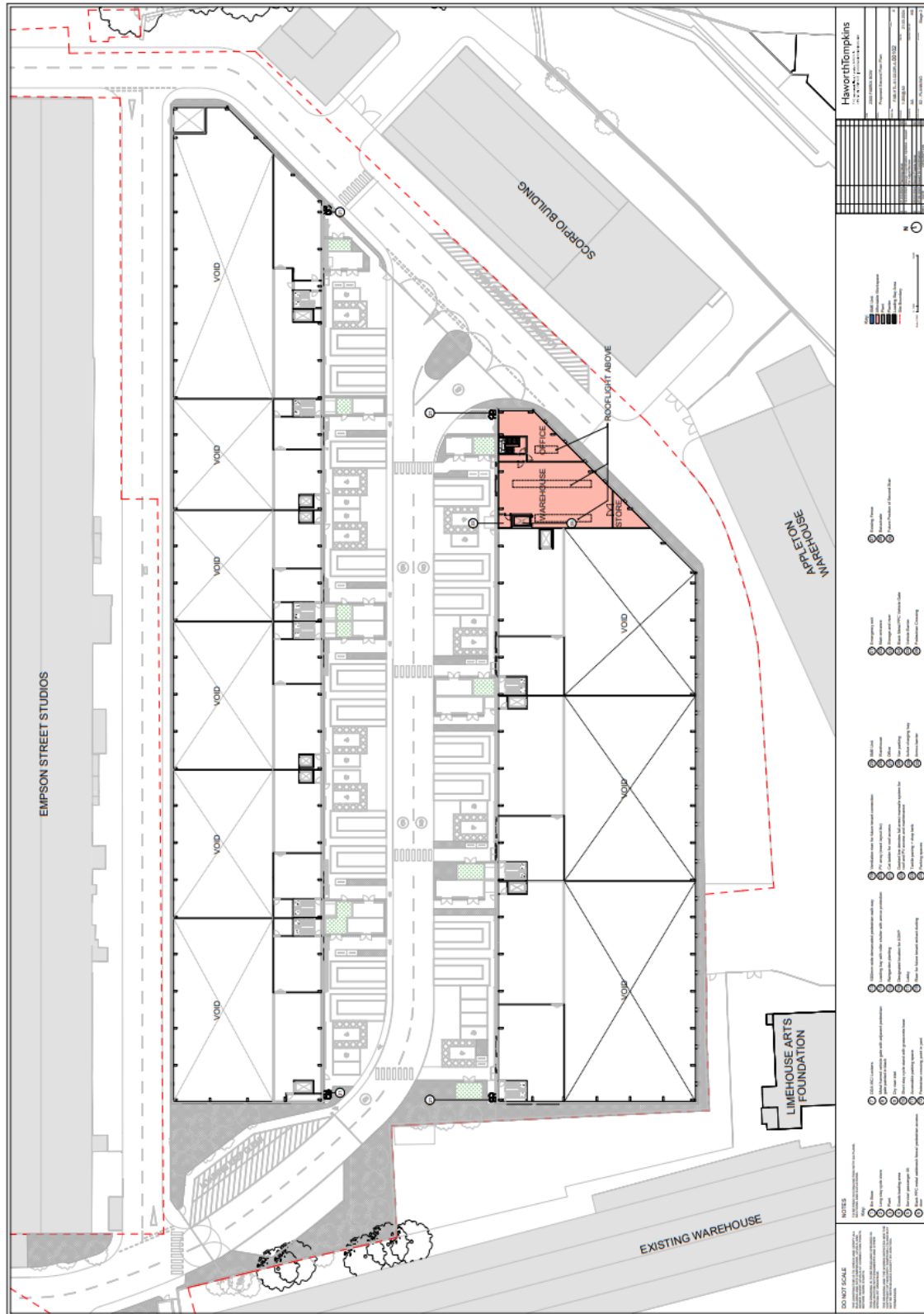


DO NOT SCALE
 This drawing is for information only and should not be used for construction purposes. All dimensions and details should be taken from the approved contract documents. The contractor is responsible for ensuring that the construction complies with all applicable building codes and regulations. The design is subject to change without notice.

