

Committee: Development Committee	Date: 13 th January 2016	Classification: Unrestricted
Report of: Director of Development and Renewal		Title: Applications for Planning Permission
Case Officer: Brett McAllister		Ref No: PA/15/02164 Ward: Shadwell

1.0 APPLICATION DETAILS

Location:	27-29 and 33 Caroline Street, London, E1 0JG
Existing Use:	Storage Warehouses (Use Class B8)
Proposal:	Demolition of existing buildings at 27-29 and 33 Caroline Street and erection of two buildings up to 9 storeys in height to provide 56 residential units and landscaped amenity space, cycle parking and associated works.
Drawings:	3330-AL(20)00, 3330-AL(20)01 Rev A, 3330-AL(20)02 Rev A, 3330-AL(20)03 Rev A, 3330-AL(20)04 Rev A, 3330-AL(20)05 Rev A, 3330-AL(20)06 Rev A, 3330-AL(20)07 Rev A, 3330-AL(20)08 Rev A, 3330-AL(20)10 Rev A, 3330-AL(20)11 Rev A, 3330-AL(20)12 Rev A, 3330-AL(20)20 Rev A, 3330-AL(20)21 Rev A, 3330-AL(20)22 Rev A, 3330-AL(20)23 Rev A, 3330-AL(20)24 Rev A, 3330-AL(20)25 Rev A, 3330-AL(20)26 Rev A, 3330-AL(20)27 Rev A, 3330-AL(20)28, 3330-AL(20)29, 3330-AL(20)30, 3330-AL(20)100, 3330-AL(20)101, 3330-AL(20)102, 3330-AL(20)103, 3330-AL(20)110 Rev B, 3330-AL(20)111 Rev B, 3330-AL(20)112 Rev B, 3330-AL(20)113 Rev B, 3330-AL(20)114 Rev B, 3330-AL(20)115 Rev B, 3330-AL(20)116 Rev B, 3330-AL(20)117 Rev B, 3330-AL(20)200 Rev B, 3330-AL(20)201 Rev B, 3330-AL(20)202 Rev B, 3330-AL(20)203 Rev B, 3330-AL(20)204 Rev B, 3330-AL(20)205 Rev B, 3330-AL(20)40 Rev A, 3330-AL(20)41 Rev A, 3330-AL(20)42 Rev A, 3330-AL(20)43 Rev A, 3330-AL(20)44 Rev A, 3330-AL(20)45 Rev A, 3330-AL(20)46 Rev A, 3330-AL(20)47 Rev A, 3330-AL(20)48 Rev A, 3330-AL(20)49 Rev A, 3330-AL(20)50 Rev A, 3330-AL(20)51, 3330-AL(20)52, 3330-AL(20)53.
Documents:	Design and Access Statement by StockWool ref. 3330 (July 2015)

Daylight, Sunlight and Shadow Assessment by NLP ref. 14385/IR/BK (July 2015)
 Transport Statement by Glanville ref. TR8150307/GT/005 Issue 2: 17 July 2015)
 Planning Statement by NLP ref. 14385/IR/BK/KM (July 2015)
 Acoustic Assessment by Airo ref. SRB6901 (16 July 2015)
 Air Quality Assessment by PBA ref. 33786/3001 (July 2015)
 Desk Based Archaeological Assessment by CGMS ref. SD/SH/19841 (July 2015)
 Employment Statement by NLP ref. 14385/IR/BK/KM (July 2015)
 Energy & Sustainability Assessment by Bluecroft Caroline Rev. A (July 2015)
 Energy & Sustainability Addendum by Bluecroft Caroline (October 2015)
 Landscape & Public Realm Strategy by Spacehub (July 2015)
 Phase 1 Desk Top Study Report: Site 1 by Herts and Essex Site Investigations (July 2015)
 Phase 1 Desk Top Study Report: Site 2 by Herts and Essex Site Investigations (July 2015)
 Statement of Community Involvement by NLP ref. 14385/IR/BK/KM (July 2015)

Applicant: Bluecroft Caroline Ltd.
Ownership: Bluecroft Caroline Ltd.
Historic Building: Adjacent to Grade II Listed 490 Commercial Road (Troxy Hall)
Conservation Area: Adjacent to York Square Conservation Area

2.0 EXECUTIVE SUMMARY

- 2.1 The report considers an application for demolition of two warehouses and redevelopment of the site to provide a residential development of 56 new dwellings arranged over two blocks of between five to nine storeys in height.
- 2.2 Officers have considered the particular circumstances of this application against the provisions of the Local Plan and other material considerations as set out in this report, and recommend approval of planning permission.
- 2.3 The development would result in the provision of 28% affordable housing by habitable room (9 Affordable rented units and 5 Intermediate units).
- 2.4 The residential quality of the scheme would be high. Out of the 9 affordable rented units 44.5% would be of a size suitable for families (4 units). All of the proposed affordable units would meet or exceed the floorspace and layout standards with family sized units being more spacious. All of the dwellings would meet Lifetime Homes standards and 10% would be provided as wheelchair accessible.

- 2.5 The report explains that the proposals would be acceptable in terms of height, scale, design and appearance and would deliver good quality homes in a sustainable location. The proposed flats, other than the studio and ground floor duplex units, would be served by private balconies and terraces that meet or exceed minimum London Plan SPG space requirements.
- 2.6 The amenity impact of the development would be acceptable. Officers consider that the design of the development, massing of the site minimise any adverse amenity implications, in terms of light, privacy, noise and traffic impacts.
- 2.7 The proposal would be acceptable with regard to highway and transportation matters including parking, access and servicing.
- 2.8 The scheme would meet the full obligation of financial contribution.

3.0 RECOMMENDATION

- 3.1 That the Committee resolve to GRANT planning permission subject to:
- 3.3 The prior completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended), to secure the following planning obligations:
- 3.4 Financial Obligations:
 - a) A contribution of **£173,000** towards Affordable Housing
 - b) A contribution of **£20,827** towards employment, skills, training and enterprise initiatives.
 - c) A contribution of **£17,000** towards Carbon Off-Setting.
 - d) **£3,000** towards monitoring fee (£500 per s106 HoT's)

Total £213, 827

- 3.5 Non-financial Obligations:
 - a) Affordable housing 28% by habitable room (14 units)
 - 66% Affordable Rent at Borough affordable rental levels (9 units)
 - 34% Intermediate Shared Ownership (5 units)
 - b) Access to employment
 - 20% Local Procurement
 - 20% Local Labour in Construction
 - c) Car free agreement
 - d) Any other planning obligation(s) considered necessary by the Corporate Director Development & Renewal
- 3.4 That the Corporate Director, Development & Renewal is delegated authority to negotiate and approve the legal agreement indicated above.
- 3.5 That the Corporate Director Development & Renewal is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

3.6 Conditions:

1. Three year time limit
2. Compliance with approved plans and documents
3. Samples and details of all facing materials
4. Details of hard and soft landscaping, including boundary treatment and lighting
5. Details of play equipment
6. Details of green roof
7. Details of drainage and mitigation of surface water run-off
8. Details of all Secure by Design measures
9. Hours of construction and demolition
10. Demolition and Construction Management/Logistics Plan
11. Delivery and Servicing Management Plan
12. Travel Plan
13. Contamination
14. Compliance with Energy Statement
15. Details of cycle parking
16. Details of noise and Vibration levels post completion testing
17. Details of piling, all below ground works and mitigation of ground borne noise
18. Ground borne noise post-completion testing as requested
19. Scheme of highway improvement works as requested by LBTH Highways requiring one disabled parking space and relocation of an existing bay

3.7 Any other conditions considered necessary by the Corporate Director Development & Renewal.

3.8 Informatives:

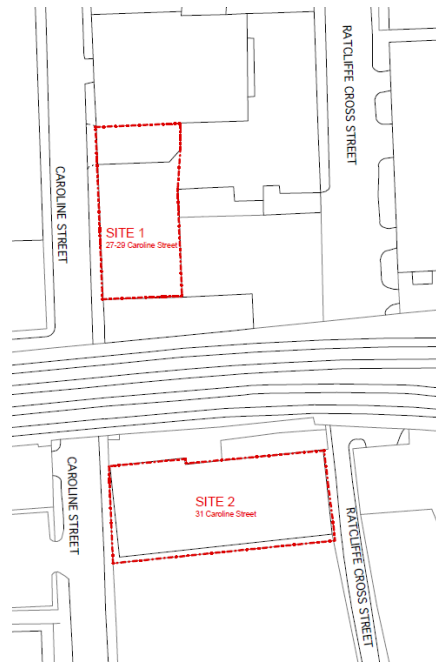
1. Subject to a S106 agreement
2. Thames Water standard informative
3. Building Control
4. Network Rail
5. CIL

3.9 Any other informatives considered necessary by the Corporate Director Development & Renewal.

4.0 PROPOSAL AND LOCATION DETAILS

Site and Surroundings

- 4.1. The application consists of two sites, separated by the Docklands Light Rail, hereafter referred to as "Site 1" and "Site 2". Each site consists of a vacant warehouse which most recently operated as lock-up archival storage facilities. They are utilitarian in appearance and are equivalent to around three storeys in height.
- 4.2. The two sites are separated by a railway viaduct serving national rail and DLR stations. Site 1 is north of the railway viaduct and a railway servicing area. It is adjacent to Caroline Street which defines its western boundary. Site 2 is south of the railway viaduct, is also bounded on the western side by Caroline Street but extends to Radcliff Cross Street on its eastern side.
- 4.3. The following location plan shows the proximity of both sites.



