



Application for Planning Permission [click here for case file](#)

Reference	PA/20/00788
Site	Southern Grove Lodge, 58-60 Southern Grove, London, E3 4PN
Ward	Mile End
Proposal	Demolition of 1980s office building (including annex connection to Southern Grove Lodge) and construction of a part-4, part-5, part-6 storey Class C3 residential apartment block (to provide 42 units of affordable housing); change of use/conversion/refurbishment (including installation of replacement roofs/rooflights and windows) of Southern Grove Lodge into Class C3 residential use (to provide 36 private for sale units); provision of associated amenity areas, cycle and car parking (in the form of 5 x accessible parking bays), refuse/recycling stores and landscaping.
Summary Recommendation	Grant planning permission, subject to conditions.
Applicant	London Borough of Tower Hamlets
Architect/Agent	Renew Planning
Case Officer	Nelupa Malik
Key dates	<ul style="list-style-type: none">- Application registered as valid on 16/04/2020- Letters sent to neighbours on 30/04/2020

EXECUTIVE SUMMARY

The application site measures 0.5 hectares in area and comprises Southern Grove Lodge; a Victorian former workhouse constructed in c1872 and a 1980s office building currently occupied by Veolia who are due to relocate to their depot in Blackwall. Southern Grove Lodge was previously in office use however the building has been vacant for a period of at least 13 years.

Southern Grove Lodge is a non-designated heritage asset and part of the site which includes the former workhouse and the eastern boundary of the application site falls within the Tower Hamlets Cemetery Conservation Area.

The site is bound by 3/4-storey Victorian dwellings to the east in Brokesley Street and 4-6 storey residential flatted developments running from north to west comprising Tracy House, Buttermere House, Coniston House and Derwent House. To the south of the site is the Beatrice Tate Special Educational Needs School.

This application proposes to demolish the existing office building occupied by Veolia and construct a part 4,5 and 6-storey residential building in the northern part of the site. The block (identified as Block A) will accommodate 42 residential units, all of which will be affordable. Southern Grove Lodge (identified as Block B) will be refurbished and converted to provide 36

residential units for private sale. This application has been submitted by the Council as part of the Council's housing delivery programme.

The scheme will deliver 63% affordable housing based on habitable rooms, providing a tenure split of 71:29 between affordable rent and intermediate and in favour of affordable rent. Block A will provide 15 units at London Affordable Rent, 15 units at Tower Hamlets Living Rent and 12 units at London Living Rent.

In land use terms, the loss of office floorspace is a policy conflict however this is considered to be justified and outweighed by the existing low occupancy levels of the office building, the underutilised nature of the site as a whole and the planning benefits which would result from the proposed development. The development would contribute to the broader regeneration of the area and assist in the delivery of much needed new and affordable housing thus contributing to meeting the Council's housing targets and increasing the Borough's housing stock.

The design, height, scale, form and massing of Block A will be contemporary, modern and sensitively responds well to Southern Grove Lodge; thus preserving this heritage asset. The character and appearance of both Southern Grove Lodge and the Tower Hamlets Conservation Area will be enhanced as a result of the proposals.

Within Southern Grove Lodge, 12 units will have minor shortfalls in internal floorspace standards and none of the dwellings in this building would have access to private amenity provision. However, Officers accept that the need to retain the former workhouse building, with limited internal structural and external changes has resulted in design constraints. All the dwellings within Block A will meet London Plan standards for internal floorspace and private amenity provision.

Similarly, due to constraints within Southern Grove Lodge, the development is unable to provide 10% wheelchair housing (6% provided) across the site, however 12% (5 units) of the total number of units within Block A will be wheelchair accessible.

The proposal would provide communal amenity space and dedicated children's play area in accordance with the minimum policy requirements. The scheme would provide 275sqm of communal amenity space and 559sqm of children's play. There would be a marked improvement in the general soft and hard landscaping quality of the site with a strategy that incorporates biodiversity enhancements including the provision of new trees, bird nesting and bat roosting boxes, a living roof and an excellent range of nectar plants and meet policy requirements.

The proposal is not considered to have any material impact on the amenities enjoyed and living standards of neighbouring occupiers in relation to matters concerning daylight, sunlight, overshadowing, outlook or sense of enclosure.

The proposal would be 'car free' with the exception of 5 blue badge spaces and cycle parking will be provided in accordance with the current London Plan and Draft London Plan requirements. The site has an excellent Public Transport Accessibility Level (PTAL) of 6a and therefore the car free nature of the development is supported. Of the blue badge spaces, 1 will be fitted with an active electric vehicle charging point (equating to 20%) whilst the remaining spaces (equating to 80%) will be installed with passive infrastructure in accordance with Draft London Plan requirement.

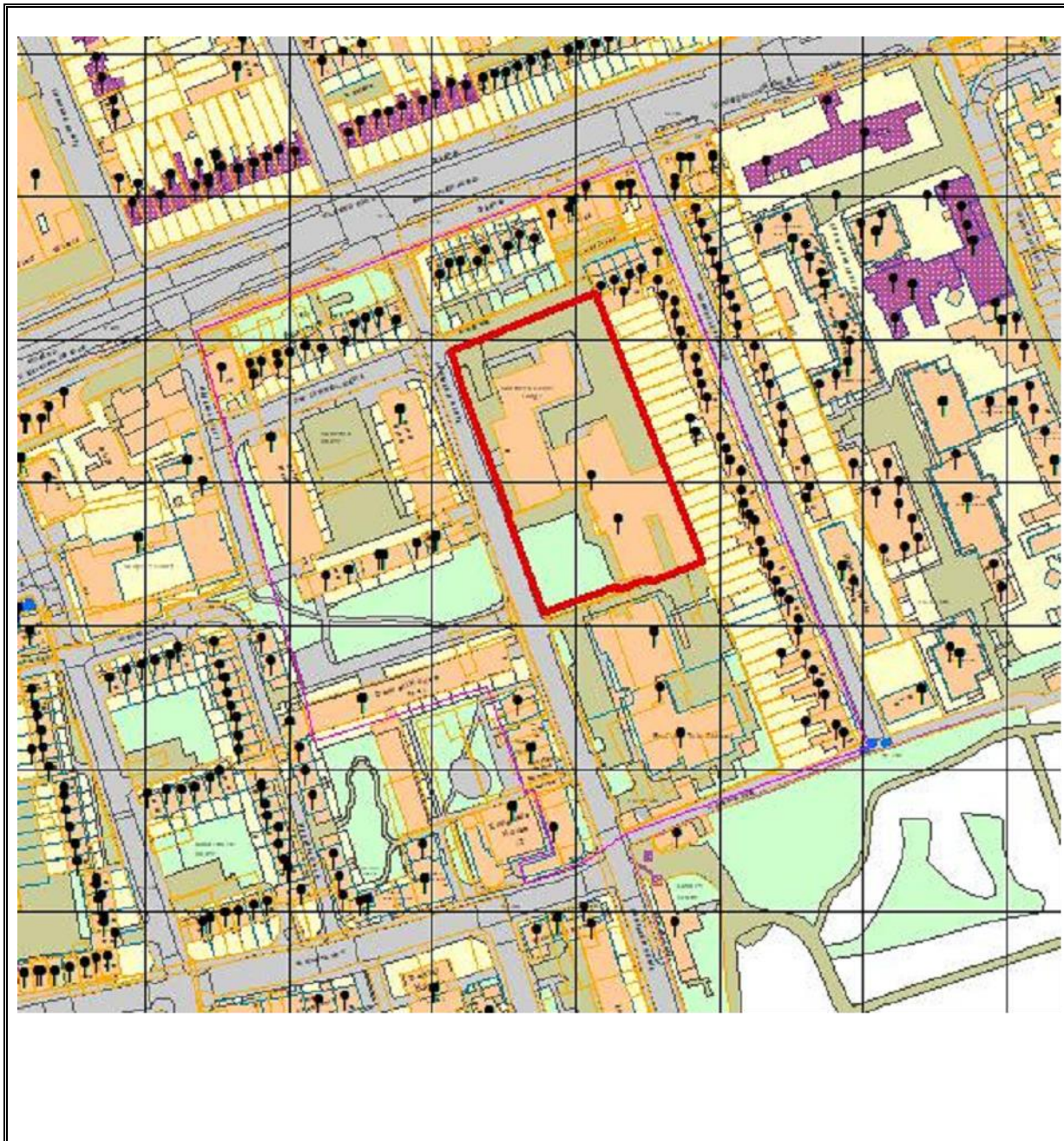
Delivery and servicing for the development will take place either from Southern Grove or from within the development site however full details of this will be secured via a condition requiring a delivery, servicing and waste management plan.

The proposal achieves an on-site reduction in carbon dioxide emissions of 76.3% thus exceeding the policy requirement for a minimum of 45% reduction in carbon dioxide emissions through on-site provision.








The application has been considered against the Council's adopted planning policies contained in the London Borough of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (January 2020) as well as the London Plan (2016), the National Planning Policy Framework and all other material considerations. Officers have also considered the application against the Draft London Plan (2019) as this carries substantial weight.

Officers recommend the proposed development be granted planning permission, subject to conditions.

SITE PLAN:



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<ul style="list-style-type: none">  Planning Application Site Boundary  Other Planning Applications  Consultation Area  Land Parcel Address Point  Locally Listed Buildings  Statutory Listed Buildings 	<p>Planning Applications Site Map PA/20/00788</p> <p>This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process</p>	 <p>TOWER HAMLETS London Borough of Tower Hamlets</p>
	<p>Scale : 50m grid squares</p>	<p>Date: 29 September</p>

1. SITE AND SURROUNDINGS

- 1.1 The application site measures approximately 0.5 hectares and is located directly east of Southern Grove. The site is rectangular in shape and is occupied by two buildings; Southern Grove Lodge, a detached Victorian building positioned at the southern end of the site and comprises a former workhouse (formerly known as the Whitechapel Union workhouse), designed by architect Richard Robert Long and constructed in c.1872. The northern part of the site accommodates a 4-storey late 20th century constructed office block. The office block is physically connected to the western elevation and the northern wing of the workhouse via a single storey link extension. The office building is currently partially occupied by Veolia who have largely relocated to their Blackwall Depot.
- 1.2 Southern Grove Lodge is a 3-storey building with a twin-gabled central entrance block flanked by northern and southern wings constructed from London Stock brick with slate roofs. Behind the central entrance block is a 3-storey 'E' wing (designed by Bruce J Capell and constructed in 1898) which includes a ground-floor dining hall. There is also a single storey extension to the south-east, containing a kitchen, scullery and boiler house.
- 1.3 In the latter part of the 19th century the workhouse was extended to provide two 'pavilion' blocks positioned to the north and south of the main building and further expansion included the erection of two x 3-storey lavatory towers at the end of the two wings of the main central block. By the late 1960s, the surrounding area was subject to substantial post-war redevelopment. Whilst the main Victorian building survived, the pavilion blocks and ancillary buildings were demolished by the early 1970's. The Victorian building has been vacant since 2007 having last been used by the Council for office accommodation. An aerial view of the site and the red-line boundary can be seen in figures 1 and 2 below.



Figure 1: Aerial View of the Site.