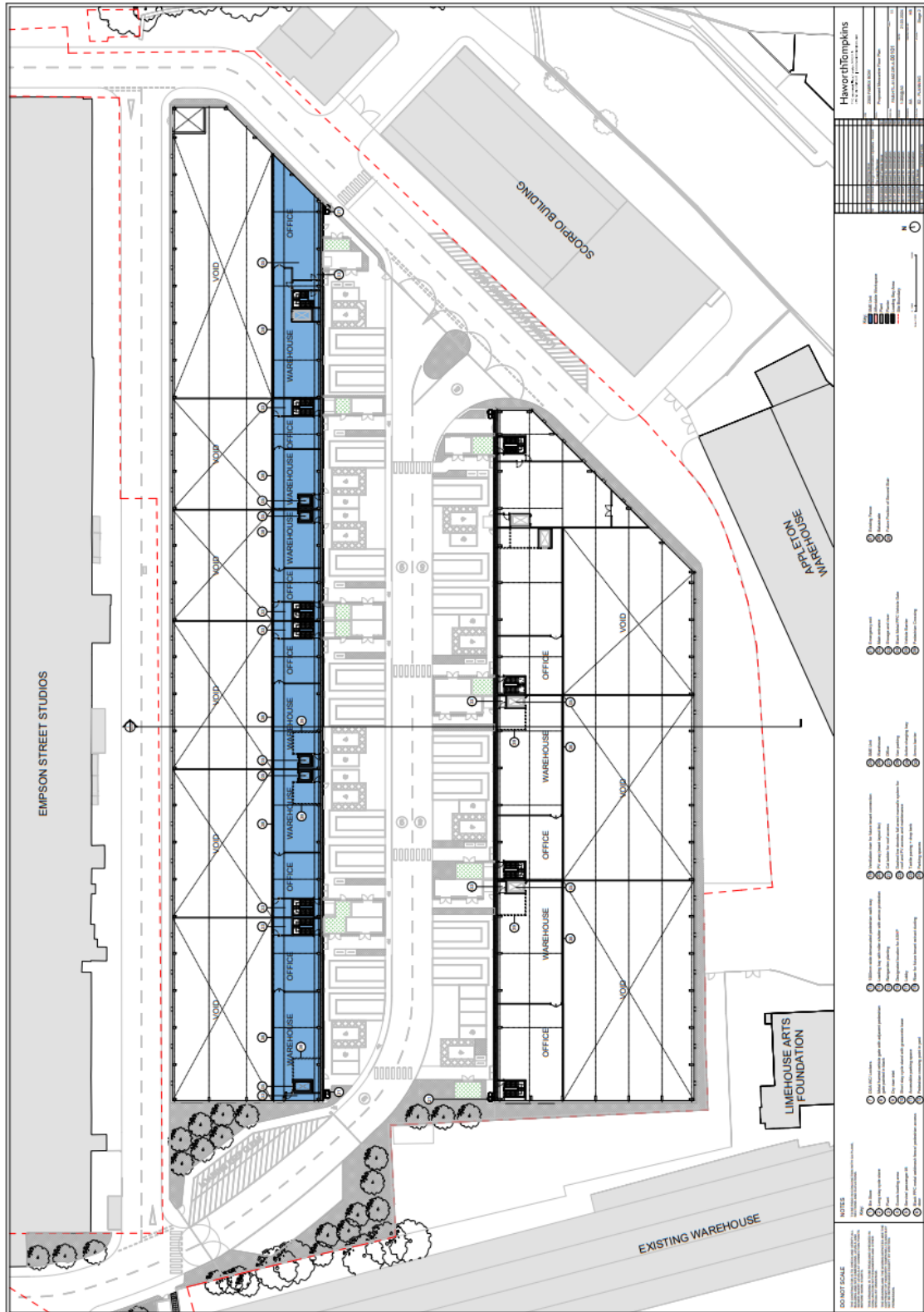
NOTES

1. All dimensions are in millimeters unless otherwise stated.
 2. The contractor is responsible for ensuring that the construction complies with all applicable building codes and regulations.