- 4.4. An attractive three-storey Victorian warehouse is located directly north of Site 1 on Caroline Street and this warehouse forms the southern boundary of the York Square Conservation Area. Immediately to the east of this site there is a non-descript four-storey warehouse and an empty area of land that has recently been granted planning permission for a seven and eight-storey residential building. To the west of Site 1 is the functional western elevation of the Grade II listed Troxy towards the rear of this building is a palette storage site on the corner between Caroline Street and Pitsea Place. The Troxy is also located within the York Square Conservation Area.
- 4.5. Site 2 is just south of the railway viaduct between Caroline Street and Ratcliffe Cross Street. Abutting the site to the south is a four storey residential development called Reservoir Studios. To the east of this site on the other side of Radcliffe Cross Street is a large empty site that has outline permission for a seven and eight-storey mixed-use scheme. To the west of the site there are two car-parks, one next to the arches underneath the railway viaduct and one serving the two residential blocks of Edward Mann Close.
- 4.6. The surrounding area is mixed in character. Having originally formed a part of an area of commercial and industrial uses the character has changed over recent years with many of the older industrial sites being re-developed for housing. Much of the housing takes the form of multi-storey flats which have become a feature of the streetscape in this part of the Borough.
- 4.7. The site benefits from excellent access to public transport with a Public Transport Accessibility Level (PTAL) of 5, the site is within close proximity to Limehouse Docklands Light Railway (DLR) and National rail. Bus no. 15, 115, 135 and D3 all located on Commercial Road.

Planning History and Project Background

- 4.8. There is no history at the application site but there are a number of recent applications in the surrounding area, which help inform the emerging context of the site.

1-9 Ratcliffe Cross Street - PA/14/01671

- 4.9. Demolition of existing workshop at 1-9 Ratcliffe Cross Street and redevelopment to provide part 7 and part 8 storey residential comprising of 56 flats (30 x 1 bed, 13 x 2 bed, 13 x 3 bed) with associated ground floor car park and cycle parking. Development of land to the south of 8-12 Ratcliffe Cross Street to provide an 8 storey residential comprising of 22 flats (8 x1 bed, 7 x 2 bed, 7 x 3 bed) with associated undercroft car and cycle parking and protected roof top child play space.
Granted: 30.03.2015

6 Boulcott Street – PA/13/00697

- 4.10. Demolition of existing building and redevelopment to reprovide an 8 storey building with a social club (Use Class D2) on the ground and 1st floor with residential (Use Class C3) above, comprising 25 units (9 x 1 bed, 13 x 2 bed and 3 x 3 bed).
Granted: 26.11.2014

Site at North East Junction of Cable Street and Ratcliffe Cross Street – PA/11/01818

- 4.11. Outline application for a mixed use development containing 57 apartments and 970sqm of commercial space for A1, B1 / D1 use as a part 7, part 8 storey development.
Granted: 05.07.2013

2-4 Boulcot Street – PA/09/00010

- 4.12. Demolition of existing building and erection of a 5 storey building with commercial at ground floor level and 8 flats above (1 x studio, 4 x 1 bed, 2 x 2 bed, 1 x 3 bed).
Granted: 26.02.2009

Proposal

- 4.13. Full planning permission is sought for demolition of existing buildings at 27-29 and 33 Caroline Street and erection of two buildings up to 9 storeys in height to provide 56 residential units and landscaped amenity space, cycle parking and associated works.
- 4.14. Site 1 would be comprised of 28 units (6 Studios, 10 x 1 bed, 10 x 2 bed and 2 x 3 bed) with associated cycle parking and refuse facilities. Site 2 would also be comprised of 28 units consisting of 6 x 1 bed, 17 x 2 bed and 5 x 3 bed. Site 1 is to be 100% private and Site 2 is to consist of 14 affordable units and 14 Private units.
- 4.15. Site 1 will rise to a height of nine principal storeys adjacent to the railway, stepping down to part eight and part six storeys. Site 2 will rise to a height of eight storeys at the western end of the site, stepping down to seven storeys on the eastern end of the site. The scheme will be based on a simple palette of high quality materials which reference the area's industrial heritage.
- 4.16. The proposed development would be car-free. A permit free agreement will be entered into with Tower Hamlets to restrict future residents from access to parking permits. One disabled parking space is proposed on Caroline Street.

5.0 POLICY FRAMEWORK

5.1 For details of the status of relevant policies see the front sheet for “Planning Applications for Determination” agenda items. The following policies are relevant to the application:

5.2 Government Planning Policy

National Planning Policy Framework 2012

5.3 London Plan FALP 2015

- 2.9 - Inner London
- 2.14 - Areas for regeneration
- 2.18 - Green infrastructure: the network of open and green spaces
- 3.1 - Ensuring equal life chances for all
- 3.2 - Improving health and addressing health inequalities
- 3.3 - Increasing housing supply
- 3.4 - Optimising housing potential
- 3.5 - Quality and design of housing developments
- 3.6 - Children and young people’s play and informal recreation facilities
- 3.7 - Large residential developments
- 3.8 - Housing choice
- 3.9 - Mixed and balanced communities
- 3.10 - Definition of affordable housing
- 3.11 - Affordable housing targets
- 3.13 - Affordable housing thresholds
- 4.12 - Improving opportunities for all
- 5.1 - Climate change mitigation
- 5.2 - Minimising carbon dioxide emissions
- 5.3 - Sustainable design and construction
- 5.5 - Decentralised energy networks
- 5.6 - Decentralised energy in development proposals
- 5.7 - Renewable energy
- 5.8 - Innovative energy technologies
- 5.9 - Overheating and cooling
- 5.10 - Urban greening
- 5.11 - Green roofs and development site environs
- 5.12 - Flood risk management
- 5.13 - Sustainable drainage
- 5.14 - Water quality and wastewater infrastructure
- 5.15 - Water use and supplies
- 5.18 - Construction, excavation and demolition waste
- 5.21 - Contaminated land
- 6.3 - Assessing effects of development on transport capacity
- 6.9 - Cycling
- 6.10 - Walking
- 6.13 - Parking
- 7.1 - Building London’s neighbourhoods and communities
- 7.2 - An inclusive environment
- 7.3 - Designing out crime
- 7.4 - Local character
- 7.5 - Public realm
- 7.6 - Architecture

- 7.7 - Location and design of tall and large buildings
- 7.8 - Heritage assets and archaeology
- 7.13 - Safety, security and resilience to emergency
- 7.14 - Improving air quality
- 7.15 - Reducing noise and enhancing soundscapes
- 7.18 - Protecting local open space and addressing local deficiency
- 7.19 - Biodiversity and access to nature
- 7.21 - Trees and woodland
- 8.2 - Planning obligations

5.4 **Core Strategy 2010**

- SP02 - Urban living for everyone
- SP03 - Creating healthy and liveable neighbourhoods
- SP04 - Creating a green and blue grid
- SP05 - Dealing with waste
- SP09 - Creating attractive and safe streets and spaces
- SP10 - Creating distinct and durable places
- SP11 - Working towards a zero-carbon borough
- SP12 - Delivering placemaking (Bow)
- SP13 - Planning Obligations

5.5 **Managing Development Document 2013**

- DM0 - Delivering Sustainable Development
- DM1 - Development within the town centre hierarchy
- DM3 - Delivering homes
- DM4 - Housing standards and amenity space
- DM9 - Improving air quality
- DM10 - Delivering open space
- DM11 - Living buildings and biodiversity
- DM13 - Sustainable drainage
- DM14 - Managing Waste
- DM20 - Supporting a sustainable transport network
- DM21 - Sustainable transportation of freight
- DM22 - Parking
- DM23 - Streets and the public realm
- DM24 - Place sensitive design
- DM25 - Amenity
- DM27 - Heritage and the historic environments
- DM29 - Achieving a zero-carbon borough and addressing climate change
- DM30 - Contaminated Land

5.6 **Supplementary Planning Guidance/Documents and Other Documents**

Mayor of London

- Shaping Neighbourhoods: Play and Informal Recreation (2012)
- Shaping Neighbourhoods: Character and Context - Draft (2013)
- Sustainable Design and Construction - Draft (2013)
- Accessible London: Achieving an Inclusive Environment (2004)
- All London Green Grid (2012)
- Housing (2012)
- London Planning Statement - Draft (2012)

Other

- Revised Draft Planning Obligations SPD 2015 (consultation draft)

5.7 **Tower Hamlets Community Plan objectives**

- A Great Place to Live
- A Prosperous Community
- A Safe and Supportive Community
- A Healthy Community

6.0 **CONSULTATION RESPONSE**

6.1 The views of the Directorate of Development & Renewal are expressed in the MATERIAL PLANNING CONSIDERATIONS section below. The summary of consultation responses received is provided below.