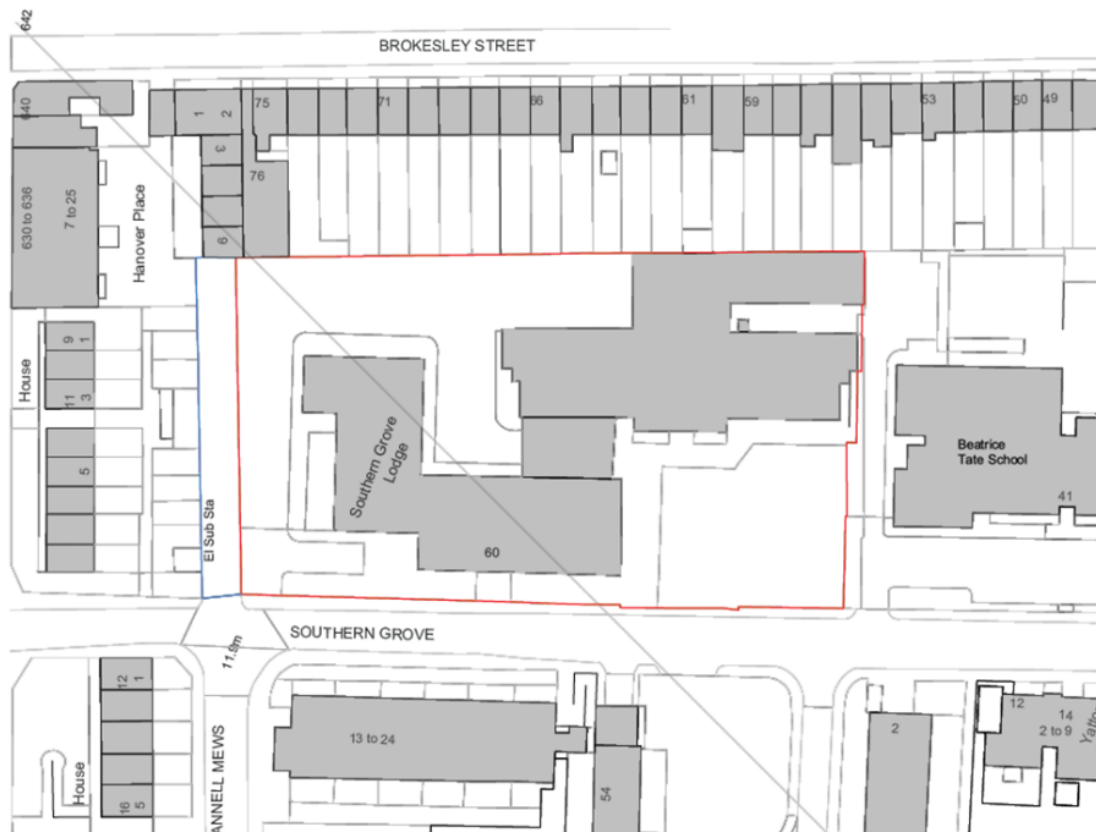


Figure 2: Existing Site Plan.

- 1.4 The remainder of the site comprises a mixture of hardstanding areas for servicing and vehicular access/parking and soft landscaping on the south-western part of the site. Vehicular access to the site is obtained via an access point off Southern Grove at the far north-western corner of the site.
- 1.5 The surrounding area comprises a number of residential flatted blocks including Tracy House and Buttermere House; both 4-storey buildings to the north and north-west of the site respectively and face onto Mile End Road. On the opposite side of Southern Grove are Coniston House; a 4-storey building to the west and Derwent House; a 6-storey building to the south-west of the application site. Buildings located further south-west include Yatton House; a 4-storey building which occupies the Southern Grove Community Centre at ground level and Ennerdale House; a 19-storey residential tower block.
- 1.6 The entire eastern boundary of the application site adjoins the rear gardens of Brokesley Street which is defined by a long terrace of 3-4-storey Victorian Houses. The southern boundary of the site adjoins the northern boundary of the Beatrice Tate School; a 3-storey Special Educational Needs school. The school site sits directly north of Tower Hamlets Cemetery Park.
- 1.7 Southern Grove Lodge and the entire eastern boundary of the application site lies within the Tower Hamlets Cemetery Conservation Area. Whilst not locally or statutorily listed, Southern Grove Lodge is a non-designated heritage asset. The office building occupied by Veolia lies outside of the Conservation Area. The Conservation area also includes the Victorian dwellings in Brokesley Street and Tower Hamlets Cemetery. The boundary walls and Cemetery entrance gates fronting Southern Grove and running along the southern edge of the Beatrice Tate School are listed.

- 1.8 There are no other listed buildings within the immediate vicinity of the site however, the St Clements Hospital site located at least some 70 metres to the north-east contains two grade II listed buildings and listed Ironwork and railings. There are also a number of listed buildings on the northern side of Mile End Road. The boundary of the Conservation Area and nearby listed buildings can be seen in the figure 3 below:

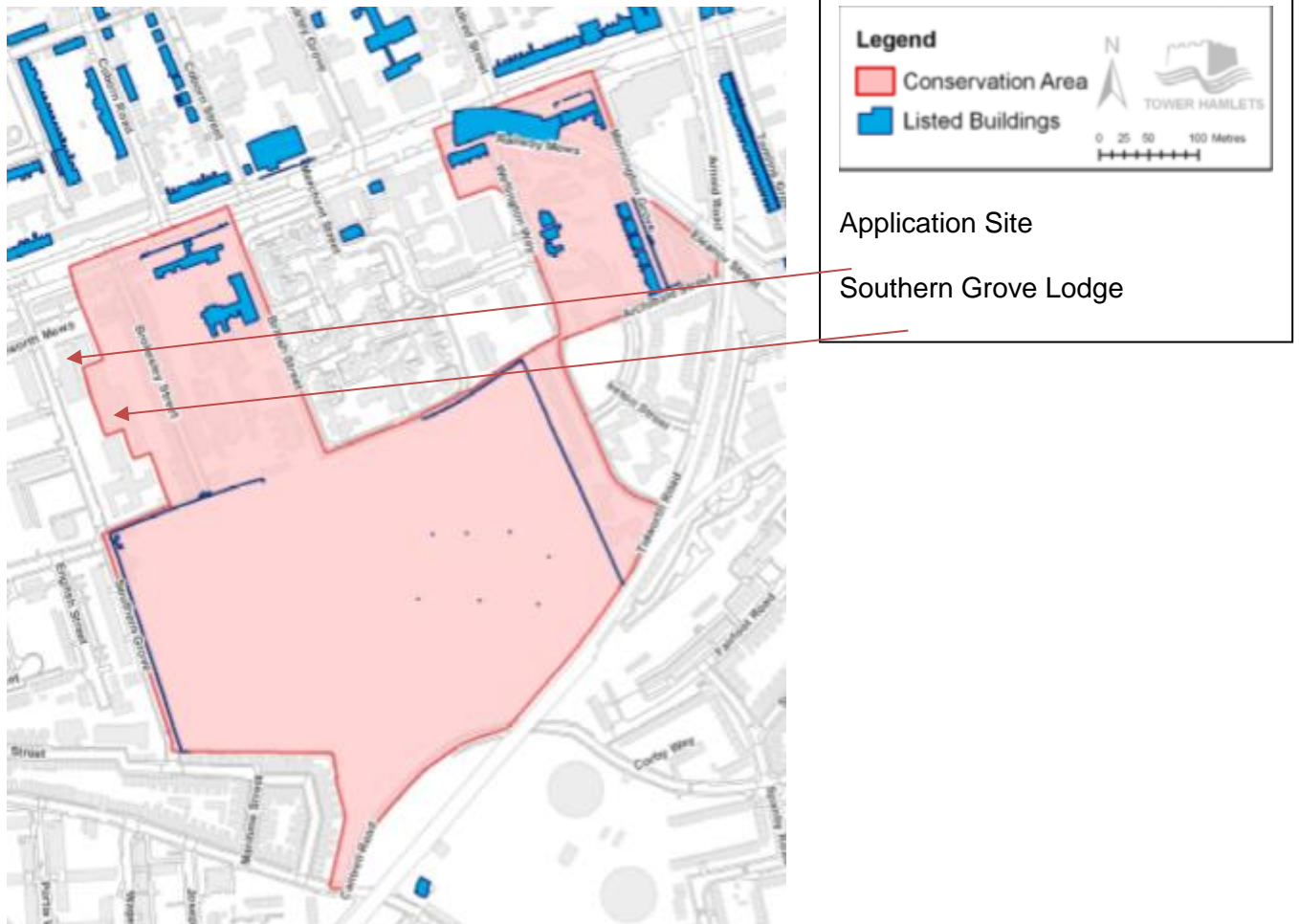


Figure 3: Tower Hamlets Cemetery Conservation Area Boundary

- 1.9 The site has a PTAL (Public Transport Accessibility Level) of 6a which is excellent on a scale of 0-6b; with 0 being the worst. Mile End station is located within approximately 12 minutes walking distance to the north-west. A number of bus routes are served by bus stops along Mile End Road within close proximity of the site.

2. PROPOSAL

- 2.1 This application relates to the demolition of the existing office block and the construction of a part 4, 5 and 6-storey residential building. This building is identified as Block A for the purpose of this application. Block A will be located on the northern end of the site and will provide 42 residential units comprising 9 x 1-bed, 14 x 2-bed, 14 x 3-bed and 5 x 4-bed flats. All the units within Block A will be affordable comprising a mixture of affordable rented and intermediate tenure.
- 2.2 The proposal also seeks the change of use, refurbishment and conversion of Southern Grove Lodge to provide 36 dwellings comprising of 9 x studios, 10 x 1-bed, 13 x 2-bed and 4 x 3-bed flats. Southern Grove Lodge is identified as Block B for the purpose of this application. All the units within Block B will for private sale on the open market.

- 2.3 Block A will be constructed in two yellow toned bricks intercepted with a brown/red rainscreen cladding to provide visual breaks within the massing of the built form. The 6th floor of Block A will be recessed and cladded in the same rainscreen cladding.
- 2.4 External alterations to Southern Grove Lodge include making good the northern wing on the western elevation of the building where the current Veolia office building physically joins Southern Grove Lodge. All the windows and doors will be replaced by double glazed timber framed windows and doors and painted dark grey.
- 2.5 The cycle parking for the development will be located in two key storage areas both within the building envelope of Block A. However, it should be noted that the cycle parking storage for Southern Grove Lodge will not be accessible by occupiers of Block A.
- 2.6 The remainder of the site seeks to provide amenity areas comprising a mixture of communal amenity areas, children's play space and general landscaping. 5 blue badge parking spaces will be provided on-site.



Figure 4: CGI of proposal viewed from Southern Grove.

3. RELEVANT PLANNING HISTORY

3.1 Application Site:

PA/20/00634 – Temporary use of the site for two years to house a two-storey modular building prototype. Permitted 04/06/2020.

PA/19/00245 - x1 London Plane Tree - to be re-pollarded back to its previous pruning points at approx. 4m from ground level x1 False Acacia Tree - reduce uneven crown and reduce its

height Felling of x7 Wild Cherry Trees, x1 Holm Oak Tree and x1 Laural Tree. Permitted 26/02/2019.

PF/19/00140 – Preapplication: Proposed redevelopment comprising demolition of existing office block and development of a residential apartment block (of affordable housing) and change of use/conversion of Southern Grove Lodge into housing (in the form of private rented sector).

PA/03/01770 – Submission of sample window pursuant to condition 3a of conditional permission dated 24th October 2003, reference PA/03/1254. Permitted 06/01/2004.

PA/03/01254 – Installation of replacement UPVC windows. Permitted 24/10/2003.

PA/03/00636 – External kitchen extraction system from ground floor level to roof level (retrospective planning application). Application withdrawn.

PA/99/01068 – Temporary location of portacabin in rear car park area for office accommodation. Permitted 19/11/1999.

PA/99/00756 – Approval of details pursuant to Condition 2 (details of enclosure of the ventilation equipment and details of sound attenuation measures) of planning permission dated 21 April 1999 reference no. TH5840/PA/99/00070. Permitted 03/08/2000.