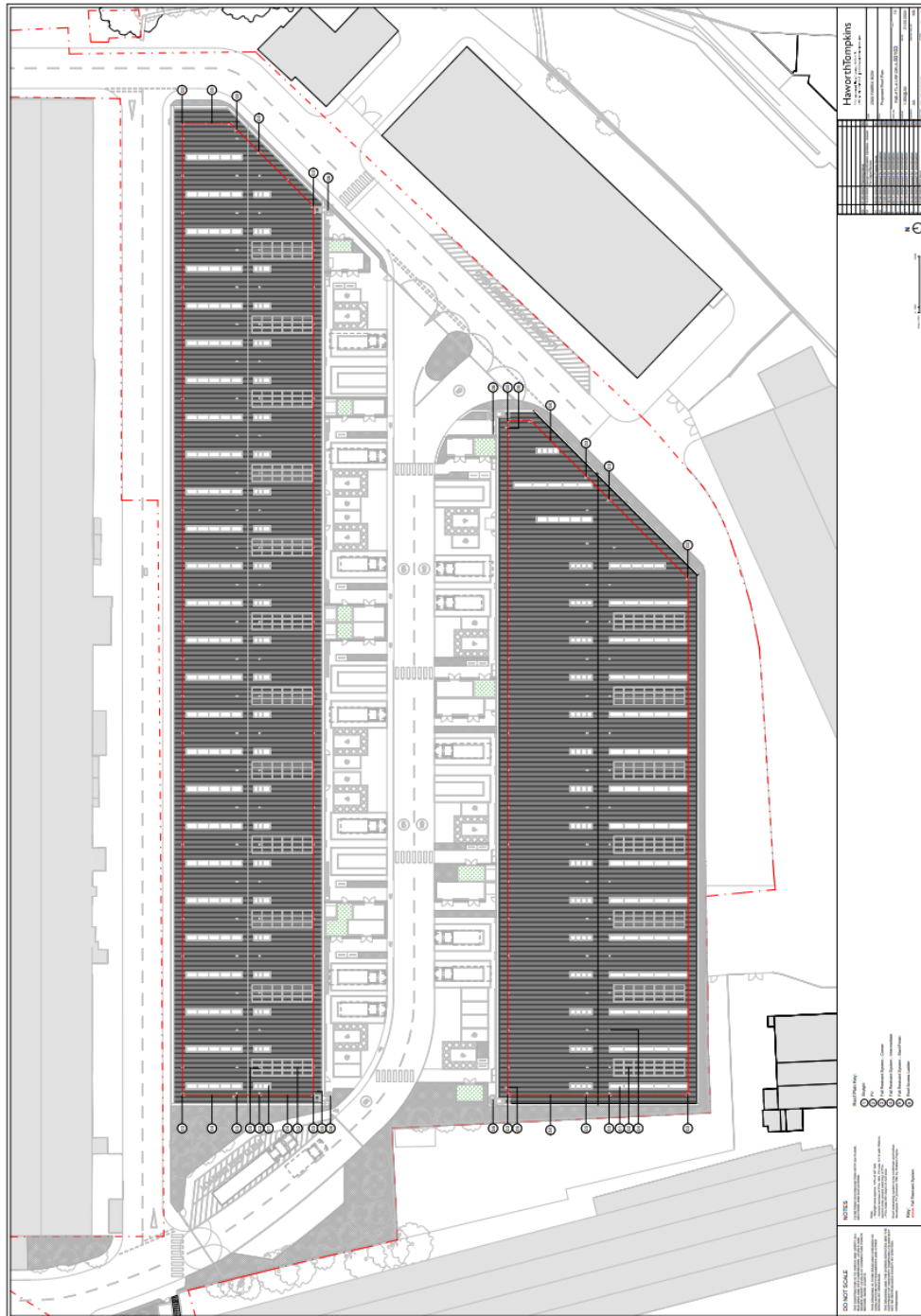
Appendix 1.11 – Proposed Second Floor Plan