6.2 The following were consulted regarding the application:

External Consultees

Transport for London

6.3 TfL have the following comments:

- TfL welcomes the 'car free' principle proposed by the applicant. TfL also acknowledges that in this instance it is deemed unsafe to provide any off site Disabled Access parking.
- The proposed quantum of cycle parking at 90 spaces is deemed acceptable in line with the London Plan (2015). TfL also considers the allocation of cycle parking to be suitable in line the London Cycle Design Standards.
- TfL requires that the applicant submit a Residential Travel Plan Statement to be secured by S106.
- TfL also requires the applicant to provide a Construction Statement in order to ensure that no safety or functional implications occur.

6.4 *[Officer Comment: These matters are discussed in the material planning considerations section of the report. Conditions are recommended securing a travel plan, cycle parking and constructions management plans]*

Network Rail (NR)

6.5 As the site is located adjacent to Network Rail Infrastructure, details comments have been received from Network Rail, outlining their requirements. Theses have been passed onto the developer for their information.

6.6 *[Officer Comment: A number of items from NR's comments are considered necessary to be conditioned these include: Details relating to Piling, Fencing, Landscaping and Lighting]*

Thames Water (TW)

6.7 TW do not have any objection to the above planning application in relation to sewage impact or Water Infrastructure capacity.

6.8 TW recommend a condition restricting impact piling.

6.9 *[Officer comment: The requested condition and an additional informative are recommended to this consent]*

Docklands Light Railway (DLR)

6.10 Made no comments.

Historic England

6.11 This application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Historic England – Archaeology

6.12 Recommend No Archaeological Requirement.

Environmental Health – Contamination

6.13 Development of the site shall not begin until a scheme has been submitted to the local planning authority and written approval has been granted for the scheme. This would be secured by condition. The scheme will identify the extent of the contamination and the measures to be taken to avoid risk to the public, buildings and environment when the site is developed.

6.14 *[Officer comment: The requested condition will be secured]*

Environmental Health - Noise and Vibration

6.15 No objections raised subject to a conditioned for post completion assessment for Noise and Vibration, before residential occupation so as to ensure that future residents are protected from Noise/Vibration disturbance or nuisance.

6.16 *[Officer comment: These matters are discussed in the material planning considerations section of this report. Suggested condition has been included]*

Environmental Health - Housing

6.17 No comments

Transportation and Highways

6.18 The following is a summary of the representations received from the Councils Transportation and Highways department.

- The proposed location for the refuse store (for site 1) located opposite car parking bays would block the road during refuse collection and therefore be unacceptable.
- Refuse collection would not be able to be conducted from Ratcliffe Cross Street.
- Highways welcome the proposal to have car and permit free development.
- The proposal for 90 cycle parking meets the quantity required in the London Plan.
- LBTH's preferred option for stands is the Sheffield stand or a similar hooped design which allows bicycles to be rolled into a horizontal ground level position effortlessly while at the same time providing increased security.

- A legal agreement under Section 278 of the Highways Act 1980 will be necessary and this will enable extensive highway improvement works above works.
- Due to the location of the development highways require the applicant to submit a Construction Management Plan (CMP) to the local planning authority
- Highways require that a condition is attached to any permission that no development should start until Highways has approved in writing the scheme of highway improvements necessary to serve this development

6.19 *[Officer comments: The application would be conditioned so that the parking bays in front of the refuse store of Site 1 are to be moved before commencement of works to ensure the refuse store can be serviced. Servicing arrangements for Site 2 have been amended to ensure refuse collection can take place from Caroline Street only. The two-tier cycle parking is considered acceptable considering the constrained nature of the site and the fact that half of the cycle parking would be easily accessible at ground floor. The suggested conditions relating to CMP and Highway would be secured]*

Waste

- 6.20 The following is a summary of comments received.
- Refuse collection cannot be conducted from Ratcliffe Cross Street.
 - Ideally the proposal would meet the waste standards that are set to come in.
 - The refuse stores should be large enough so that each individual bin can be manoeuvred without having to move another bin.
 - The parking spaces in front of the refuse store at Site 1 would need to be moved in order for this to be acceptable.
- 6.21 *[Officer comment: The application would be conditioned so that the parking bays in front of the refuse store of Site 1 are to be moved before commencement of works. Servicing arrangements for Site 2 were altered so that refuse would be collected from Caroline Street only]*

Crime Prevention Officer

- 6.22 The following issues have been identified:
- Officers should seek to ensure all access/egress points to external Communal doors (such as Caroline St) should have recessed spaces between the door and street of no greater than 600mm.
 - There should be a second security door with access/control placed between the external access doors and lifts/stairs.
 - Balcony details needs to be considered carefully to prevent these becoming climbing aids.
 - A condition is recommended for the scheme to achieve Secured by Design (SBD).
- 6.23 *[OFFICER COMMENT: These matters are discussed in the material planning considerations section of this report. A condition is recommended to achieve the SBD]*

Surface Water Run-Off

- 6.24 A detailed surface water drainage scheme will need to be submitted to LPA prior to works commencing.

7.0 LOCAL REPRESENTATION

Statutory Consultees

7.1 A total of 151 letters were sent to occupiers of neighbouring properties, a site notice was displayed outside the application site, and a press advert was published in the East End Life Newspaper.

7.2 The number of representations received in response to notification and publicity of the application is as follows:

No of individual responses: Objecting: 1 Supporting: 0

No of petitions received: 0

7.3 The following issues were raised in representations that are material to the determination of the application, and they are addressed in the next section of this report:

- New residents will experience noise from the Troxy Hall.
- Increased parking pressure
- Potential problems caused for loading at the Troxy
- Road closures and access issues during construction
- Light industrial uses should be retained.

7.5 [Officer Comment: The above issues are fully discussed within the highway section of this report].

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Committee are requested to consider are:

- Land Use
- Housing
- Design
- Amenity
- Transport, Access and Servicing
- Sustainability and Environmental Considerations
- Planning Obligations

Land Use

8.2 The National Planning Policy Framework sets out the Government's land use planning and sustainable development objectives. The framework identifies a holistic approach to sustainable development as a core purpose of the planning system and requires the planning system to perform three distinct but interrelated roles:

- an economic role – contributing to the economy through ensuring sufficient supply of land and infrastructure;
- a social role – supporting local communities by providing a high quality built environment, adequate housing and local services; and

- an environmental role – protecting and enhancing the natural, built and historic environment.
- 8.3 These economic, social and environmental goals should be sought jointly and simultaneously.
- 8.4 Paragraph 9 of the NPPF highlights that the pursuit of sustainable development includes widening the choice of high quality homes, improving the conditions in which people live and take leisure, and replacing poor design with better design. Furthermore, paragraph 17 states that it is a core planning principle to efficiently reuse land that has previously been developed and to drive and support sustainable economic development through meeting the housing needs of an area.
- 8.5 Policy 2.9 of the London Plan identifies the unique challenges and potential of inner London and specifies that boroughs should work to sustain its economic and demographic growth while addressing concentrations of deprivation and improving the quality of life and health for those living there.
- 8.6 The application site carries no site-specific policy designations but is located within an ‘edge of centre’ area in relation to the Limehouse Neighbourhood Town Centre, located approximately 40m to the north of Site 1.

Principle of residential use

- 8.7 Delivering new housing is a key priority both locally and nationally. Through policy 3.3, the London Plan (FALP 2015) seeks to alleviate the current and projected housing shortage within London through provision of an annual average of 42,000 net new homes. The minimum ten year target for Tower Hamlets, for years 2015-2025 is set at 39,314 with an annual monitoring target of 3,931. The need to address the pressing demand for new residential accommodation is addressed by the Council’s strategic objectives SO7 and SO8 and policy SP02 of the Core Strategy. These policies and objectives place particular focus on delivering more affordable homes throughout the borough.
- 8.8 Objective S05 and policy SP01 identify edge of town centre locations, such as the application site, as suitable for mixed use development with the proportion of residential accommodation increasing away from designated town centres. Additionally, the place making policy SP12 envisages Limehouse as a suitable place for families.
- 8.9 Given the above and the increasingly residential character of surrounding area around the site, the principle of intensification of housing use on this brownfield site is strongly supported in policy terms.

Loss of Storage Warehouse (Use Class B8)

- 8.10 Policy DM15 states that employment uses should only be lost if they are not viable or they are unsuitable for continued use. Evidence of a marketing exercise for approximately 12 months is usually required to demonstrate that there is no demand for the existing employment use before a loss will be accepted. This has not been provided. In this case however, in light of the intense housing pressure outlined in the above section, the loss of these vacant storage warehouses is considered acceptable especially considering the low levels of employment they would sustain, when balanced against the need to provide new housing.

Housing

- 8.11 The NPPF identifies as a core planning principle the need to encourage the effective use of land through the reuse of suitably located previously developed land and buildings. Section 6 of the NPPF states that “housing applications should be considered in the context of the presumption in favour of sustainable development” Local planning authorities should seek to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 8.12 As mentioned in the Land Use section of this report, delivering new housing is a key priority both locally and nationally.