PA/99/00070 – Installation of ventilation equipment and alterations to façade of building. Permitted 21/04/1999.

PA/73/00572 – Erection of day centre for the elderly. Permitted 07/02/1973.

PA/72/00581 – Erection of 35-bed Home and Social Centre for the younger Physically Handicapped at Southern Grove Lodge, Southern Grove, Tower Hamlets. Permitted 14/04/1972.

PA/68/00529 – The change of use of part of Southern Grove Lodge, Southern Grove, Tower Hamlets, on the upper part of the central block, from residential accommodation to office floor space not exceeding 8,597 sq.ft. Permitted 21/05/1968.

PA/52/00748 – The carrying out of war damage repairs to the church, The City of London and Tower Hamlets Cemetery, Southern Grove, Stepney, to the extent of £6881-14-10. Permitted 29/05/1952.

PA/51/00779 - The erection and retention, for a limited period, of a single-storey pre-fabricated building on a site in SOUTHERN GROVE, STEPNEY, as shown on plans Regd. No. 29690. 24/04/1952.

PA/49/00997 – The execution of alterations and repairs to the Southern Grove (Hamlets Cemetery) wall, Stepney, in the sum of £1,593.14s. Permitted 01/03/1949.

3.2 Neighbouring Sites:

PA/17/02373/A1- Construction of 2-storey roof extensions to Buttermere House, Coniston House, Derwent House, Windermere House and Loweswater House: residential conversion of ground level garages to Windermere House and Wentworth House and Wentworth Mews; infill units to Levels 1-4 of Windermere House to provide a total of 142 new dwellings: access and servicing including car parking spaces for disabled motorists; cycle parking spaces and incidental works. Permitted 14/01/2020.

4. PUBLICITY AND ENGAGEMENT

4.1 Upon validation of the application, the Council sent out consultation letters to 260 nearby owners and occupiers on 30th April 2020. An advert was posted in the press and a Site Notice was displayed outside the site.

4.2 One letter of support was received stating that this is a welcomed development on a neglected site.

4.3 Three letters of objection have been received. The themes and issues raised can be summarised as follows:

- Right to Light under “The 1832 Act” will be affected.
- Overshadowing to objector’s property.
- Loss of daylight/sunlight.
- Loss of air.
- Overlooking and loss of privacy.
- Increase in anti-social behaviour as a result of amenity areas being open to the general public.
- The trees proposed are not evergreens and not suitable to preserve privacy levels.
- The development will disturb and result in the loss of bird nests in neighbouring garden.
- Noise pollution from construction works.

Officer Comment:

The objection relating to “The 1832 Act” refers to common law Prescription Act 1832 and is a civil matter that is not legislated by Planning Legislation. As such, no weight can be given to this objection. The proposal will not result in the loss of air. There is no evidence to suggest that this proposal will result in anti-social behaviour. This is a speculative objection that limited weight can be given to. Notwithstanding this, the development will need to ensure that standards relating to Secure by Design are met, and this will be secured via planning condition. The landscaping strategy for the development including the species of trees are supported by the Council’s Biodiversity Officer. There is no evidence to suggest that the development will materially impact on bird nests present in neighbouring gardens. Matters relating to loss of sunlight/daylight, overlooking and loss of privacy are considered in the main body of this report. A scheme of this nature would inevitably result in some disturbance from construction works however this would be temporary in nature and cease on completion of the development. Measures to mitigate against noise pollution will be secured via condition.

4.4 The applicant undertook two public consultation events on 18th and 20th July 2019 which was held on site within the Veolia office building. 24 members of the public attended the events in total.

4.5 The scheme has evolved through pre-application discussions with planning officers since July 2019.

5. CONSULTATION RESPONSES

Internal Consultees

LBTH Building Control

- 5.1 No comments received.

LBTH Design and Conservation

- 5.2 The Whitechapel Union Workhouse was built c1872. After becoming a hospital, it was used as council offices for some years. An office building was built to the north of the older building in the 1980's connected to it by a flat roofed single storey structure.
- 5.3 The surviving Workhouse building is included within the Tower Hamlets Cemetery Conservation Area. The building is considered to be a non-designated heritage asset. The former Workhouse is of three storeys with a pitched slate roof. The main facade faces Southern Grove and is symmetrical with a central entrance door. The centre of the building is emphasised by twin gables and a distinctive rooftop cupola. The building is of brick with robust details characteristic of the period in which it was built. The windows are sashes in a variety of designs.
- 5.4 The Victorian buildings comprise the main block of 1872 designed by Richard Robert Long along with late nineteenth century alterations carried out by Bruce J Cappell in the form of towers accommodating lavatories and rear extensions including the dining hall, kitchens, scullery and boiler house.
- 5.5 The building is an important part of the Tower Hamlets Cemetery Conservation Area. The Tower Hamlets Cemetery Conservation Area boundary is drawn tightly around the former Victorian workhouse. Post war housing blocks are located to the east and north of the site. The western end of a Grade II listed early nineteenth century, three storey terrace (within the Tredegar Square Conservation Area) is visible in views north along Southern Grove and the Grade II listed brick boundary wall of Tower Hamlets Cemetery is a minor element in views to the south. The rear of terraced houses on Brokesley Street are to the east of the former workhouse – these are included within the Tower Hamlets Conservation Area. Immediately to the south of the site is the recently built Beatrice Tate School.
- 5.6 The construction of the office block at the northern end of the site, in the 1980's, harmed the setting of the Victorian building. The newer building of red brick with red metal window frames and external brise soleil-type elements, sits very uncomfortably in relation to the symmetrical facade of the Victorian building – partially obscuring the northern end of the symmetrical frontage.
- 5.7 There is much scope to significantly improve the setting of Southern Grove Lodge. In the current proposal, the 1980's office building is demolished. A new block to the north of the Victorian building is positioned so as to reveal the full width of the historic facade enabling much better appreciation of the building from Southern Grove. Sympathetic repairs/reinstatement will be necessary following removal of the single storey link between the 1980's office block and the Victorian building. The proposed new block is mostly built of brick. It is sensitively located, of simple design and would form a relatively modest neighbour to the retained Victorian building. The proposed block, replacing the 1980's office block does not harm the setting of nearby heritage assets and improves the setting of the Workhouse. It is proposed to convert the Victorian buildings into residential accommodation.
- 5.8 Existing window openings are retained and to replace the window frames. Original windows should be retained and repaired wherever possible. It is proposed to undertake works to the existing roof structure. The extent of replacement of the structure is not fully clear. Existing slates should be reused where possible, supplemented with matching natural slates as necessary.

- 5.9 The existing main entrance would continue to serve as the main entrance of the proposed residential block. At present there is a poorly designed ramp at the main entrance of the Victorian building, there is significant scope to create a more sympathetic entrance arrangement.
- 5.10 A new central path would lead up to the main entrance from Southern Grove, emphasising the symmetry of the historic facade. The area immediately in front of the central element of the Victorian building has been designed as a small formal garden. It is unfortunate that there would be some car parking in front of the northern part of the Victorian building. Railings are proposed along the edge of the site.
- 5.11 The development would enhance the character and appearance of the conservation area by restoring the exterior of the Victorian building and by removing the unattractive 1980's office building. Detailed design would be important, and conditions should be attached to any permission in order to secure the necessary quality. The new building better reveals the significance of the surviving Victorian Workhouse.

LBTH Transportation and Highways

- 5.12 All future residents will be subject to a 'Permit Free' agreement (excepting Blue badge holders and those who may qualify under the Permit Transfer Scheme) restricting them from applying for parking permits on the public highway.
- 5.13 The offer to provide 3-year car club membership is not supported as the Council no longer incentivises car use and would not push for this to be included. However, it is noted that the car club bays are existing.
- 5.14 Five accessible parking bays are proposed, and these should be on a lease use and not sold and allocated on need. It should be noted that not all blue badge holders require wheelchairs and the bays should be allocated on a need's basis.
- 5.15 The parking spaces appear quite distant from some of the units and it would appear that to access the units from the car park some residents would need to exit the site and use the Southern Grove footway via the vehicle crossover. The applicant should ensure that level access is provided from vehicle to door and we would wish to see an access plan showing how residents with a parking space (concentrating on the WCH initially) can easily access these spaces.
- 5.16 The accessible bays should be available to all tenures and should planning permission be granted we will require a condition which restricts their use to their approved use only for registered blue badge users associated with the development only and not to be rented or sold for users outside the development. These bays are also to be retained and maintained for their approved use only for the life of the development.
- 5.17 With regards cycling the applicant is proposing to provide to the Intend to Publish London Plan Standards.
- 5.18 The plans do not show two separate stores as mentioned but one large store. Only one store has space for larger / adapted cycles, and we would expect access to larger spaces to be made more widespread.
- 5.19 The stores, like the parking, are some distance from some of the units, particularly those in the southern side of the site. Cycle provision should, amongst other things, be convenient and this does not appear to be the case. The applicant should identify how the cycle stores are accessed from the more distant parts of the site and whether this distance places a barrier on their use?

- 5.20 In terms of servicing the applicant undertook good pre-application discussions with the Highways Group on this aspect and the proposals are generally acceptable.
- 5.21 There are proposed changes to the highway layout in terms of removal of existing crossovers, provision of a new crossover and changes to the on-street parking layout (resulting in the net removal of one parking bay on Southern Grove) and ensuring a level surface is provided for accessing the parking bays along the public highway. These changes will require funding via the applicant through a s278 agreement with the Highways Authority. The applicant is required to agree a scheme of highway works with the Highway Authority.
- 5.22 The applicant needs to consider the demolition and construction aspects of this site and is required to submit a Demolition and Construction Management Plan as a condition to any planning permission which may be granted. No works should start on site until this plan is agreed with the Local Planning Authority/Highway Authority.

Officer Comment:

The applicant has provided access plans as requested by the Highways Team. The Highways Officer has advised that whilst there is still concern that there are no cycle stores closer to the southernmost core, as the arrangement has been informed by design in the pre-application process that this is accepted.

LBTH Affordable Housing

- 5.23 This scheme proposes a 64% quantum of affordable housing, by habitable rooms, this is well above the Council's minimum 35% and aspirational 50% and it therefore supported.
- 5.24 The tenure split between the rented and intermediate at 72:28 is broadly in line with the Council's 70:30 policy. Given the generous overall quantum of affordable housing being proposed, the marginal deviation is acceptable.
- 5.25 The applicant as agreed that the rented units will come forward in line with the Council's requirement for 50% to be at London Affordable Rents and 50% at Tower Hamlets Living Rents. The rent levels are:

London Affordable Rent (exclusive of service charges)

1bed	£155.13 per week
2bed	£164.24 per week
3bed	£173.37 per week
4bed	£182.49 per week

Tower Hamlets Living Rents (inclusive of service charges)

1bed	£197.18 per week
2bed	£216.90 per week
3bed	£236.62 per week
4bed	£256.33 per week

- 5.26 Should permission be granted; these are the values that will need to be captured in the s106 agreement.
- 5.27 The intermediate provision on this scheme will come forward as London Living Rent. This is a product we want to see more of in the borough especially for larger units as it would be a more affordable option than shared ownership.