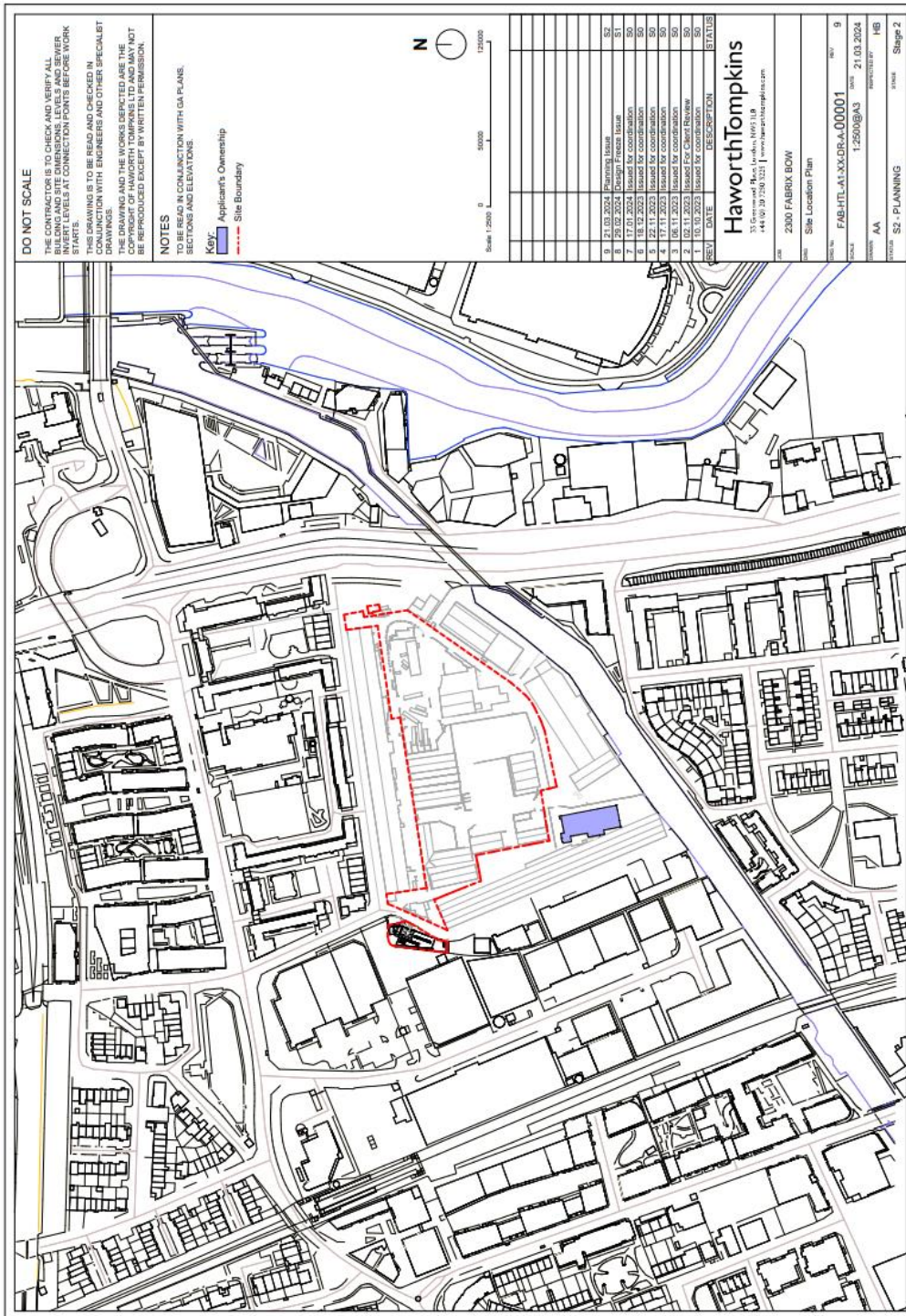
Appendix 1.12 – Proposed Mezzanine Floor Plan