Residential density

- 8.13 Policy 3.4 of the London Plan seeks to optimise the density of development with consideration for local context and public transport capacity. The policy is supported by Table 3A.2 which links residential density to public transport accessibility and urban character. Policy SP02 of the Core Strategy while reiterating the above adds that density levels of housing should correspond to the Council’s town centre hierarchy and that higher densities should be promoted in locations in or close to designated town centres.
- 8.14 The application site measures approximately 0.037 hectares for Site 1 and 0.055 for Site B, the two sites have a PTAL rating of 5. In areas of PTAL 5 within an urban setting, the density matrix 5 associated with policy 3.4 of the London Plan suggests a density of between 200-700 habitable rooms per hectare. The proposed density across both sites would be 1198.4 habitable rooms per hectare.
- 8.15 It should be remembered that density only serves as an indication of the likely impact of development. Typically high density schemes may have an unacceptable impact on the following areas:
- Access to sunlight and daylight;
 - Lack of open space and amenity space;
 - Increased sense of enclosure;
 - Loss of outlook;
 - Increased traffic generation; and
 - Impacts on social and physical infrastructure.

- 8.16 This report will go on to show that the scheme has minimal impacts of overdevelopment within this application; Officers have sought to weigh up its impacts against the benefits of the scheme and in particular the provision of affordable housing.

Affordable housing

- 8.17 In line with section 6 of the NPPF, the London Plan has a number of policies which seek to guide the provision of affordable housing in London. Policy 3.8 seeks provision of a genuine choice of housing, including affordable family housing. Policy 3.9 seeks to encourage mixed and balanced communities with mixed tenures promoted across London and specifies that there should be no segregation of London’s population by tenure. Policy 3.11 identifies that there is a strategic priority for affordable family housing and that boroughs should set their own overall targets

for affordable housing provision over the plan period. Policy 3.13 states that the maximum reasonable amount of affordable housing should be secured.

- 8.18 The LBTH Community Plan identifies the delivery of affordable homes for local people as one of the main priorities in the Borough and Policy SP02 of the Core Strategy 2010 sets a strategic target of 35-50% affordable homes on sites providing 10 new residential units or more (subject to viability).
- 8.19 Policy SP02 requires an overall strategic tenure split for affordable homes from new development as 70% social rent and 30% intermediate.
- 8.20 As detailed in table 1 below, the proposal provides 28% affordable housing provision by habitable room. The proposed units will provide a mixed tenure by habitable room of affordable rent (66%) and shared ownership (34%), which is below but approaching the Council's preferred split.

Unit Types	MARKET		INTERMEDIATE		RENTED		TOTAL	
	Units	Hab Rm	Units	Hab Rm	Units	Hab Rm	Units	Hab Rm
Studio	6	6	0	0	0	0	6	6
1	11	22	1	2	4	8	16	32
2	22	66	4	12	1	3	27	81
3	3	12	0	0	4	16	7	28
4	0	0	0	0	0	0	0	0
	42	106	5	14	9	27	56	147

Table 1: Affordable Housing Provision

- 8.21 The application was submitted with a viability appraisal which was independently assessed on behalf of the Council, the Councils appointed consultants advised that the development in addition to the 28% affordable housing as per the applicants offer, the development would generate a surplus of £173,000.000.
- 8.22 The proposed surplus is insufficient to increase the affordable housing within the scheme, and as such given the affordable housing is below 35% it is recommended to secure the surplus towards affordable housing within the borough.
- 8.23 A total of 14 of the 56 residential units within the proposal have been provided as affordable units, which represents a total on-site provision of 28% based on habitable rooms. The applicant has agreed to a monetary contribution of £173,000 towards affordable housing provision. Officers consider this is the maximum reasonable amount of affordable housing and planning contributions whilst ensuring the scheme is viable.
- 8.24 There are specific constraints associated with the subject site; the site is located off a narrow road with the DLR and national rail lines running along the south of the site. This accordingly has an impact on the level of affordable housing the scheme can deliver, whilst being viable.
- 8.25 The affordable rented accommodation would be let in accordance with the Councils Borough affordable rent level for E1 areas. The intermediate properties are to be provided as shared ownership and would accord with affordability levels of the London Plan. For this postcode currently the rents are 1 bed -£202pw, 2 bed - £212pw and 3 bed - £225pw.

8.26 Site 1 would be provided solely as private units and Site 2 as a combination of private and affordable units. Separate access cores would be provided for affordable and private tenures.

8.27 Overall, the proposal meets policy targets and the overall tenure mix on site would assist in creation of a mixed and balanced community.

Dwelling mix

8.28 In line with section 6 of the National Planning Policy Framework and London Plan policy 3.8, the Council's Core Strategy policy SP02 and policy DM3 of the Managing Development Document require development to provide a mix of unit sizes in accordance with the most up-to-date housing needs assessment. The relevant targets and the breakdown of the proposed accommodation are shown in the table below.

		affordable housing						market housing		
		Affordable rented			intermediate			private sale		
Unit size	Total units	scheme units	scheme %	Core Strategy target %	scheme units	scheme %	Core Strategy target %	scheme units	scheme %	Core Strategy target %
studio	6	0	0	0%	0	0	0%	6	14	0%
1 bed	16	4	44	30%	1	20	25%	11	26	50.00%
2 bed	27	1	11	25%	4	80	50%	22	52	30.00%
3 bed	7	4	44	30%	0	0	25%	3	7	20%
4 bed	0	0	0	15%	0	0		0	0	
5 bed	0	0	0	0%	0	0		0	0	
6 bed	0	0	0		0	0		0	0	
Total	56	9	100%	100%	5	100%	100%	42	100%	100%

8.29 The mix of units deviates from the Councils policy in a number of ways, with the rented tenure underproviding two beds for rent and the intermediate tenure providing 80% (4 of 5 units) as 2 beds and no family units. Overall the provision for family sized units is low, with only 7 x three beds in the entire scheme (13%). The proportion of family units in the rented tenure at 44.5% almost meets the 45% target. Housing colleagues consider that although there is a degree of divergence from the policy targets, having come close to achieving the most important output, which are family sized units for rent, it is considered that the housing mix, on the whole is acceptable on balance.

8.30 Officers note that the shortfall in the proportion of larger intermediate units assists with the viability of the proposal and thus enables for a larger proportion of family sized units to be provided within the affordable housing tenure.

8.31 Overall, in light of the proposed quantity and quality of family housing in the affordable rented tenure, the divergence from the housing mix prescribed by policy is considered to be acceptable on balance.

Standard of residential accommodation

8.32 London Plan policy 3.5, policy SP02 of the Core Strategy and policy DM4 of the Managing Development Document seek to ensure that all new housing is

appropriately sized, high-quality and well-designed. Specific standards are provided by the Mayor of London Housing SPG to ensure that the new units would be “fit for purpose in the long term, comfortable, safe, accessible, environmentally sustainable and spacious enough to accommodate the needs of occupants throughout their lifetime.”

- 8.33 All of the proposed units would meet or exceed the baseline internal floorspace standard. In line with guidance, the detailed floor plans submitted with the application demonstrate that the proposed dwellings would be able to accommodate the furniture, storage, access and activity space requirements. The family sized affordable rent units would be provided with sizeable private amenity space.
- 8.34 All units within the affordable tenure will be dual aspect, 14 of the 42 units within the private tenure will not be dual aspect. These would all be in Site 1 which is relatively constrained. All of these units are either south, west or east facing and three are duplex flats.
- 8.35 A number of units fronting Radcliffe Cross Street would not benefit from 18m separation distances. However, given Radcliffe Cross Street is a relatively narrow street and this is traditional street relationship the distance is considered acceptable. Overall, it is considered that all of the proposed units would benefit from adequate privacy, and would not be subject to undue overlooking broadly in compliance with the requirements of policy DM25.
- 8.36 The applicant has submitted a Daylight & Sunlight report addressing daylighting and sunlighting to the proposed units. The report concludes that 82% of the proposed rooms would meet the average daylight factor (ADF) requirements of the British Standard. This is considered a good level of compliance for an urban development project of this scale and character. Many of the rooms that would receive light below the guide levels are those below balconies and it is considered that the inclusion of the balconies outweigh this impact. The report concludes that all of the proposed units would receive adequate sunlighting with the balconies again causing lower than guide levels of sunlight penetration.
- 8.37 Overall, it is considered that the proposal would meet and exceed the relevant qualitative and quantitative design standards and would represent an exemplary standard of living accommodation and amenity to the future occupiers of the scheme.

Wheelchair Accessible Housing and Lifetime Homes Standards

- 8.38 Policy 3.8 of the London Plan and Policy SP02 of the Core Strategy require that all new housing is built to Lifetime Homes Standards and that 10% is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 8.39 Six wheelchair accessible homes are proposed which amounts to just over 10% of the total units. These would include two units to be located within the affordable tenure (one affordable rent and one shared ownership) and four units within the private tenure.
- 8.40 This is in accordance with the needs of families waiting for fully accessible housing on the Common Housing Register. The detailed floor layouts and locations within the site for the wheelchair accessible homes will be conditioned. One disabled accessible parking space would be provided on Caroline Street. For this it is proposed that one of the existing spaces located under the railway viaduct is converted. This would be allocated in accordance with need.