- 5.28 The unit mix within the rented would see a 23% provision of one beds against a policy target of 25%, a 30% provision of two beds against a policy target of 30%, 30% provision of three beds against a 30% target and 17% provision of four beds against a 15% target. This mix is broadly in line with Council targets and supported.
- 5.29 The unit mix within the intermediate is for a 17% provision of one beds against a 15% target, a 42% provision of two beds against a 40% target and a 42% provision of three beds against a 40% target. The mix within the intermediate mix is broadly compliant with Council targets.
- 5.30 There are no wheelchair units proposed in the market tenure. This is due to the fact that all of these units are in a building that contained a Victorian Workhouse (Block B). With the constraints of the building and the need to conserve it during the conversion, it would not be possible to deliver suitable wheelchair units in this building.
- 5.31 However, all of the affordable units will come forward as new build in Block A and here there will be 5 wheelchair units. This equates to 12% of the affordable units. The provision will contain 2 two bed units and 2 three bed units for rent as well as 1 two bed intermediate unit. It should be ensured that the wheelchair units for rent are compliant with Part M 4 (3) (2) (b) of Building regulations.
- 5.32 The Council's Occupational Therapists will need to be consulted on the design and layouts for each rented wheelchair unit type. Given that this a Council led scheme providing family sized wheelchair units on the ground floor, it is imperative that the design and layouts meet the needs of the Occupational Therapists.

Officer Comment:

It should be noted that subsequent to receipt of the above comments the submitted schedule of accommodation has been updated to reflect the accurate number of habitable rooms. As such the proposal would provide 63% affordable housing based on a 71:29 split between affordable rent and intermediate and in favour of affordable rent. The full assessment of the affordable housing breakdown and unit mix is considered in the housing section of this report. The Council's Occupational Therapists have been consulted separately and have no objections to the proposal.

LBTH Viability

- 5.33 The scheme broadly meets the requirement for a fast track application (i.e. it does not need to undergo scrutiny from the Viability Team or its consultants, as the Council is satisfied that the proposed scheme is to deliver an acceptable, policy-compliant level of affordable housing) provided there are no further amendments and clarification is provided in relation to the fast track exceptions.
- 5.34 To qualify for fast track, normally a proposal would have to deliver a minimum of 35% affordable housing on a habitable room basis. However, this site is owned by LBTH (publicly owned) and as such the minimum provisions required for fast track is 50% (this scheme is proposing 64% Affordable Housing on-site according to the schedule). Furthermore, the following requirements must also be met for the scheme to be fast tracked:
- 5.35 Affordable Housing Tenure Split – The proposal must meet the Council's tenure split requirements between affordable rented products (70%) and intermediate products (30%). Within the affordable rented product, the split must be 50:50 between TH Living Rent and London Affordable Rent products. This scheme is proposing 72% affordable rented products and 28% intermediate products, which is not absolutely compliant therefore Development Management can exercise discretion.

- 5.36 Unit Size Mix – The proposal should meet the Council’s unit size requirements for both market and affordable elements as outlined in the Local Plan. There is a degree of flexibility to this aspect subject to the approval of the Council’s Strategic Housing Team.
- 5.37 Any application proceeding via fast track must be subject to an early-stage review if it is not implemented within two years. Therefore, provision for this must be included in the Section 106 agreement.

Officer Comment:

- 5.38 *The early stage review mechanism shall be secured via condition.*

LBTH Occupational Therapists

- 5.39 The proposed wheelchair user units have been reviewed by the Occupational Therapists and no objections have been expressed to the proposal.

LBTH Enterprise and Employment

- 5.40 The developer should exercise best endeavours to ensure that 20% of the construction phase workforce will be local residents of Tower Hamlets. The Economic Development Service will support the developer in achieving this target through providing suitable candidates through the Workpath Job Brokerage Service.
- 5.41 To ensure local businesses benefit from this development we expect that 20% goods/services procured during the construction phase should be achieved by businesses in Tower Hamlets. The Economic Development Service will support the developer to achieve their target through ensuring they work closely with the council’s Enterprise team to access the approved list of local businesses.
- 5.42 There will be an obligation to deliver 6 apprenticeships during the construction phase.
- 5.43 The Council will seek to secure a financial contribution of £25,812.00 to support and/or provide the training and skills needs of local residents in accessing the job opportunities created through the construction phase of all new development. This contribution will be used by the Council to provide and procure the support necessary for local people who have been out of employment and/or do not have the skills set required for the jobs created.
- 5.44 There is no requirement for end use obligations.
- 5.45 Monitoring for all obligations will be discussed and agreed with the developer prior to commencement of works.

Officer Comment:

The above obligations will be secured via condition.

LBTH Waste Policy and Development

- 5.46 The proposal is showing an area identified for refuse. It is advisable that the applicant should make use of the Local Service Plan 2031 - Waste collection standards. This will show of more specific details for refuse, recycling and compostable waste capacity with further collection information as a requirement.

LBTH Environmental Health (Air Quality)

- 5.47 The submitted report is satisfactory in terms of its conclusion regarding air quality impact on the proposed development, that the levels will be below the national air quality limit values. The report recommends that low NOx boilers will be used for heating to comply with the GLA SPG on Sustainable Design and Construction. This should be secured by conditions. Also request conditions requiring the submission of a Construction Environmental Management and Logistics Plan and details of all plant and machinery to be used in the construction phase of the development.

LBTH Environmental Health (Contaminated Land)

- 5.48 No objections to the proposal subject to conditions relating to the submission of a site investigation report, a risk assessment of the site and a remediation strategy and verification report have been submitted to for approval by the Council.

LBTH Biodiversity

- 5.49 The main building, Southern Grove Lodge, has a number of features which could support roosting bats. To avoid any potential harm to bats, works to the roof and roof voids will need to be undertaken carefully, with tiles and roof lining removed by hand, under the supervision of a licenced bat worker. Furthermore, if restoration work has not commenced by spring 2021, repeat emergence and re-entry surveys should be undertaken before work commences. This should be secured by a condition.

The Ecological Appraisal refers to holes in active use by foxes close to the southern end of the existing office building. Before any building or earthworks in this vicinity, precautions will need to be taken to ensure no foxes are trapped underground in contravention of the Wild Mammals (Protection) Act 1996.

The existing trees, shrubs and tall herbaceous vegetation could support nesting birds. Clearance should be undertaken outside the nesting season, or a survey for nesting birds undertaken before clearance.

The loss of the existing habitat on site, including scrub, grassland and ruderal vegetation, will be a very minor adverse impact on biodiversity, which can easily be mitigated in the landscaping of the development.

There is no documentation about green roofs. The proposed new building has flat roofs on three levels, two of which have photovoltaics (PVs) proposed. Biodiverse green roofs should be included, to meet both the biodiversity and living building requirements of D.ES3. Biodiverse green roofs can be combined with PVs (bio-solar roofs are now relatively mainstream), and the green roof can enhance the performance of PVs by lowering ambient temperature. Additionally, or alternatively, a biodiverse roof could be installed on the section of roof not proposed for PVs.

The proposed landscaping is generally rather formal but includes 3 species of native trees and an excellent range of good nectar plants, both of which will contribute to objectives in the Local Biodiversity Action Plan.

Other biodiversity enhancements which would be appropriate here include roosting features for bats, as recommended in the Ecological Appraisal, and nest boxes for birds such as swift and house sparrow.

The Biodiversity Officer has no objections to the proposal subject to conditions securing ecological mitigation and enhancements such as details of living roofs, bird nesting and bat roosting boxes and measures to prevent harm to bats and wild mammals.

Officer Comment:

The plans have been revised to now incorporate a living roof the full details of which will be secured by condition. All other suggested conditions will also be imposed.

LBTH Energy Efficiency

- 5.50 The energy officer is satisfied with the proposed Energy Strategy. The proposals are for a 113.7 tonnes/CO2 reduction in on-site emissions and would result in a carbon offsetting contribution of £100,890 to offset the remaining 35.4 tonnes CO2 and achieve net zero carbon. Conditions are requested securing the carbon offsetting contribution, the submission of a zero carbon futureproofing statement and a post construction energy assessment including 'as built' calculations to demonstrate the reduction in CO2 emissions have been delivered on-site.

LBTH Health Impact Assessment Officer

- 5.51 The health and infrastructure baseline have not been identified, nor has the public health profile. The use of a quality assessment framework (such as Ben Cave's review package for HIA reports of development projects) would have highlighted the need to identify the baseline in order to conduct the assessment. Each question is answered with statements and policy standards identified, but some of the responses are not detailed enough to demonstrate how the proposed development has explored possibilities to maximise health benefits on the site.
- 5.52 Healthy living: There is concern that 10 of the 36 units will fall short of the London Space place standard . Even if minor (1-2 sqm) , the HIA argues that the compromise had to done in view of heritage value of the building. Human health must be more important than heritage value, in particular as the Space place standard set the lower threshold acceptable. Confirmation is required if the 10 units falling short of the place standard are all affordable units which would affect the poorest residents.
- 5.53 Cycle parking: the proposal meets the minimum standards and is car free, reducing the historic car use of the site.
- 5.54 Open space: the proposal meets minimal standards but there is no actual detail. It would have been useful to have maps attached to the HIA to understand (even as an outline) what the plan is for open space. With open space and in particular green spaces so significant for people's mental and physical health, in particular where human density is high, HIA should be more detailed on interventions/design planned and how they integrate into the scheme as well as into the neighbourhood.
- 5.55 There is a lack of clarity as to whether the size of the open space will be reduced and by how much and also have an explanation as to why a smaller space will meet needs of the future residents? An assessment of the infrastructure baseline in the impact area would have helped appraise whether the needs of the residents are met (either on the site being developed or in the vicinity).
- 5.56 The HIA does not detail whether the new scheme will have an impact on healthcare services or on educational needs of the new resident population. This is an important aspect of a housing scheme, in particular one which delivers on affordable housing to ensure that the more deprived community has easy access to such services. The HIA refers to the issues being reviewed internally by the Council. The HIA should be able to identity future needs, based on a prediction of the future resident population (in this case, those with low disposable income who might also

experience other deprivation factors). The healthcare baseline should have been identified and the HIA could have informed the Council's internal review.

- 5.57 Overall, the development's positive outcome is to provide much needed affordable homes. However, it is difficult to evaluate how the design of the scheme will promote health, reduce health inequality. Of particular concern is that standards are not met in 10 homes and also the loss of open spaces with no details on design, aesthetics, how the scheme helps new residents integrate into the neighbourhood and access services and amenities.

Officer Comment:

The applicant has responded to the HIA Officer stating that "the provision of affordable housing does not put added pressure on healthcare services or educational provision, because these households are already residents in the borough, albeit in unsatisfactory housing, and accessing these services. In terms of the private market housing, the Council's current CIL regime would cater for any improvements that may be identified as being needed to the wider community infrastructure in the area. The site has excellent transport links, being less than 100 yards from a bus stop on the main road, and 5 minutes' walk from Mile end underground station; and is close to a local supermarkets for the purchase of fresh produce. In this latter respect, there is a Tesco Express approximately 300m-350m to the northeast on Mile End Road and Co-op approximately 325m away to the northwest and also on Mile End Road". The HIA Officer has accepted this and considers the response to be satisfactory. Matters relating to design, provision of and internal space standards are considered in the design section of this report.

LBTH Infrastructure Planning

- 5.58 No comments to make.

LBTH CIL Team

- 5.59 The proposed development would be liable for Community Infrastructure Levy (CIL) in accordance with the Tower Hamlets CIL Charging Schedule and Mayor of London's CIL2 Charging Schedule. The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.

The site is located in the borough's Zone 3 and MCIL2 charging area Band 2.

As social housing provision is expected on site, it is anticipated the landowner assumes liability for the levy and submits a claim Form 10 for social housing relief prior to commencement of development. The claimant should provide a map showing where on the site social housing will be built.

Existing building floorspace can be taken into account when calculating the CIL charge. For these buildings to qualify for demolition and/or retained credit, sufficient evidence must be provided to demonstrate lawful use of any part of the building for a prescribed period of time. Detailed floorplans must also be provided for the CIL Team to validate.