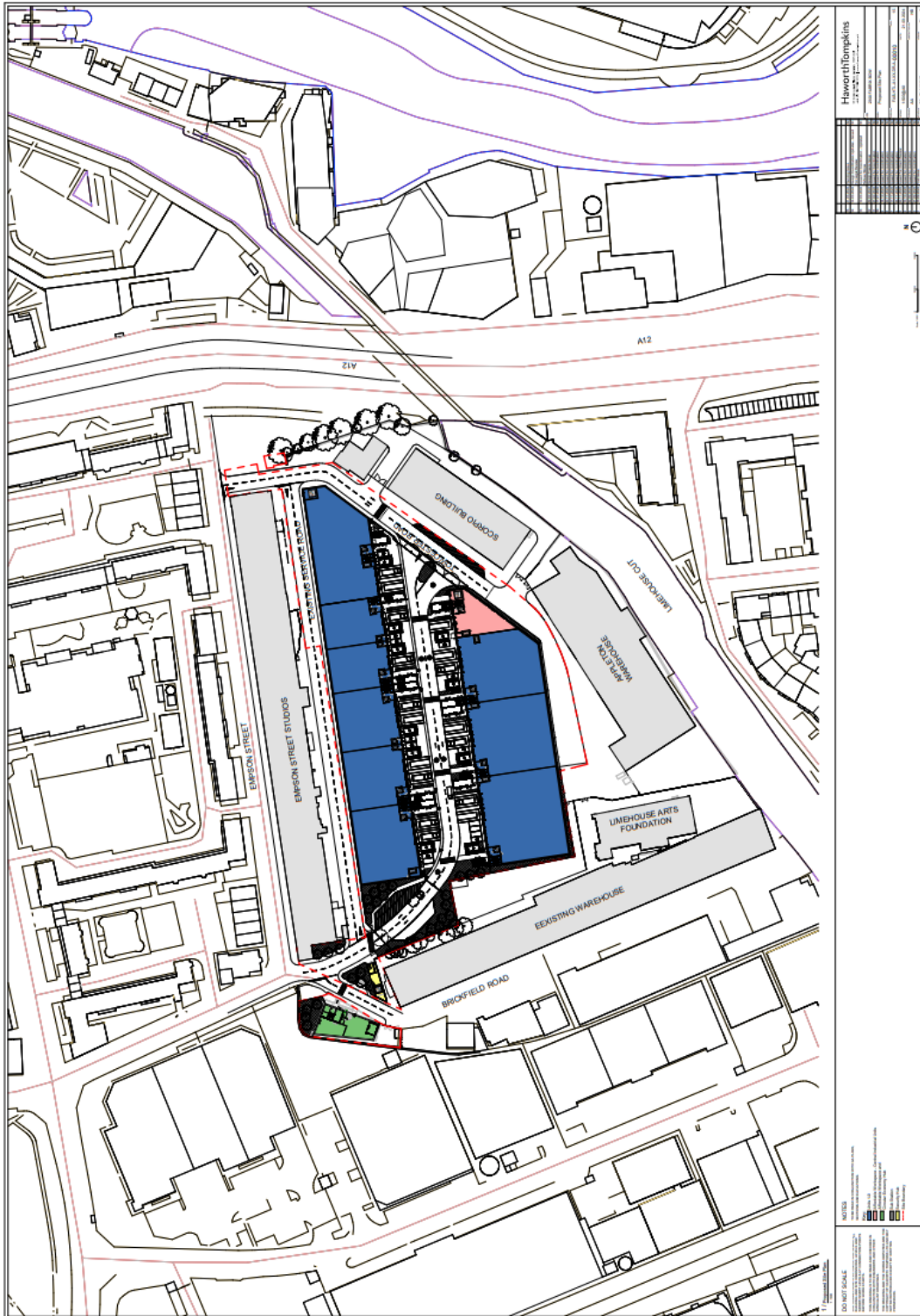
Appendix 1.13 – Proposed Roof Plan



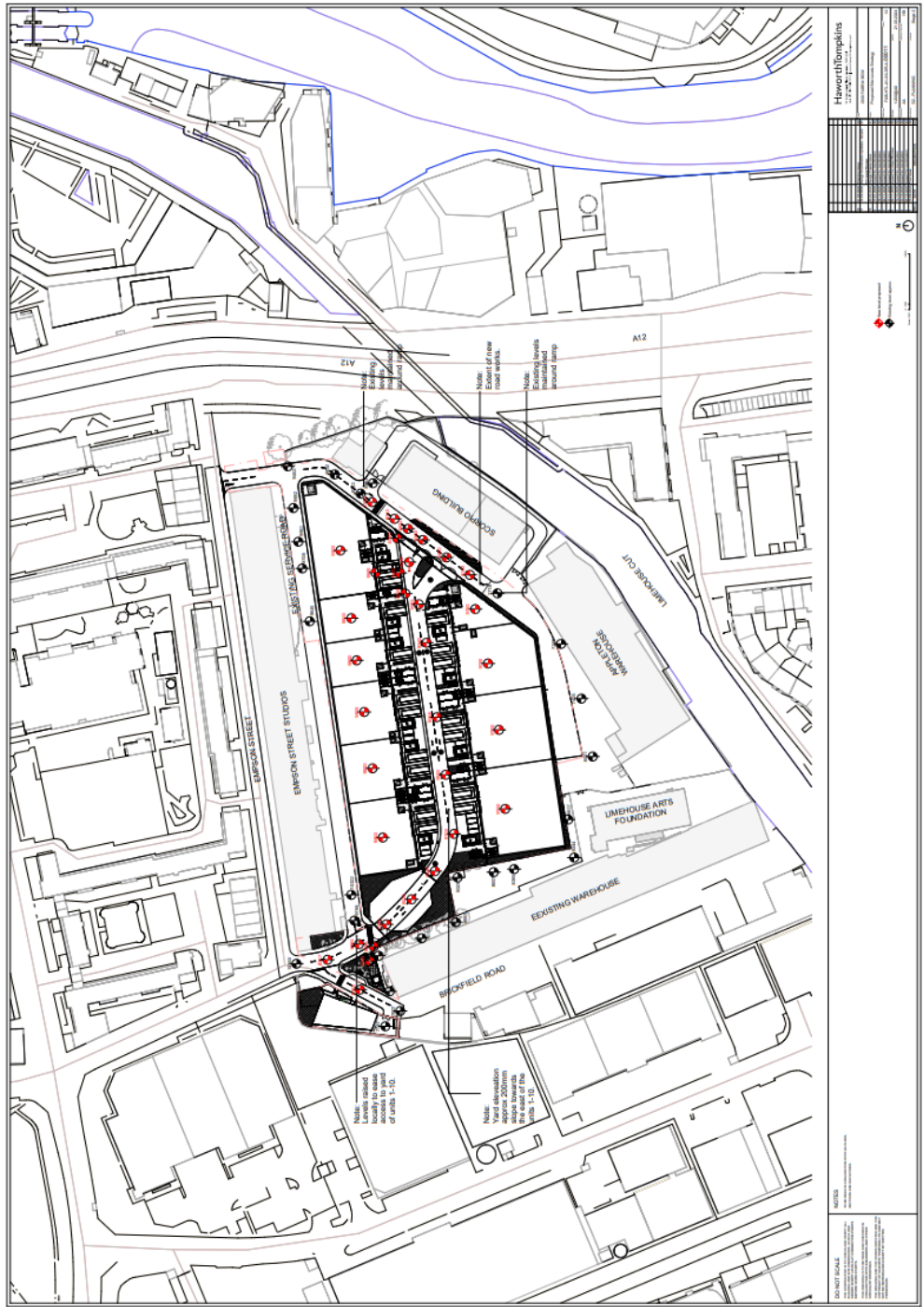
Appendix 1.14 – Site Location Plan



Appendix 1.15 – Proposed Site Plan



Appendix 1.16 – Proposed Site Levels Strategy



Appendix 1.18 – Detailed Plan Towcester Road



LANDSIDE PROJECTS

PROJECT NO: 2023-10-02 Planning Phase

DATE: 2023-10-02

SCALE: 1:100 @ A1

STATUS: Planning

DATE: 2023-10-02

CLIENT: RHI

DESIGNER: NS

PROJECT TITLE: **BBB-IP**

LOCATION: **Empson Street, Bromley by Bow**

CLIENT: **FABRIX**

TITLE: **Detailed Plan - Towcester Road**

SCALE: **1:100 @ A1**

STATUS: **Planning**

DATE: **2023-10-02**

CLIENT: **RHI**

DESIGNER: **NS**

REFERENCE: **530-LF-GA-202** ref: P1

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(1) Do not scale from this drawing. Use other dimensions.