Private and communal amenity space

- 8.41 London Plan policy 3.5, policy SP02 of the Core Strategy and policy DM4 of the Managing Development Document require adequate provision of private and communal amenity space for all new homes.
- 8.42 The private amenity space standard is set at a minimum of 5sqm for 1-2 person dwellings with an extra 1sqm for each additional occupant. All of the units within the affordable tenure would have adequately sized balconies or terraces all meeting or exceeding the minimum standard. Within the private tenure, the vast majority of flats would benefit from private amenity space. Three of the ground floor one bed duplex units and the respective single studio flat on floors 1-6 of Site 1 would not have any private amenity space. This relatively small proportion of units is considered acceptable on balance taking the constrained nature of site 1 into account and all flats would have access to an area of communal amenity.
- 8.43 For all developments of 10 units or more, 50sqm of communal amenity space plus 1sqm for every additional unit should be provided. As such, a total of 96sqm of communal amenity space is required within this development. The scheme provides 95sqm of communal space on the roof of the 5 storey element of the building at Site 1 and 144sqm of communal amenity space on the roof of the 7 storey element of the building at Site 2, when discounting the 93sqm of Child play space the resulting figure exceeds the policy requirements
- 8.44 Overall, the proposed provision of private and communal amenity space would meet the policy requirements and make a significant contribution to the creation of a sustainable, family friendly environment.

Child play space

- 8.45 In addition to the private and communal amenity space requirements, policy 3.6 of the London Plan, policy SP02 of the Core Strategy and policy DM4 of the Managing Development Document require provision of dedicated play space within new residential developments. Policy DM4 specifically advises that applicants apply LBTH child yields and the guidance set out in the Mayor of London's SPG 'Shaping Neighbourhoods: Play and Informal Recreation' which sets a benchmark of 10sqm of useable child play space per child. Play space for younger children should be provided on-site, with older children being able to reasonably use spaces off-site, within a short walking distance.
- 8.46 Using the LBTH child yield calculations, the development is anticipated to yield 11 children (5 under 3s, 4 of 4-10 year olds and 2 of 12-15 year olds). Accordingly; 110sqm of on-site play space is required. Not including private amenity space, the application proposes a total of 93sqm of on-site play space across the two sites. This is focussed towards meeting the needs of the younger age groups. The overall approach is approximately 17sqm under the policy requirements for this site. However, given the space constraints and overprovision of amenity space it is considered acceptable on balance.
- 8.47 For older children, the London Mayor's SPG sees 400m and 800m as an acceptable distance for young people to travel for recreation. This is subject to suitable walking or cycling routes without the need to cross major roads. The proposal does not include any dedicated on-site play space for older children, given the existence of nearby facilities , which St James Gardens playspace being the nearest.

- 8.48 Overall, it is considered that the proposal would provide an acceptable play environment for younger children.

Design

- 8.49 The National Planning Policy Framework attaches great importance to the design of the built environment.
- 8.50 In accordance with paragraph 58 of the NPPF, new developments should:
- function well and add to the overall quality of the area,
 - establish a strong sense of place, creating attractive and comfortable places to live,
 - respond to local character and history, and reflect the identity of local surroundings and materials,
 - create safe and accessible environments, and
 - be visually attractive as a result of good architecture and appropriate landscaping.
- 8.51 Chapter 7 of the London Plan places an emphasis on robust design in new development.
- 8.52 The Council's policy SP10 sets out the broad design requirements for new development to ensure that buildings, spaces and places are high-quality, sustainable, accessible, attractive, durable and well integrated with their surrounds. Further guidance is provided through policy DM24 of the Managing Development Document. Policy DM26 gives detailed guidance on tall buildings and specifies that building heights should be considered in accordance with the town centre hierarchy, and generally respond to predominant local context. Policies SP09 and DM23 seek to deliver a high-quality public realm consisting of streets and spaces that are safe, attractive and integrated with buildings that respond to and overlook public spaces.
- 8.53 The placemaking policy SP12 seeks to improve, enhance and develop a network of sustainable, connected and well-designed neighbourhoods across the borough through retaining and respecting features that contribute to each neighbourhood's heritage, character and local distinctiveness.

Design, massing and scale

- 8.54 The application has been put forward with two sites on Caroline Street, one north of the Railway (Site 1) and one south of the railway (Site 2). Each site consists of a vacant warehouse which most recently operated as lock-up archival storage facilities. They are utilitarian in appearance and are equivalent to around three storeys in height.
- 8.55 Site 1 27-29 Caroline Street is located on the eastern side of Caroline Street. To the east of this site is a vacant area of land which has recently received permission for an 8 storey residential building and 8-12 Radcliffe Cross Street, a warehouse building. Site 1 is north of the railway viaduct and a railway servicing area and to the north the site adjoins 9-19 Caroline Street an attractive three storey Victorian warehouse which is part of the York Square Conservation Area. To the west of Site 1 is the functional western elevation of the Grade II listed Troxy towards the rear of this Art Deco building and a palette storage site behind the Troxy on the corner between Caroline Street and Pitsea Place. The Troxy is also part of the York Square Conservation Area.

- 8.56 Site 2 is just south of the railway viaduct between Caroline Street and Ratcliffe Cross Street. Abutting the site to the south is a four storey residential development called Reservoir Studios. To the east of this site on the other side of Radcliffe Cross Street is a large empty site that has outline permission for a seven and eight-storey mixed-use scheme. To the west of the site there are two car-parks, one next to the arches underneath the railway viaduct and one serving the two residential blocks of Edward Mann Close.
- 8.57 The surrounding area is currently characterised by its varied uses and architecture with large warehouses in the interior of the blocks away from Commercial Road and tighter grain retail units and some new residential development on Commercial Road. To the south by Cable Street are both relatively recent and some older residential development. An emerging residential character can be seen with a number of the existing warehouses and vacant sites being granted permission for high-density residential development.
- 8.58 This change of character is evident within Radcliffe Cross Street and Boulcott Street, the two streets parallel to Caroline Street to the west where there are a number of recently constructed residential buildings. The Councils Development Committee resolved to grant planning permission for a part 7 part 8 storey mixed use residential development at 6 Boulcott Street approximately 67 metres from the application site. South of the railway line, on the east side of Radcliffe Cross Street lies a plot of undeveloped land with permitted outline permission for a part 7, part 8 storey mixed use residential development. On either side of Radcliffe Cross Street, north of the railway line and with one of the sites adjacent to Site 1 there is a large-scale 8 and 9 storey residential development that was recently granted planning permission.
- 8.59 The proximity of the sites to the railway viaduct, other emerging developments and the narrow nature of Caroline Street and Radcliffe Cross Street present design constraints for the development.
- 8.60 The proposed buildings will rise to between 5 and 9 storeys. Building 1 is for a 9 storey residential building that is stepped up from 5 storeys at its north end to 7 and then 9 at its south end nearest to the railway. Building 2 will rise to 8 storeys on the west of the site and 7 storeys on the east of the site.
- 8.61 The step down in heights of Building 1 would provide a transition to the three storey warehouse north of the site within the York Square Conservation Area. The heights and massing have been considered in relation to the emerging scale of development in the area especially the 1-9 Radcliffe Cross Street scheme adjacent to Site 1.
- 8.62 Site 2 would rise above the 4 storey north elevation of Reservoir Studios by 3 stories at the boundary of this site and then be stepped in to full height of the building. It is noted that this building would be higher than Reservoir Studios but it is considered that, given the design and elevation treatment, the difference would not appear significantly out of character for it to be unacceptable. The stepping in above 7 storeys would mitigate the variation in heights. The massing of both buildings is considered to have been well thought through by maximising the development potential whilst respecting the surrounding context so as not
- 8.63 Both sites would have an entrance on Caroline Street and site 2 would have a second entrance on Radcliffe Cross Street. Each of the entrances has been slightly recessed to afford shelter and provide a point of access. Full height glazing is

proposed for the residential lobbies and entrance doors and it is considered that they would provide clear and prominent entrance points from the street.

- 8.64 The elevation treatment and massing have been well thought through and the architects have employed architectural techniques to create articulation and introduce a contemporary industrial aesthetic to the development that references the historic character of the surrounding area. To this end the architects present a simple and robust palette of brick, concrete and steel. The elevations have been designed with a hierarchy of base, middle and top and variation in depths of reveals and articulation to create visual interest.
- 8.65 The buildings would be predominantly clad in dark brown brick with light cement mortar. There would be darker brickwork also with contrasting mortar for approximately 13 courses at the base of the elevation. A lighter buff brick with dark cement mortar would be created on the north of Building 1 and the south of Building 2 to mark the transition between the development and the existing buildings on each end of the development. These transitional elements would also be distinguished by angled metal balustrading in the balconies as opposed to the vertical metal balustrading used elsewhere on the buildings.
- 8.66 There would be deep reveals to window/balcony openings and brick course headers with windows grouped in squares of four on the main elevations. Brickwork feature panels below and above the window/balcony openings of the main elevations would add further definition and visual interest. These would not be present on the transitional elements to provide additional subtle distinction of these elements.
- 8.67 The upper two stories of Site 1 and the eastern element of site 2 would include a glazed brick "lantern" element set back from the main elevations. These would be clad in light cream/white brick with contrasting mortar, full height windows and anodised aluminium colour panels.
- 8.68 The windows and door frames would be made from grey powder coated aluminium. The balconies would all be recessed providing a solid industrial aesthetic. The proposed window details will be conditioned to ensure high thermal and acoustic levels are obtained. Officers consider that careful consideration has been given to the approach to fenestration and balcony locations as well as to the design of entrances.
- 8.69 Secondary elevations including the eastern elevation of site 1 and southern and northern elevations of site 2 would have much less openings. Visual interest is maintained on these large expanses of blank wall with indented sections and high quality brickwork feature panels in the same style as those used above and below the windows on the main elevations.