LBTH Sustainable Urban Drainage (SUDS)

- 5.60 No objections to the proposed drainage strategy provided that a condition is imposed requiring the submission of a surface water drainage scheme for the site.

External Consultees:

Metropolitan Police (Designing Out Crime Officer)

- 5.61 No objections to the proposal subject to a condition requiring the submission of details of security measures demonstrating that principles of secure by design have been included in the scheme.

Thames Water

- 5.62 No objections to the proposal subject to a condition requiring the submission of a Piling Method Statement and informatives in respect of minimising risks to public sewers, requirement for a Groundwater Risk Management Permit and matters concerning discharge to a public sewer.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

Development Plan

- 6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.

- 6.2 The adopted Development Plan comprises:

- The London Plan (March 2016)
- Tower Hamlets Local Plan 2031, "The Local Plan" (adopted January 2020)

- 6.3 The key adopted Development Plan policies relevant to the determination of this proposal are:

Land Use – LP3.3, LP3.8, LP3.9, LP4.1, LP4.2, TH D.EMP3, TH S.H1.

(Loss of Office and Housing)

Design – LP7.1, LP7.2, LP7.3, LP7.4, LP7.5, LP7.6; TH S.DH1, TH D.DH2.

(Layout, Townscape, Appearance, Public Realm, Safety)

Heritage – LP7.8; TH S.DH3.

(Historic Environment)

Housing – LP3.4, LP3.5, LP3.10, LP3.11, LP3.12, LP3.13; TH S.H1, TH D.H2, TH D.H3.

(Affordable Housing and Housing Quality)

Amenity – LP7.6; TH D.DH8.

(Privacy, Outlook, Daylight and Sunlight, Noise, Construction Impacts)

Transport – LP6.3, LP6.9, LP6.10, LP6.13; TH S.TR1, TH D.TR2, TH D.TR3, TH D.TR4.

(Sustainable Transport, Highway Safety and Capacity, Car and Cycle Parking, Servicing)

Waste – LP5.17; TH D.MW3.

(Waste Capacity and Collection)

Environment – LP5.2, LP5.3, LP5.4, LP5.5, LP5.6, LP5.7, LP5.9, LP5.10, LP5.11, LP5.13, LP5.14, LP5.18, LP5.21, LP7.14, LP7.15, LP7.19; TH S.ES1, TH D.ES2, TH D.ES3, TH D.ES4, TH D.ES5, TH D.ES6, TH D.ES7, TH D.ES8, TH D.ES9, D.ES10.

(Air Quality, Biodiversity, Contaminated Land, Energy Efficiency and Sustainability, Sustainable Drainage)

6.4 The Mayor of London's Draft New London Plan with Consolidated Suggested Changes was published in July 2019. The Examination in Public (EiP) took place in January 2019. Generally, the weight carried by the emerging policies within the Draft New London Plan is considered significant as the document has been subject to EiP, incorporates all of the Mayor's suggested changes following the EiP and an 'Intent to Publish' was made by the Mayor of London. However, some policies in the Draft New London Plan are subject to Secretary of State directions made on 13/03/2020, these policies are considered to have only limited or moderate weight. The statutory presumption still applies to the London Plan 2016 up until the moment that the new plan is adopted.

6.5 The key emerging London Plan policies relevant to the determination of this application are:

Land Use – H1, E1
(*Housing, Office Use*)

Design – D1, D3, D4, D5, D8, D11
(*Layout, Scale, Public Realm, Safety*)

Heritage – HC1
(*Historic Environment*)

Housing – H5, H6, H10, D6
(*Affordable Housing and Housing Quality*)

Transport – T5, T6, T6.1, T7
(*Car and Cycle Parking, Servicing*)

Environment – SI1, SI2, SI8, SI3, SI12, SI13,
(*Air Quality, Biodiversity, Energy Efficiency and Sustainability, Sustainable Drainage*)

Other Policies and Guidance

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

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- LP Affordable Housing and Viability SPG (2017)
- LP Draft New London Plan (2019)
- LBTH Planning Obligations SPD (2016)
- Building Research Establishment (BRE) "Site layout planning for daylight and sunlight: a guide to good practice" (2011)
- GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)

7. PLANNING ASSESSMENT

The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Quality of Accommodation
- iv. Design

- v. Landscaping and Biodiversity
- vi. Heritage
- vii. Amenity
- viii. Transport and Servicing
- ix. Environment
- x. Infrastructure Impact
- xi. Equalities and Human Rights

LAND USE

Loss of Employment

- 7.1 Policy 4.1 of the London Plan promotes the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of amongst other things; type, size and cost. Policy 4.2 of the London Plan encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility. Policy E1 of the Draft London Plan seeks to amongst other things, retain existing viable office floorspace outside of town centre locations or designated office locations.
- 7.2 Policy D.EMP3 of the Local Plan seeks to protect employment floorspace within Preferred Office Locations, Local Industrial Locations, Strategic Industrial Locations and Local Employment Locations. Outside of the above designated employment areas, development should not result in the net loss of viable employment floorspace except where they:
- a) provide evidence of active marketing over a continuous period of at least 24 months at a reasonable market rent which accords with indicative figures, or
 - b) provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use.
- 7.3 The proposal would result in the loss of employment floorspace as a result of both the demolition of the 1980's office building (3,477sqm GIA) and the conversion of Southern Grove Lodge to residential use. The Council has identified this site as being key to contributing to the delivery of new and affordable housing in the Borough. As such, no marketing evidence has been submitted with this application for its reuse for employment purposes.
- 7.4 Whilst, the proposal would result in the net loss of employment floorspace, the site has very low level of employment occupancy and in reality, the buildings on site are very much underutilised. Southern Grove Lodge has been vacant for a considerable number of years and Officers consider that the length of vacancy (13 years) and the neglectful condition of the building due to the absence of use and activity is indicative of its unviability for employment reuse. In terms of the 1980's office building, the remaining functions within the building are largely administrative with the submitted planning statement suggesting that Veolia are no longer occupying any parts of the building beyond first floor level.
- 7.5 Officers consider that there are clear planning benefits from the proposal which would outweigh the need to retain the existing employment floorspace, the majority of which has benefited from limited employment activity. These benefits include the following:

- The scheme would provide much needed new housing, contributing to achieving the Borough's housing targets.
- The scheme would deliver a high proportion of affordable housing, exceeding Local Plan and National Planning Policy requirements.
- The scheme would reactivate and bring back into use Southern Grove Lodge; a valued heritage asset in the Borough. Given the prolonged period of time the building has already been vacant, to insist upon the retention of the employment floorspace could further extend the vacancy period of this building.

7.6 The above themes are discussed in greater detail in relevant sections of this report. The applicant has also advised that the delivery of the above planning benefits is contingent on the demolition of the 1980's office building. This would allow for revenue generated from the market housing within Southern Grove Lodge to assist in offsetting the cost of demolishing the Veolia building and constructing Block A, thus enabling the amount of new homes being delivered and the level of affordable housing proposed. It would not be viable to provide any affordable housing within Southern Grove Lodge due to physical constraints of and the need to preserve the historical and heritage integrity of the building.

7.7 Officers consider that were this site and in particular the 1980's building to attract potential occupiers for employment use, there is the very real possibility that given the dated appearance of the building and the likely absence of facilities compatible with the modern day contemporary office environment; notwithstanding the absence of any supporting robust evidence with regard to the viability of bringing this site back into employment use; it would not be unreasonable to assume that it may be desirable and more cost effective to demolish and rebuild rather than retain, expand and refurbish.

7.8 This approach could also have implications in respect of other Local Plan policies and in particular, policies S.EMP1 and D.EMP2; both of which give a clear policy direction that new employment floorspace should be steered towards the Borough's designated employment locations to support, protect and enhance their role and function in London's global economy. The existing employment floorspace in this location is something of an anomaly, given the predominantly residential character of the immediate vicinity. As such, any new employment uses may generate associated activities which may not be compatible with the prevailing residential character of the area.

7.9 On balance therefore, the loss of employment floorspace is accepted and appropriately justified given the site-specific characteristics and circumstances. Officers are satisfied that there is limited, if any, reasonable prospect of the site being reused for employment purposes.

Principle of Housing

7.10 The National Planning Policy Framework (NPPF) (2019) seeks the delivery of a wide choice of quality homes which meet identified local needs, in accordance with the evidence base, and to create sustainable, inclusive, and mixed communities. Paragraph 117 specifically sends a core message to ensure that previously developed land (brownfield land) is effectively reused.

7.11 Policies 3.3, 3.5 and 3.8 of The London Plan emphasises that there is a pressing need for more homes in London and that a genuine choice of new homes should be supported which are of the highest quality and of varying sizes and tenures. Residential development should enhance the quality of local places and take account the physical context, character, density, tenure and mix of the neighbouring environment and as a minimum incorporate the space standards and more detailed requirements, as outlined in the Housing Supplementary Planning Guidance.

7.12 Policies GG2, GG4, D2, D3, D4, H1 and H10 of the Draft London Plan outlines comparable messages to the adopted London Plan with regard to the need for more and good quality homes. Draft London Plan policy H1 in particular, sets a ten-year target for net housing

completions that each Local Planning Authority should plan for. As such, the Borough is required to deliver 34,730 (3,473 per year) between 2019/20 and 2028/29.

- 7.13 At the local level, policy S.H1 of the Local Plan commits to securing the delivery of at least 58,965 new homes across the Borough (equating to at least 3,931 new homes per year) between 2016 and 2031.
- 7.14 The site has no policy designations precluding the redevelopment of the site for residential purposes and the provision of the net gain of 78 new dwellings of which 42 dwellings would be affordable would positively contribute to the Borough's housing stock, noting that there is an acute local and national demand for increased housing. The principle of housing on this site is therefore supported and considered acceptable in land use terms.

HOUSING

Housing Mix

- 7.15 Policy 3.8 of the London Plan sends an overarching strategic message that Londoners should have a genuine choice of homes that they can afford, and which meet their requirements for different sizes and types of dwellings in the highest quality environments. As such new developments should offer a range of housing choices, in terms of the mix of housing sizes and types. This message is similarly reinforced in Draft London Plan policy H10 which promotes the provision of a range of unit mix and sizes having regard to robust local evidence of need where available, to deliver mixed and inclusive neighbourhoods.
- 7.16 At the local level, policy S.H1(2) of the Tower Hamlets Local Plan states that development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through amongst other things, requiring a mix of unit sizes (including larger family homes) and tenures to meet local need on all sites providing new housing. Locally specific targets (based on the Council's most up to date Strategic Housing Market Assessment, 2017) for unit mix and sizes are set out in part 3 of policy D.H2 of the Local Plan.
- 7.17 The proposed unit and tenure mix are set out below in Table 1 as an assessment against policy D.H2.

		Market Housing			Affordable Rent			Intermediate		
Unit Size	Total Units	Units	As a %	Policy Target %	Units	As a %	Policy Target %	Units	As a %	Policy Target %
Studio	9	9	25%	/	/	/	/	/	/	/
1-bed	19	10	28%	30%	7	23%	25%	2	16%	15%
2-bed	27	13	36%	50%	9	30%	30%	5	42%	40%
3-bed	18	4	11%	20%	9	30%	30%	5	42%	45%
4-bed	5	/	/	/	5	17%	15%	/	/	/
Total	78	36	100%	100%	30	100%	100%	12	100%	100%

Table 1 – Proposed Unit and Tenure Mix against Policy D.H2.