Heritage

- 8.70 Site 1 is adjacent to the York Square Conservation Area which has its boundary on the southern elevation of 9-19 Caroline Street. The Conservation Area also includes the Grade II listed Troxy opposite. As mentioned above Building 1 steps down successfully to 9-19 Caroline Street and provides a transitional element consisting of different materials and features between the main elevation and this building. Building 1 would be opposite the predominantly blank side wall towards the rear of the Troxy. It is noted that the distinctive front elevation of the Troxy is what provides its heritage value. It is considered that the material palette and industrial aesthetic achieved would correspond well with the historic character of the Troxy and the surrounding buildings of Caroline Street and the conservation area in general.

- 8.71 The design of the proposal has been subject to extensive pre-application discussions between the applicant and Officers. Officers are satisfied that the proposed buildings would be of a very high architectural quality, relate well to their surroundings and enhance the local street scene. The layout and distributions of buildings within the site would create an active high quality environment. Officers are satisfied that the buildings would not have an adverse impact on the adjacent York Square Conservation Area and Grade II listed Troxy building. The high quality design of the proposal would replace a non-descript warehouse building thereby enhancing the setting of the Conservation Area and listed building.

Safety and security

- 8.72 Both sites would benefit from prominent entrances located on Caroline Street and Ratcliffe Cross Street. The proposed entrances and fenestration to the ground floor would result in a high proportion of active frontage. This would result in a high level of passive surveillance and have a positive effect on actual and perceived safety and security.
- 8.73 The Crime Prevention Officer raised a number of potential issues including the distance of the recessed space between the entrance and street, a suggested security door with access/control placed between the entrances and the lifts/stairs and balcony details so as not to be climbing aids.
- 8.74 In response to the advice from the Crime Prevention Design Advisor a condition is recommended on the permission for secure by design standards to be secured for both sites.

Landscaping

- 8.75 There are three areas of communal amenity space: an external 'living room' terrace at the north end of Building 1 above the fifth floor; an external 'living room' terrace at the east of Building 2 above the seventh floor and an amenity courtyard to the south of Building 2 at ground floor. Other landscaped areas include the rooftop PV array and biodiverse green roofs on the top of the duplex 'lantern' elements on both buildings and a lightwell on the north side of Building 2 at the ground floor.
- 8.76 The terrace of Building 1 would include a children's play area with hanging play equipment from a pergola and rubber play surface, containerised planting, low tables and seating for residents with tiled flooring.
- 8.77 The terrace of Building 2 would be enclosed by walls of the building which extend up to the parapet wall, within these walls there would large openings with climbing plants in and around them. Similar to the terrace on Building 2 it would also contain a pergola structure supporting play equipment with rubber play surface, raised planters, timber seating and tile flooring.
- 8.78 The ground floor communal area to Building 2 would contain a hard landscaped area with fern garden and climbing plants trained on wires.
- 8.79 The constrained sites provide limited space for an elaborate landscape scheme; however the proposed landscaping is considered to be well thought out and would be of a high quality.

Amenity

- 8.80 In line with the principles of the National Planning Policy Framework the Council's policies SP10 of the Core Strategy and DM25 of the Managing Development Document aim to safeguard and where possible improve the amenity of existing and future residents and building occupants, as well as to protect the amenity of the surrounding public realm with regard to noise and light pollution, daylight and sunlight, outlook, overlooking, privacy and sense of enclosure.
- 8.81 Site 1 does not currently have any residential properties adjacent to it although the site immediately to the east has recently gained permission for a part 8 part 9 storey residential block. Site 2 immediately bounds the 4 storey Reservoir Studios block to the south and there is an outline permission on a site to the east of Reservoir Studios.

Overlooking and privacy

- 8.82 Policy DM25 of the Managing Development Document requires new developments to be designed to ensure that there is sufficient privacy and that they do not enable an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. The policy specifies that in most instances, a distance of approximately 18 metres between windows of habitable rooms would reduce inter-visibility to a degree acceptable to most people. Within an urban setting, it is accepted that overlooking distances will sometimes be less than the target 18 metres reflecting the existing urban grain and constrained nature of urban sites such as this.

Site 1

- 8.83 In a dense urban context such as this, the proposal must address the sensitive issue of overlooking onto existing properties. The windows in Site 1 on the eastern elevation would be frosted glass louvres (one window each floor) so to protect privacy in relation to the consented scheme at 1-9 Ratcliffe Cross Street. The full height glazed windows on the east elevation of the upper two floors would be 12 metres away and at an angle to a window on 1-9 Radcliffe Cross Street.
- 8.84 The distance between the south elevation of Site 1 and the north elevation of building 2 would be approximately 27 metres, well above the policy requirement.

Site 2

- 8.85 There are no residential properties located directly west of Site 2. There is the outline permission for a mixed use scheme including 57 flats to the east. Reservoir Studios is directly to the south and Building 1 and the recently permitted 1-9 Radcliffe Cross Street would be positioned to the north.
- 8.86 The indicative relationship between the windows and balconies on the east elevation of Site 2 and the possible location of windows/balconies on the outline scheme to the east would also be around 11 metres. Given the adjoining site is an outline consent, the design will need to factor in this development. The separation distance between the north elevation of Site 2 would be more than 25 metres with 1-9 Radcliffe Cross Street and Building 2.

- 8.87 There would be limited fenestration on the south elevation of Site 2 with the sides of balconies the only viewing locations for the lower 6/7 stories. There would be some windows on the 6th, 7th and 8th floors looking south. At this height there would not be inter-visibility between the proposal and the windows on the north elevation of Reservoir Studios.

Outlook and sense of enclosure

- 8.88 The distance between the development proposal and habitable rooms of adjoining properties would follow the separation distances mentioned in the above section and the proposed massing generally would not result in an overbearing appearance or sense of enclosure. The outlook of these properties would not be restricted to an unacceptable level due to appropriate separation distances and setbacks. The south elevation of Site 2 would be positioned close to Reservoir Studios and would have an impact on the north facing windows of this block. This is considered acceptable on balance as the flats in the block are dual aspect with south facing windows as well. These south facing windows would still offer a good level of outlook for these flats.

Daylight and sunlight, overshadowing

- 8.89 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight'. The primary method of assessment is through calculating the vertical sky component (VSC). BRE guidance specifies that reductions in daylighting materially affect the living standard of adjoining occupiers when, as a result of development, the VSC figure falls below 27 and is less than 80% times its former value.
- 8.90 In order to better understand impact on daylighting conditions, should the VSC figure be reduced materially, the daylight distribution test (otherwise known as the no skyline test) calculates the area at working plane level inside a room that would have direct view of the sky. The resulting contour plans show where the light would fall within a room and a judgement may then be made on the combination of both the VSC and daylight distribution, as to whether the room would retain reasonable daylighting. The BRE does not set any recommended level for the Daylight Distribution within rooms but recommends that where reductions occur more than 20% of the existing they will be noticeable to occupiers.
- 8.91 The applicant has submitted a Daylight and Sunlight Assessment prepared in line with the BRE methodology, which looks at the impact of the development on the neighbouring properties.
- 8.92 Currently, the only nearby residential buildings are Edward Mann House and Reservoir Studios. However, two new developments have been given planning permission nearby. The daylight/sunlight assessment considers the existing and consented schemes.

Reservoir Studios

- 8.93 The Reservoir Studios building borders site 2 to the south. It was consented to provide B1 floorspace at ground floor level and 18 live/work and 12 apartments above. The development has been designed in an 'n' shape building, with the primary aspect being a central courtyard, which is also south facing.

- 8.94 A total of 6 rooms have been tested for VSC reductions. These are the central units which are designed as dual aspect with 5 windows each. Two face the application to the north (site 2), and three face the internal courtyard to the south. The rooms are particularly large and deep at 8 metres.
- 8.95 As site 2 is coming forward for development, there will be an impact on particularly the two north facing windows of each of the central units within Reservoir Studios. These windows would lose nearly all of their daylight, typically seeing a reduction between 93 to 95% of their former values. All the south facing windows will be unaffected by the proposal.
- 8.96 The applicants report prepared by NLP report considers the north facing windows to be secondary windows to a large dual aspect open plan space and that the overall loss of light to the room, and given the primary southern aspect considers that the loss of light would not be materially noticeable. Plans of the studios by Hadley Cooper Associates, dating from 2000, show most of these areas as large and undivided, with larger windows to the south, and an additional small kitchen.
- 8.97 It is not known whether there have been further alterations, as each individual occupier could choose to add partitions without the need to seek planning permission.
- 8.98 The applicants report has been independently assessed by the Council by BRE. BRE, note that these affected properties are very deep spaces, more than 8 metres deep, and therefore the unaffected south facing windows would not provide effective daylight to the northern part of each space even if the space remained un-partitioned.
- 8.99 As such, BRE conclude, the severe loss of light to the northern windows (with typical vertical sky components dropping from around 30% down to only 1-2%) would significantly affect the perceived daylight provision in the northern part of each space. As such, officers disagree with the applicant's assessment that there would not be a noticeable impact. The kitchen being relatively small is not normally classed as a habitable room.
- 8.100 However, officers have carefully considered both reports and note the concerns raised by BRE. It is considered that given the existing warehouse is low rised, any development above four storeys is likely to have some impact, the consideration is whether the proposed development has been sensitively designed to protect amenity of surrounding properties. In this particular instance, site 2 has its central courtyard setback significantly to maintain an adequate separation distance from Reservoir Studios, and Reservoir Studios have been designed as dual aspect to benefit from sunlight and daylight from their primary southern aspect.
- 8.101 As such, given Reservoir Studios was designed as dual aspect, it is considered that on balance, the development will not result in an unduly detrimental impact on the daylight effects on Reservoir Studios to warrant a refusal of this application.
- 8.102 Loss of sunlight to Reservoir Studios would be negligible because the new development lies to the north of it.