- 7.18 With regard to the market housing mix, there would be an under provision of 2-bed (-14%) and 3-bed (-9%) units and 25% of the private housing mix includes studio flats for which there is no policy requirement across all tenures. However, as all the market housing would be contained within the converted building, Officers acknowledge that the number and mix of units have largely been informed by the physical constraints of the building and the steer given by the Council's Design and Heritage Officer during pre-application discussions to retain the existing building, minimise alterations, and the requirement to utilise the building's existing core internal physical arrangement and structures such as corridors and columns etc. Members are also advised that the number and mix of private housing in this instance are required specifically to enable the delivery of affordable housing which exceeds policy requirement. Officers therefore accept the non-compliance with the private housing mix targets set in policy D.H2.
- 7.19 With regard to the affordable rented and intermediate tenures, for the 1-bed units, there would be a marginal under provision in the affordable rent tenure (-2%) and marginal over provision in the intermediate tenure (+1%). There would be a marginal over provision of 2-bed units (+2%) and an under provision of 3-bed units (-3%) in the intermediate tenure. However, the proposal would provide for policy compliant 3-bed units (30%) and an above standard provision of 4-bed units (17% equating to an over provision of +2%) in the affordable rent tenure. Officers consider that given the Borough's pressing need for larger family homes, particularly in the affordable rent tenure, the housing mix is acceptable, and the proposal would broadly be compliant with policy, resulting in negligible deviation from the policy targets in the affordable rent and intermediate tenures.
- 7.20 The Council's Housing Team have confirmed that the proposed unit mix across each tenure would be broadly compliant with local plan policy and is therefore supported.

Affordable Housing

- 7.21 Policy 3.12 of the London Plan states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed-use schemes. However, policies H4 and H5 of the Draft London Plan seeks greater certainty in the delivery of affordable housing and sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. It is therefore expected that major developments which trigger affordable housing requirement, provides affordable housing through the threshold approach to applications.
- 7.22 Policy H5 of the Draft London Plan and The Mayor of London's Affordable Housing and Viability SPG (August 2017) sets out a 'threshold approach' to viability, whereby the approach to viability information depends on the level of affordable housing being provided. Applications for schemes that (a) meet or exceed 35% or 50% (on public land) affordable housing provision without public subsidy, (b) provide affordable housing on-site, meet the specified tenure mix, and meet other planning requirements and obligations to the satisfaction of the relevant borough and the Mayor and (c), have sought to increase the level of affordable housing beyond 35% or 50% by accessing grant are not required to submit viability information. Schemes that follow this approach are deemed to be eligible for the 'Fast Track' route and are expected to be subject to an early viability review, but this is normally only triggered if an agreed level of implementation is not made within two years of planning permission being granted.
- 7.23 Policy D.H2 of the Local Plan requires development to maximise the provision of affordable housing in accordance with a 70% affordable rent and 30% intermediate tenure split based on the number of habitable rooms.
- 7.24 The scheme provides 237 habitable rooms in total of which 149 habitable rooms would be affordable representing 63% with the remaining 88 habitable rooms being for private sale representing 37% and as such exceeds the minimum 50% provision required by Local Plan and London Plan policies. The tenure split for the affordable housing element would be 71:29 in favour of affordable rented units (106 habitable rooms) to intermediate (43 habitable rooms) and

therefore only marginally deviates from the required 70:30 split, however this is considered to be broadly acceptable. The proposal is therefore considered to be eligible for the 'Fast Track' route and thus the submission of a Financial Viability Appraisal is not required in this instance. A condition will secure that an early stage review will be triggered if an agreed level of progress on implementation is not made within 2 years of the permission being issued. The detailed affordable housing breakdown is set out below in Table 2 below.

	Tower Hamlets Living Rent Units	London Affordable Rent Units	London Living Rent	Total
Studios	0	0	0	0
1 Bed	3	4	2	11
2 Bed	4	5	5	12
3 Bed	5	4	5	14
4 Bed	3	2	0	5
Total Units	15	15	12	42
Total Habitable Rooms	56	50	43	149

Table 2: Proposed Breakdown in Affordable Housing Units

7.25 In line with policies S.H1 and D.H2 of the Local Plan, the affordable rented units would be split 50:50 between London Affordable Rent and Tower Hamlets Living Rent. The rent levels for each product would be set as follows:

London Affordable Rent (exclusive of service charges)

1bed £155.13 per week
 2bed £164.24 per week
 3bed £173.37 per week
 4bed £182.49 per week

Tower Hamlets Living Rents (inclusive of service charges)

1bed £197.18 per week
 2bed £216.90 per week
 3bed £236.62 per week
 4bed £256.33 per week

7.26 In conclusion, the affordable housing provision is welcomed and supported by Officers and the proposal is therefore considered to provide an acceptable provision of affordable housing, contributing to the Borough's much needed affordable housing stock consistent with the requirements of Local Plan and national planning policy.

QUALITY OF ACCOMMODATION

Housing Standards

7.27 The Greater London Authority's (GLA) Supplementary Planning Guidance (SPG) for Housing sets a clear priority to improve the quality of housing standards. In this regard the SPG aims to

ensure the delivery of new housing across all tenures is fit for purpose in the long term comfortable, safe, accessible, environmentally sustainable, and spacious enough to accommodate the changing needs of occupants throughout their lifetimes. As such the Housing SPG provides focused guidance and sets specific standards with regards to how places are shaped and designed including public, private and communal open space, children's play and recreation space, the design of entrances and approach to entrances, frontages to developments, accessible housing, internal and external layout, number of units per core and circulation space amongst other things.

- 7.28 At the national level, the 'Technical Housing Standards – Nationally Described Space Standard' sets the expected minimum internal space required within new dwellings, across all tenures. It sets out requirements for the gross internal area (GIA) of all new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage, and floor-to-ceiling heights.
- 7.29 London Plan policy 3.5 and Draft London Plan policy D4 seek for new housing to achieve internal space standards in line with those set at national level. Policy D4 of the Draft London Plan also sets out the importance for homes across London to be designed to a high quality. In this regard new homes should have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes.
- 7.30 Policy 3.8 of the London Plan and policy D5 of the Draft London Plan states that 90% of new build homes should meet requirement M4(2) (accessible and adaptable dwellings) of Building Regulations Approved Document M and that 10% should meet requirement M4(3) (wheelchair user dwellings).
- 7.31 The above targets are reflected at the local level by policy D.H3 of the Local Plan which seeks to ensure that all new residential units meet the minimum standards prescribed within the London Plan, with particular regard for 2.5 minimum floor to ceiling heights and the provision of 10% wheelchair housing. Policy D.H3 also requires that affordable housing should not be externally distinguishable in quality from private housing.
- 7.32 As discussed earlier, the affordable units will be separated entirely from the private for sale units. In this instance, Officers accept that this is necessary given the constraints of the site and the requirement for the private units within the converted former workhouse to be the driver for the delivery of the affordable housing units.

Block A

- 7.33 All the flats within Block A would meet or exceed the minimum gross internal floor area for the defined level of occupancy for each flat type. Private amenity space in the form of ground floor level patio areas or upper level balconies which meet the minimum requirement would also be provided. Balcony and patio areas range from between 5sqm to 54sqm with some of the wheelchair accessible units in particular benefitting from private amenity areas well above the minimum requirement.
- 7.34 Floor to ceiling heights for the flats within Block A would be 2.5 metres and the number of dwellings per core would not exceed 8 as required by Standard 12 of the Mayor of London's Housing SPG. All the units within Block A would either be dual aspect or triple aspect, providing good outlook, lighting and natural surveillance across a communal amenity area which the building semi 'wraps' around.
- 7.35 Overall, Block A is considered to provide good quality residential accommodation, providing future occupiers of the development with very good living conditions.

Block B

7.36 In terms of Block B, 12 of the 36 dwellings do not comply with the 'Technical Housing Standards - Nationally Described Space Standard' as required by the London Plan. These are set out in the table below with their reason for non-compliance.

Unit Type and Occupancy Level	Number of Units	Reason for Non-compliance	Proposed	Policy Requirement
Flat Type K - 2B4P	1	Shortfall in GIA Floor Area	68sqm	70sqm
Flat Type L - 2B4P Duplex	1	Shortfall in Floor to Ceiling Height	2.4sqm	2.5sqm
Flat Type M - 1B2P Duplex	1	Shortfall in Floor to Ceiling Height	2.4sqm	2.5sqm
Flat Types N and U - 2B3P	3	Shortfall in GIA Floor Area	59.5sqm	61sqm
Flat Type P - 1B2P	3	Shortfall in GIA Floor Area	48sqm	50sqm
Flat Type W - 2B4P	1	Shortfall in Floor Area for 1 Bedroom	10.5sqm	11.5sqm
Flat Type X - 2B3P	2	Shortfall in GIA Floor Area	60sqm	61sqm
	Total Units: 12			

Table 3: Units falling below Technical Housing Standards

7.37 In addition to the above, the development conflicts with relevant policies in Block B in terms of the following:

- Direct private amenity space would not be provided for any of the flats.
- There would be no wheelchair user dwellings (Part M4(3) of the Building Regulations).
- 4 units do not meet Part M4(2) of the Building Regulations and therefore do not provide step-free access.
- There would potentially be over 8 units being accessed from the main central core.
- 21 of the flats will be single aspect of which 7 would be north-east facing.

7.38 The compromise in housing standards is attributed to a number of factors. Underpinning this is the need to retain the former Victorian workhouse building with minimal physical internal and external alterations. Owing to the special characteristics of the building, the provision of upper level balconies would have undermined the external appearance of the building. Any ground floor amenity areas would have required new openings in the form of new doors, and this would compromise the existing fenestration arrangement and symmetry of the building. With specific reference to unit types L and M identified in the table above, Members are advised that these are duplex units incorporating the existing basement of the building and therefore has an existing ceiling height of 2.4 metres.

7.39 Internally, the building is generally constructed from load bearing masonry with timber floor and roof structures. The building has a central fairly narrow concrete corridor that spans the entire distance of the building from the northern to southern wings. There are three staircases which

exists from this corridor; one located centrally and the remaining two located in each of the wings. The proposed internal layout and flat arrangement has been informed by these existing features and structures thus resulting in more than 8 flats on each floor potentially being accessed from the main central staircase core and the absence of any wheelchair user units in Block B.

- 7.40 The four units that do not meet Part M4(2) (Accessible and Adaptable Dwellings) of the Building Regulations are located on the eastern wing at first and second floor levels. The eastern wing on these two floors sits 2.2 metres higher than the main floor levels and thus the four flats across these floors would only be accessible via stepped access. However, the Mayor of London's Housing SPG acknowledges that Part M of the Building Regulations do not generally apply to dwellings resulting from conversions or a change of use and therefore in this instance the units that are Part M4(1) compliant are accepted.
- 7.41 The applicant has also advised that the requirement to improve the thermal efficiency of the building through the use of additional insulation material, upgrade of the external walls, floors, roof and windows to significantly improve upon the building's existing u-values (the measure of a building's thermal performance) has also contributed to the shortfall in housing standards to provide better levels of insulation and reduced heating demand during the cooler months.
- 7.42 In conclusion, whilst there are shortcomings in the scheme with regards to housing standards in relation to Block B, these shortfalls are minor for each dwelling in question. The mix of accommodation within Southern Grove Lodge has been predicated by its existing form and layout which has constrained the opportunity to provide policy compliant dwellings. Officers consider that the need to preserve this heritage asset and the delivery of the high proportion of much needed affordable housing is considered to outweigh the transgressions from relevant planning policies discussed above. As these dwellings are for private sale, ultimately potential occupiers of the converted building will make a considered and deliberate choice to live in these units and as such in view of the above, it is considered that a compromise in this instance is necessary if the vacant building is to be refurbished, brought back into active use and the deliver the amount of affordable housing proposed for this development. Officers consider therefore that on balance, the proposal is acceptable.