Edward Mann Street

- 8.103 The nearest five windows of Edward Mann House have been tested and there is no loss of daylight greater than 20%. As such, the impact is acceptable.

1-9 Ratcliffe Cross Street

- 8.104 This development has not yet been constructed but has recently received planning permission. It covers two sites. The larger site (site A in the NLP report) to the east of Ratcliffe Cross Street would not be significantly affected by the proposed development; loss of daylight to all windows would be within the BRE guidelines, as would loss of sunlight to living rooms.
- 8.105 Site B, to the west of Ratcliffe Cross Street, is adjacent to Site 1. South facing windows would be obstructed by the proposed Site 2, which they would face across the railway line. On a typical floor there would be two north facing windows, lighting a kitchen and bedroom, which would be partly obstructed by the proposed Site 1; and there would be another window lighting a bedroom which would face west directly towards Site 1. The vertical sky component results indicate a substantial loss of light for most of these windows.
- 8.106 The Councils Independent consultants has estimated that there would be 17 rooms in Site B which would both have average daylight factors below the recommended levels with the new Caroline Street development in place, and a reduction in daylight as a result of that development. This is due to the height of Site 2. Given, Site 2 is of similar height to site B of the Ratcliffe Cross Street development and they are separated by a railway line, officers consider the relationship and resulting levels of light to be reasonable when considering the wider setting of the sites.

Cable Street

- 8.107 This development incorporates two blocks. It has not yet been constructed but has received outline planning permission. In the southern block only one room on the first floor, would not meet the guidelines, in that the average daylight factor with the new development in place would be less than the recommended 1% and there would be a loss of light. All other rooms in this block would meet the guidelines.
- 8.108 The northern block would be closer to the proposed development. West facing rooms in this block would face the new development across Ratcliffe Cross Street. Loss of light to these rooms on the first and second floors (four rooms in all) would be below the guidelines, in that with the new development in place there would be a reduction in light. However, given this is an outline consent, it has not been constructing and the reserve matter applications which detail the layout of the units has not been submitted, it is considered less weight is given to these properties.

Conclusion

- 8.109 It should be accepted that the general pattern of development in this area is higher and denser than used for setting the targets in the BRE Guidelines and it is therefore appropriate to apply a greater degree of flexibility. Especially given the existing buildings are low rise and redevelopment of the site is likely to have some impact.
- 8.110 The BRE guidelines should be interpreted flexibly and account should be taken of the constraints of the site and the nature and character of the surrounding built form which in this location is characterised by narrow streets with opposing properties in

close proximity to each other. Officers consider that there are impacts; however benefits of the scheme outweigh those impacts given the character and nature of the area.

Noise and Vibration

- 8.111 Policy 7.15 of the London Plan (2015), Policies SP03 and SP10 of the Core Strategy (2010) and Policy DM25 of the Managing Development Document (2013) seek to ensure that development proposals reduce noise by minimising the existing and potential adverse impact and separate noise sensitive development from major noise sources.
- 8.112 Site 1 will be located approximately 6 metres from the railway viaduct and Site 2 is located approximately 4 metres from the railway viaduct. Due to the two site's proximity to the railway viaduct future residents could be exposed to high levels of noise and vibration.
- 8.113 A Noise and Vibration Assessment by Airo accompanied the application. The contents of the report takes into account the glazing specification required to achieve good insulation.
- 8.114 The Councils Environmental Health officer has reviewed the report and has raised no objections to the findings of the report, subject to post completion testing.
- 8.115 Potential noise disturbance from the Troxy which operates at noise sensitive hours was raised in an objection letter. It is considered that the quality of the build and the measures taken above would guard against a significant impact on the amenity of the occupants of the proposed development.
- 8.116 It is the officer's view that considering the site constraints, the proposals are generally in keeping with NPPF, Policy 7.15 of the London Plan (2015), Policies SP03 and SP10 of the Core Strategy (2010) and Policy DM25 of the Managing Development Document (2013).

Transport, Access and Servicing

- 8.117 The National Planning Policy Framework emphasizes the role transport policies have to play in achieving sustainable development and stipulates that people should have real choice in how they travel. Developments should be located and designed to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities, create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians and consider the needs of people with disabilities.
- 8.118 The London Plan seeks to shape the pattern of development by influencing the location, scale, density, design and mix of land uses such that it helps to reduce the need to travel by making it safer and easier for people to access jobs, shops, leisure facilities and services by public transport, walking and cycling. Strategic Objective SO20 of the Core Strategy states that the Council seeks to: "Deliver a safe, attractive, accessible and well-designed network of streets and spaces that make it easy and enjoyable for people to move around on foot and bicycle." Policy SP09 provides detail on how the objective is to be met.
- 8.119 Policy DM20 of the Council's Managing Development Document reinforces the need to demonstrate that developments would be properly integrated with the transport network and would have no unacceptable impacts on the capacity and safety of that

network. It highlights the need to minimise car travel and prioritise movement by walking, cycling and public transport. The policy requires development proposals to be supported by transport assessments and a travel plan.

- 8.120 The site benefits from excellent access to public transport, being located approximately 260 metres to the west of the Limehouse Docklands Light Railway (DLR) and National Rail. Bus no. 15, 115, 135 and D3 all serve Commercial Road. The sites have a Public Transport Accessibility Level (PTAL) of 5.
- 8.121 Overall, the proposal's likely highways and transport impact are considered to be minor and acceptable to the Council's Transportation & Highways section. The relevant issues are discussed below.

Cycle Parking

- 8.122 The London Plan (FALP 2015) policy 6.9 sets the most up-to-date minimum cycle parking standards for residential development. In accordance with these standards, the application proposes 90 (40 in Site 1 & 50 Site 2) secured, covered spaces for residents. The cycle stands would be distributed across the development site with an adequate number of spaces provided within each access core. The storage areas are distributed across the site in a manner that would ensure each residential unit is located within a convenient distance to cycle parking. Due to the constrained nature of the site the cycle stands would be on two tiers. This is not optimal as the parking on the upper level will be less convenient to use however there will still be a significant quantity of stands at ground floor level which will be easily accessible.

Car Parking

- 8.123 Policy DM22 sets out the Council's parking standards in new developments. The application site falls mainly within PTAL 5.
- 8.124 The development would be subject to a 'car free' planning obligation restricting future occupiers from obtaining residential on-street car parking permits, with the exception of disabled occupants or beneficiaries of the Council's permit transfer scheme.
- 8.125 Only one accessible space will be provided as part of the development proposals, which will necessitate converting a single existing on-street parking space such that the use of the space will be exclusively allocated to a disabled driver. It is proposed that one of the existing spaces located under the railway viaduct is converted, which will necessitate amending the current TRO relating to parking restrictions along this section of highway.

Servicing and Refuse Storage

- 8.126 Servicing will take place off-site. The proposed location for the refuse store (for site 1) is located opposite car parking bays. This will block the road during refuse collection and in its current situation is not an acceptable solution. However, there is scope for the parking bay to be removed further south and this is to be secured under a condition.
- 8.127 The refuse arrangement for Site 2 has been altered following comments from the Highway's department. Initially there was a refuse store on Ratcliffe Cross Street however the refuse vehicles are marginally wider than Ratcliffe Cross Street and these vehicles would not be able to turn around. All of the refuse for Site 2 would

now be collected from Caroline Street. These servicing arrangements are acceptable to the Council's Highways Officers.

- 8.128 Further to policy SP05 of the Core Strategy which requires provision of adequate waste storage facilities in all new development, policy DM14 of the Managing Development Document sets out the Council's general waste and recycling storage standards.
- 8.129 The proposed capacity of the waste storage has been calculated for once-weekly collections and is in accordance with current waste policy.