Wheelchair Accessible Housing

- 7.43 For reasons considered earlier in the housing standards section of this report, wheelchair accessible housing would not be provided in Block B. In terms of Block A, there would be 5 wheelchair accessible units which equates to 6% of the total provision of dwellings across the scheme and as such falls below the minimum 10% as required by London Plan policy 3.8.
- 7.44 However, proportionately compared to the number of total units within Block A (42 units) only, the provision would equate to 12% within Block A. All of the wheelchair accessible units are generous in size (ranging between 86sqm to 118sqm in GIA) and designed to accommodate occupancy levels of at least 4 persons for which there is a pressing need for. As such the proposed wheelchair accessible provision is considered to be acceptable. A condition on the planning permission will secure the delivery of the wheelchair accessible units.

Private and Communal Amenity Space and Children's Play Space

Private Amenity Space

- 7.45 Policy D.H3 of the Local Plan requires that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. Balconies and other private external spaces should have a minimum width and depth of 1500mm.

7.46 For reasons set out earlier in this report, there would be no private amenity space provided for the dwellings within Block B.

7.47 In terms of Block A, all the dwellings would provide private amenity space in the form of either ground level patio areas or upper level balconies in accordance with the minimum space standards required by Local Plan and London Plan policies and the Housing SPG.

Communal Amenity Space

7.48 Policy D.H3 (Part C) of the Local Plan requires that for major developments (10 residential units or more) communal amenity space should be provided. The provision should be calculated based on 50sqm for the first 10 units with an additional 1sqm for every additional unit thereafter. The proposal is therefore required to provide 118sqm of communal amenity space.

7.49 The scheme provides 275sqm of communal amenity space which substantially exceeds the minimum requirement. There will be a central ‘courtyard’ communal area measuring 135sqm which the building form of Block A wraps around. The ‘courtyard’ area would be well overlooked with opportunities for direct and passive surveillance. Three smaller areas equating to a total provision of 140sqm are also proposed towards the north-eastern part of the site and between the eastern flanks of both buildings and the rear boundary of the terraced houses along Brokesley Street.

7.50 The communal areas located along the north-eastern boundary would not achieve the same level of surveillance. However, in light of the physical constraints of the site, the offering of communal amenity provision in excess of the minimum requirement and the absence of any private amenity provision for the flats in Block B, Officers consider that on balance that the communal amenity area in this location is acceptable. The detailed design elements of the communal amenity areas would be secured via the imposition of a suitable condition.

Children’s Play Space

7.51 Policy 3.6 of the London Plan seeks to ensure that development proposals that include housing make provision for good quality accessible play and informal recreation provision for all ages taking into account the projected child population generated from the scheme. The Mayor’s Supplementary Planning Guidance Providing for Children and Young People’s Play and Recreation sets out guidance to assist in this process. This is similarly emphasised in Draft London Plan policy S4.

7.52 At the local level, policy D.H3 of the Local Plan requires major developments to provide a minimum of 10sqm of high-quality play space for each child. The Tower Hamlet’s child yield calculator should be used to determine child numbers in a development. The child yield and required associated children’s play for the development is set out in the table below:

Age Group	Child Yield	Area Required (sqm)	Area Proposed (sqm)
Aged 0-4	20	199	199
Aged 5-11	17	170	170
Aged 12-18	18	182	190
Total	55 Children	550	559

Table 4: Child Yield and Required Play Provision.

7.53 The development will meet the minimum children’s play provision and marginally exceed this by 9sqm. The areas of play are largely located on the south-western corner of the site, between Southern Grove and in front of Southern Grove Lodge and essentially forming the foreground to the converted building. Some of the play provision (50sqm) would also be located in the north-eastern corner of the site near the smaller communal amenity areas and again site constraints

have informed the need to locate some of the play provision away from the largely open and overlooked areas. It should be noted however, that the smaller play provision would be dedicated to older children aged 12-18 years and as the overall provision of play would exceed policy requirement, Officers consider that on balance the play strategy is acceptable. The detailed elements of the play areas would be secured via the imposition of a suitable condition.

Daylight and Sunlight for Proposed New Development

- 7.54 Policy D.DH8 of the Local Plan seeks to ensure that amongst other things, adequate levels of daylight and sunlight for new residential developments, including amenity spaces within the development are achieved. The relevant guidance for assessing daylight and sunlight levels is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011). The primary method of assessment of new build accommodation is through calculating the average daylight factor (ADF) and No Sky Line (NSL).
- 7.55 BRE guidance specifies ADF target levels of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. Modern developments within urban locations typically contain combined kitchen/diners or a combination of kitchen/diner/living room areas. The principle use of a room designed in such a manner is as a living room and accordingly it would be reasonable to apply a target of 1.5% to such rooms. This approach is accepted by the BRE guidelines provided that kitchens are directly linked to a well-lit space.
- 7.56 Members are advised that a new UK adopted European Standard for assessing daylight within buildings was published in 2018; BS EN 17037:2018: Daylight in Buildings. The new standard replaced BS 8206-2:2008 which is referenced in the BRE guidance. Until such a time the BRE guidance is updated to reflect the new standard, there is common understanding that both standards can be used to calculate daylight provision within new dwellings. Under the new standard, there are 2 assessment methods that can be used to calculate daylight; target daylight factor or target illuminance. For the purpose of this application target illuminance has been adopted which recommends that target illuminance dependant on room use be achieved over 50% of a room area for 50% of daylight hours. The target illuminances are 100lx for a bedroom, 150lx for a living room and 200lx for a kitchen. Where one room serves more than a single purpose, the target illuminance is that for the room type with the highest value.
- 7.57 With regard to assessment of sunlight, the BRE guidance states that in general, a dwelling which has a particular requirement for sunlight will appear reasonably sunlit if at least one main window faces within 90 degrees due south and the centre of one window to a main living room can receive 25% annual probable sunlight hours (APSH), including at least 5% annual probable sunlight hours in the winter months (WPSH) between 21 September and 21 March.
- 7.58 Where sunlight levels fall below the suggested level, a comparison with the existing condition is reviewed and if the ratio reduction is within 0.8 (equivalent to a 20% reduction) of its former value or the reduction in sunlight received over the whole year is 4% or less, then the sunlight loss will not be noticeable. It is also important to note that BRE guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. The guidelines further state that kitchens and bedrooms are less important in the context of considering sunlight, although care should be taken not to block too much sun.
- 7.59 The applicant has submitted 2 Daylight/Sunlight reports which have been produced by Avison Young. The first report assesses daylight and sunlight within the development based on the BRE guidance. The second report assesses daylight within the scheme using the new standard BS EN 17037:2018. A further 2 addendum letters provides results for 6 bedrooms at mezzanine level within Southern Grove Lodge that were originally discounted due to the assumption that they relied on artificial lighting, when in fact they do benefit from natural light

and an assessment of overshadowing of the amenity areas. All the assessments have been reviewed independently by Delva Patman Redler.

Assessment of Daylight/Sunlight against BRE Guidance

58-60 Southern Grove – Block A

- 7.60 In relation to daylight, the ADF analysis demonstrates that 154 of the 165 rooms tested (93.3%) would comply with the BRE guidelines. Of the 11 rooms that fall short, 9 are bedroom windows of which 6 rooms look into the internal courtyard and are located beneath an overhanging balcony/walkway and so by design of the building access to daylight is limited and the remaining 3 are also similarly restricted by recessed and overhanging balconies. The ADF values for these bedrooms range between 0.14% to 0.77% where the ADF target level is 1%. It is acknowledged however, that as bedrooms, the BRE guidance sets a naturally lower expectation for daylight and the main living spaces within these units would all receive good levels of daylight.
- 7.61 The other 2 rooms that fall short relate to kitchens which have an ADF value of 1.68% and 1.85% respectively against the ADF target of 2% for kitchens. The kitchens in question are small galley kitchens rather than large traditional family kitchens with seating and as such they are functional spaces rather than main habitable rooms. The assessment identifies that whilst these rooms do not achieve their target of 2%, they are well-lit given their functional use. The rooms also satisfy the NSL test and achieve daylight to at least 85% of the room.
- 7.62 In terms of the NSL analysis, the results demonstrate that 128 rooms of the 165 rooms tested (78%) would comply with the BRE guidelines whereby direct daylight at worktop height (850mm from finished floor level) would be distributed to at least 80% of each room in question. The 9 bedrooms that failed to meet the ADF mentioned above are included in the rooms that fall short and these bedrooms achieve NSL values of between 6.71% and 36.96%. Where other rooms do not meet the guidelines, they are generally obstructed by overhanging balconies/walkways.
- 7.63 It should be noted however, that of the 37 rooms that fall below the NSL target, 23 would achieve direct sky visibility to within 50-79% and this is considered to be reasonable for an urban location. Moreover, 28 of the 37 rooms are bedrooms which have a lower expectation for daylight.
- 7.64 In relation to sunlight, 88 applicable rooms within Block A are located within 90° due south and 57 rooms (65%) would comply with the BRE guidelines and have at least 1 window achieving 25% APSH. 22 of the 31 rooms that do not meet the guidelines are bedrooms, which have a lower requirement for sunlight. The remaining 9 rooms include 5 kitchen/diners and 4 living rooms, however where the recommended standard is not met in these rooms it would be in the other main living space within the relevant unit. 75 rooms would meet the guidelines for winter sun with 12 of the 13 rooms that do not meet the guidelines being bedrooms which have a lower requirement for sunlight with the remaining 1 room being a living room.

Southern Grove Lodge – Block B

- 7.65 With regard to Southern Grove Lodge, the ADF analysis demonstrates that 92 of the 93 rooms tested (98%) would comply with the BRE guidelines. The room that falls below standard is a bedroom located on the mezzanine level and would achieve an ADF value of 0.46% and thus has a lower expectation of daylight. However, it should be noted that this room would achieve an NSL value of 97.74% and is only served by 1 window.
- 7.66 In terms of NSL analysis, the assessment demonstrates that 91 of the 93 rooms tested (98%) would comply with the BRE guidelines. The 2 rooms that fall below the target level are bedrooms located at basement level where access of daylight is restricted by lightwells.

- 7.67 In relation to sunlight, 60 applicable rooms have been tested and of these, 52 (87%) would comply with the BRE guidelines and have at least 1 window achieving 25% APSH. 7 of the 8 rooms that do not meet the guidelines are bedrooms which have a lower requirement for sunlight. The remaining room is a living room/diner which falls short of the recommended target at 20% APSH. However, the adjacent kitchen which serves the unit would meet the guidelines. 57 rooms (95%) would meet the guidelines for winter sun, with the 3 rooms that fail all being bedrooms; 2 of which are basement level rooms and the remainder at first floor level.

Assessment of Daylight Results against Target Illuminance (New Standard: BS EN 17037:2018)

58-60 Southern Grove – Block A

- 7.68 In relation to Block A, of the 165 rooms tested, 139 rooms (84%) would meet their target illuminance value. Of the 26 rooms that fail to achieve their target values, 6 relate to combined Living/Kitchen/Diners (L/K/Ds). Three of these L/K/Ds achieve just below 50% of the room area lit to 200lx, ranging between 41.6% to 49.3% with the remainder achieving areas of 23.8% to 30%. The submitted assessment highlights that the primary uses for these rooms are the living/dining spaces which have a target of 150lx. Therefore, if this target was applied to reflect the primary use of these rooms, the percentage areas achieving the target would be higher.
- 7.69 Three kitchen/dining rooms fall short of 50% of the area lit to 200lx, ranging between 36.6% to 48.0%, 3 living/dining rooms achieve values ranging between 41.2% to 45% and 2 small kitchens achieve lux values of 24.4% and 33.35% of the area for 50% of the time. The assessment confirms that the majority of these rooms will achieve 200lx to large areas of the room and only marginally falls below the 50% target time and therefore target illuminance is achieved for significant parts of the day. 12 bedrooms will also fall short of achieving 50% of the room area lit to 100lx for 50% of the available hours, however as previously highlighted, bedrooms are given less importance in the room hierarchy in the BRE guidelines. Generally speaking, the rooms that fall below are those located underneath overhanging balconies/walkways which hinder access of daylight.