Sustainability and Environmental Considerations

Energy efficiency and sustainability standards

- 8.130 The National Planning Policy Framework sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The NPPF also notes that planning supports the delivery of renewable and low carbon energy and associated infrastructure.
- 8.131 At a strategic level, the climate change policies as set out in chapter 5 of the London Plan, London Borough of Tower Hamlets Core Strategy (SO24 and SP11) and the Managing Development Document Policy DM29 collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 8.132 In line with London Plan policy 5.6, the Core Strategy policy SP11 seeks to implement a network of decentralised heat and energy facilities that connect into a heat and power network. Policy DM29 requires development to either connect to, or demonstrate a potential connection to a decentralised energy system.
- 8.133 The Managing Development Document policy 29 includes the target for new developments to achieve a 50% reduction in CO₂ emissions above the Building Regulations 2010 through the cumulative steps of the Energy Hierarchy.
- 8.134 The proposals have followed the London Plan energy hierarchy of Be Lean, Be Clean and Be Green, and sought to minimise CO₂ emissions through the implementation of energy efficiency measures, and utilise PV's on the available roof area (18kWp). The CO₂ emission reduction measures proposed are supported and would result in a circa 30% reduction against the Building Regulations 2013. Based on the current proposals there is a shortfall to policy DM29 requirements by 15% which equates to 9.53 tonnes of regulated CO₂.
- 8.135 The Planning Obligations SPD includes the mechanism for any shortfall in CO₂ to be met through a cash in lieu contribution for sustainability projects. This policy is in accordance with Policy 5.2 (E) of the London Plan 2015 which states:
- 8.136 '...carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.'
- 8.137 It is proposed the shortfall in CO₂ emission reductions will be offset through a cash in lieu payment. The current identified cost for a tonne of CO₂ is £1,800 per tonne of CO₂. This figure is recommended by the GLA (GLA Sustainable Design and

Construction SPG 2014 and the GLA Planning Energy Assessment Guidance April 2014).

- 8.138 For the proposed scheme it is recommended that a figure of £17,154 is sought for carbon offset projects as identified in the submitted Energy Statement. The shortfall to meet DM29 requirements = 9.33 tonnes/CO₂ x £1,800 = £17,154 offset payment.
- 8.139 With the shortfall in CO₂ emissions met through carbon offsetting contribution, the current proposals are considered appropriate for the development and meet policy requirements for energy and sustainability. It is recommended that the proposals are secured through appropriately worded Conditions with the carbon offsetting payment secured through a S106 agreement.

Biodiversity

- 8.140 Policy 7.19 of the London Plan, policy SP04 of the Core Strategy and policy DM11 of the Managing Development Document seek to protect and enhance biodiversity value through the design of open space and buildings and by ensuring that development protects and enhances areas of biodiversity value in order to achieve an overall increase in biodiversity.
- 8.141 The applicant proposes green roofs on both sites; details of which will be reserved by condition.

Land Contamination

- 8.142 The site has been identified as having potential historic contamination. In accordance with the Environmental Health Contaminated Land Officer's comments a condition will be attached which will ensure the developer carries out a site investigation to investigate and identify potential contamination.

Flood Risk

- 8.143 The application site is not located within a flood risk zone.

Health Considerations

- 8.144 Policy 3.2 of the London Plan seeks to improve health and address health inequalities having regard to the health impacts of development proposals as a mechanism for ensuring that new developments promote public health within the borough while the Council's policy SP03 of the Core Strategy seeks to deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles, and enhance people's wider health and well-being.
- 8.145 Part 1 of Policy SP03 in particular seeks to support opportunities for healthy and active lifestyles through:
- Working with NHS Tower Hamlets to improve healthy and active lifestyles.
 - Providing high-quality walking and cycling routes.
 - Providing excellent access to leisure and recreation facilities.
 - Seeking to reduce the over-concentration of any use type where this detracts from the ability to adopt healthy lifestyles.
 - Promoting and supporting local food-growing and urban agriculture.

8.146 The application proposal would result in the delivery of much need affordable housing. A proportion of housing on site would also be provided as wheelchair accessible or capable of easy adaptation.

Planning Obligations and CIL

8.147 Planning Obligations Section 106 Head of Terms for the proposed development are based on the priorities set out in the adopted Tower Hamlets Planning Obligations SPD (January 2012).

8.148 The NPPF requires that planning obligations must be:

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

8.149 Regulation 122 of CIL Regulations 2010 brings the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests.

8.150 Securing appropriate planning contributions is supported by policy SP13 of the Core Strategy which seeks to negotiate planning obligations through their deliverance in kind or through financial contributions to mitigate impacts of the development.

8.151 The Council's Supplementary Planning Document on Planning Obligations was adopted in January 2012. This SPD provides further guidance on the planning obligations policy SP13.

8.152 The SPG also sets out the Borough's key priorities:

- Affordable Housing
- Employment, Skills, Training and Enterprise
- Community Facilities
- Education

The Borough's other priorities include:

- Public Realm
- Health
- Sustainable Transport
- Environmental Sustainability

8.153 This application is supported by a viability toolkit which details the viability of the development proposal through interrogation of the affordable housing provision and the planning obligations required to mitigate the impacts of this development proposal. The viability appraisal has established that it is viable for the proposal to deliver 28% affordable housing, and an additional payment £173,000 will be payment in lieu for affordable units.

8.154 The proposed heads of terms are:

Financial Obligations:

- a) A contribution of **£173,000** towards Affordable Housing
- b) A contribution of **£17,000** towards Carbon Off-Setting
- c) A contribution of **£20,827** towards employment, skills, training and enterprise initiatives.
- d) **£3,000** towards monitoring fee (2%)

Total £213,827

8.155 The following non-financial planning obligations were also secured:

- a) Affordable housing 28% by habitable room (14 units)
66% Affordable Rent at East Thames levels (9 units)
34% Intermediate Shared Ownership (5 units)
- b) Access to employment
20% Local Procurement
20% Local Labour in Construction
- c) Car free agreement
- d) Highways s278 agreement

8.156 It is considered that the level of contributions would mitigate against the impacts of the development by providing contributions to key priorities. Finally, it is considered that the S106 pot should be pooled in accordance with normal council practice.

Local Finance Considerations

8.157 Section 70(1) of the Town and Country Planning Act 1990 (as amended) provides: "In dealing with such an application the authority shall have regard to:

- a) The provisions of the development plan, so far as material to the application;
- b) Any local finance considerations, so far as material to the application; and
- c) Any other material consideration."

Section 70(4) defines "*local finance consideration*" as:

- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

8.158 In this context "grants" might include the Government's "New Homes Bonus" - a grant paid by central government to local councils for increasing the number of homes and their use.

8.159 It is considered that the level of contributions would mitigate against the impacts of the development by providing contributions to all key priorities and other areas. Finally, it is considered that the S106 pot should be pooled in accordance with normal council practice.

8.160 Members are reminded that that the London Mayoral CIL became operational from 1 April 2012 and would normally be payable. However, officers have determined that

due to estimated amount of the affordable housing relief and the amount of the existing occupied floorspace on site, it is likely that a percentage of the proposal would not be liable for any CIL payments.

8.161 The New Homes Bonus was introduced by the Coalition Government during 2010 as an incentive to local authorities to encourage housing development. The initiative provides un-ring-fenced finance to support local infrastructure development. The New Homes Bonus is based on actual council tax data which is ratified by the CLG, with additional information from empty homes and additional social housing included as part of the final calculation. It is calculated as a proportion of the Council tax that each unit would generate over a rolling six year period.

8.162 Using the DCLG's New Homes Bonus Calculator, and assuming that the scheme is implemented/occupied without any variations or amendments, this development is likely to generate approximately £84,014.00 in the first year and a total payment £509,485.00 over 6 years.

Human Rights Considerations

8.163 In determining this application the Council is required to have regard to the provisions of the Human Rights Act 1998. In the determination of a planning application the following are particularly highlighted to Members:

8.164 Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. "Convention" here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant, including:-

- Entitlement to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law in the determination of a person's civil and political rights (Convention Article 6). This includes property rights and can include opportunities to be heard in the consultation process;
- Rights to respect for private and family life and home. Such rights may be restricted if the infringement is legitimate and fair and proportionate in the public interest (Convention Article 8); and
- Peaceful enjoyment of possessions (including property). This does not impair the right to enforce such laws as the State deems necessary to control the use of property in accordance with the general interest (First Protocol, Article 1). The European Court of Human Rights has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole".

8.165 This report has outlined the consultation that has been undertaken on the planning application and the opportunities for people to make representations to the Council as local planning authority.

8.166 Members need to satisfy themselves that the potential adverse amenity impacts are acceptable and that any potential interference with Article 8 rights will be legitimate and justified. Both public and private interests are to be taken into account in the exercise of the Council's planning authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. Members must,

therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

8.167 As set out above, it is necessary, having regard to the Human Rights Act 1998, to take into account any interference with private property rights protected by the European Convention on Human Rights and ensure that the interference is proportionate and in the public interest.

8.168 The balance to be struck between individual rights and the wider public interest has been carefully considered. Having taken into account the mitigation measures governed by planning conditions and the associated section 106 agreement, officers consider that any interference with Convention rights is justified.

Equalities Act Considerations

8.169 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, gender and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and the Committee must be mindful of this duty inter alia when determining all planning applications. In particular the Committee must pay due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.170 The proposed contributions towards, commitments to use local labour and services during construction, apprenticeships and employment training schemes, provision of a substantial quantum of high quality affordable housing and improvements to permeability would help mitigate the impact of real or perceived inequalities and would serve to support community wellbeing and promote social cohesion.

9.0 CONCLUSION

9.1 All other relevant policies and considerations have been taken into account. Planning permission should be GRANTED for the reasons set out in the EXECUTIVE SUMMARY and MATERIAL PLANNING CONSIDERATIONS sections and the details of the decision are set out in the RECOMMENDATION at the beginning of this report

10.0 SITE MAP