Southern Grove Lodge – Block B

- 7.70 In relation to Block B, of the 93 rooms tested, 77 (83%) meet their target illuminance value. Of the 16 rooms that fall short, 5 relate to L/K/D of which 2 marginally fall short of achieving 50% of the area lit to 200lx at 44.0% and 47.5% with the remainder achieving levels ranging between 25.4% to 35% of the area. However, as per Block A the assessment highlights that the primary uses for these rooms are the living/dining spaces and therefore if the target of 1.5lx was applied the percentage areas achieving the target would be higher.
- 7.71 One kitchen falls short of the target of 200lx achieving 33% of the area lit, however the assessment considers that this kitchen should not be considered as a 'habitable' space. The kitchen in question measures 9sqm and has no seating capacity. 7 studio rooms will be below the target value of 200lx for the prescribed period of time, however 4 of these rooms achieve at least 44% of the room area. The assessment applies the same rationale as L/K/D rooms and considers that a target of 150lx is more appropriate thus if this target was applied, a greater number of rooms would achieve the 50% area threshold. The remaining rooms that do not comply would be bedrooms and considered to be "less important" by the BRE guidelines.

Assessment of Sunlight/Overshadowing to Amenity Areas

- 7.72 The assessment of sunlight and overshadowing to the amenity areas within the development has been undertaken in accordance with the BRE guideline '2 hours sun on ground' test , on 21

March (Equinox). The BRE guidelines recommend that at least 50% of the amenity area should receive at least 2 hours of sunlight on 21 March.

- 7.73 The assessment identifies 8 amenity areas (figure 5 below) denoted as Areas 01 to 08 with Areas 01,03,04 and 08 comprising general amenity spaces, Areas 02 and 07 forming designated amenity space for 12-18 year olds, Area 05 comprises amenity space for 0-4 year olds and Area 06 comprises amenity space for 5-11 year olds.
- 7.74 The sunlight assessment demonstrates that with the exception of Area 04 all the spaces will far exceed the BRE recommendation of 50% sunlit, with all achieving in excess of 90% sunlit.
- 7.75 Area 04 falls below the BRE recommended guidelines with only 2.82% sunlight for 2 hours on 21 March. The assessment considers however that as this space represents one of four accessible amenity spaces designated for the same use that it would be reasonable to consider the sunlight available to these four spaces combined.
- 7.76 The total area for Areas 01, 03, 04 and 08 is 275sqm and 224sqm (81.5%) of this combined area will receive 2 hours of sunlight on 21 March and therefore the assessment concludes that when considered holistically, the general amenity spaces combined satisfies the BRE recommendations.
- 7.77 Delva Patman Redler are in general agreement with the conclusions drawn and do not consider that the assessment of Area 04 in combination with the general amenity areas 01,03 and 08 are unreasonable. Overall, it is considered that the amenity areas would provide good levels of sunlight to residents of the development.

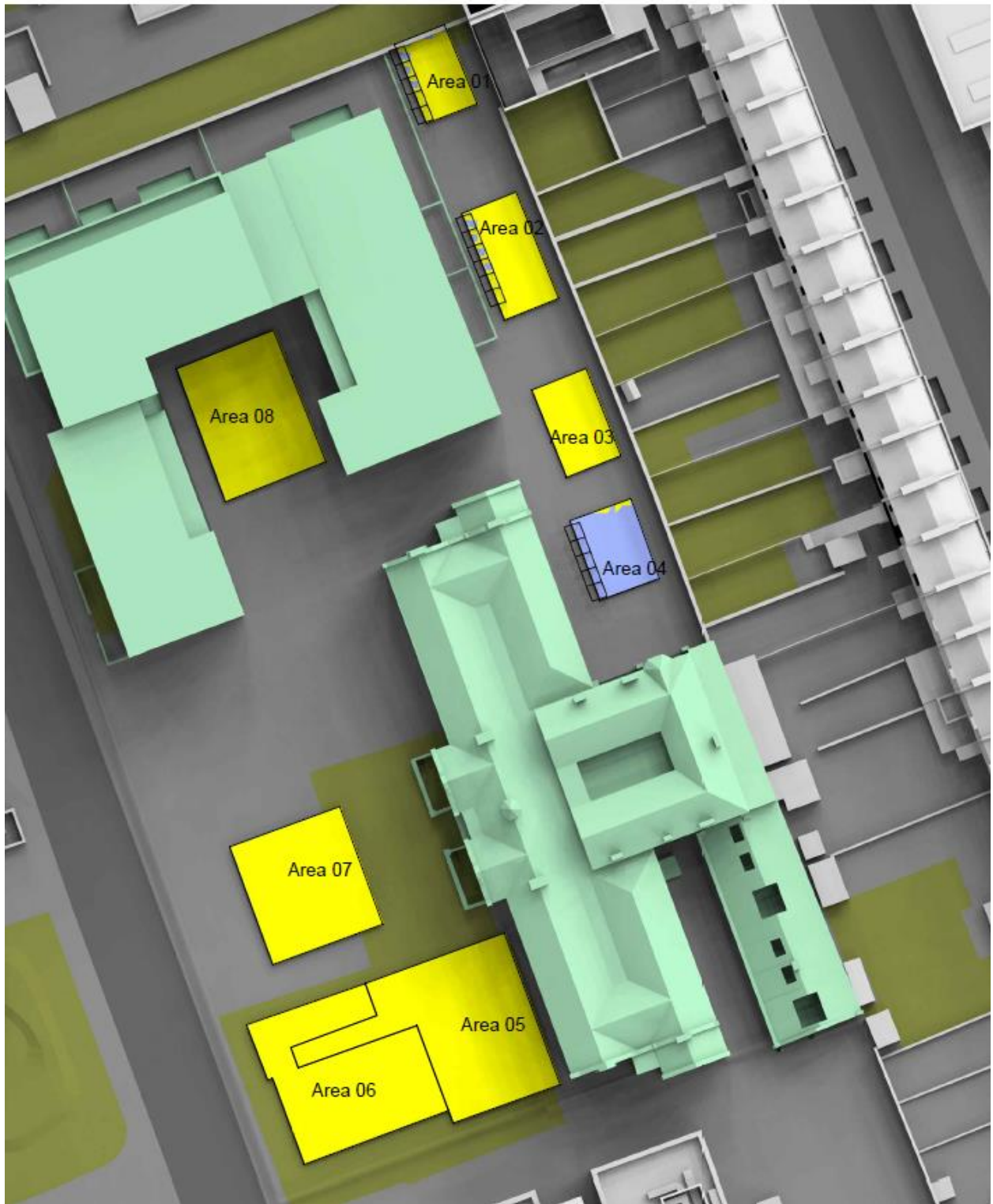


Figure 5: Assessment of Sunlight over Amenity Areas.

Conclusion on Daylight/Sunlight for Proposed Development

- 7.78 In conclusion, the development is considered to provide good levels of daylight and sunlight to both buildings and good levels of sunlight to the amenity areas. The proposed daylight results demonstrate that the new dwellings would receive good levels of daylight that are commensurate with an urban location such as this and are therefore considered acceptable.
- 7.79 In terms of sunlight received to the proposed dwellings, despite the transgressions all units within both buildings would receive adequate sunlight to at least 1 main living space and therefore sunlight provision is considered acceptable.
- 7.80 The submitted daylight/sunlight assessment has been independently reviewed by Delva Patman Redler and there have been no concerns raised to dispute the findings of the submitted daylight/sunlight assessment. Where transgressions have been justified in the assessment, Delva Patman Redler considers them to be fair and accepted under the BRE guidance.

DESIGN

- 7.81 The NPPF, policies 3.5, 7.1, 7.4, 7.5 and 7.6 of the London Plan and policies D1, D2, D3, D4 and D7 of the Draft London Plan emphasises the expectation for high-quality design in all developments.
- 7.82 Specifically, policy 7.4 of the London Plan requires development to have regard to the form, function and structure of the local context, scale, mass and orientation of surrounding buildings. It is also required that in areas of poor or ill-defined character, that new development should build on the positive elements that can contribute to establishing an enhanced character for future function of the area. Policy D1 of the Draft London Plan reiterates these objectives.
- 7.83 At the local level, policy S.DH1 of the Local Plan echoes strategic objectives and requires developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. To this end, amongst other things, development must be of an appropriate scale, height, mass, bulk and form in its site and context. Policy D.DH2 of the Local Plan requires developments to contribute to improving and enhancing connectivity, permeability and legibility across the Borough. Local Plan policy S.DH3 seeks to preserve or, where appropriate, enhance the Borough's heritage assets in a manner appropriate to their significance.

Density

- 7.84 The NPPF emphasises the importance of delivering a wide choice of high-quality homes and, as part of significantly boosting the supply of housing, advises that Local Planning Authorities should set their own approach to housing density to reflect local circumstances.
- 7.85 Policy 3.4 of the London Plan sets out a density matrix as a guide to assist in judging the impacts of a scheme. It is based on the setting and public transport accessibility level (as measured by TfL) of the site. Whilst the policy guides Local Planning Authorities to resist proposals which compromise the policy, the policy also states that it is not appropriate to apply the matrix mechanistically.
- 7.86 Unlike the adopted London Plan, there is no density matrix in the Draft London Plan. Instead, Policy D3 of the Draft London Plan seeks to ensure that development proposals make the most efficient use of land and states that sites must be developed at the optimum density, with a design-led approach to optimising density.
- 7.87 Policy D.DH7 of the Local Plan requires that where residential development exceeds the density set out in the London Plan, it must demonstrate that the cumulative impacts have been considered (including its potential to compromise the ability of neighbouring sites to optimise densities) and any negative impacts can be mitigated as far as possible.

- 7.88 Based on the characteristics of the site, the density matrix in the London Plan identifies the site as being appropriate to provide 200-700 habitable rooms per hectare (hr/ha) or 55-225 units per hectare (u/ha). The proposal would have a density of 478 hr/ha or 156 u/ha and therefore comfortably sits within the appropriate density range. This density is as expected given the heritage constraints of the site which have informed the design proposals. This is discussed in greater detail in the design and heritage sections of this report.

Height, Scale, Massing and Layout

- 7.89 The proposed site layout has been informed by the need to retain Southern Grove Lodge and as such the broad location of buildings on the site would loosely replicate the existing arrangement with new building (Block A) sited directly to the north-west of the retained Victorian former workhouse. The proposed site layout is established on the key principles of providing an open site with generous shared landscaped areas in front of Southern Grove Lodge, a courtyard in front of Block A and general landscaping within the remaining spaces between the two buildings. Access paths are also incorporated within the site boundary layout.
- 7.90 The courtyard by Block A and the landscaped area in front of Southern Grove Lodge will incorporate children's play space provision as discussed earlier in this report. Along the eastern boundary, provision of communal amenity space and children's play would be provided for the sole use of residents of the development. 5 blue-badge spaces are proposed to be provided directly north of the landscaped area fronting Southern Grove Lodge.
- 7.91 In terms of Block A, the building composition consists of two elements. The first being three 'L'-shaped blocks which connect together to form an enclosure around the new courtyard. The longest elevations of each block will front Southern Grove to the west, the rear of Tracy House to the north and the rear gardens of dwellings in Brokesley Street to the east. The blocks fronting Southern Grove and facing the rear of Tracy House would be 5-storey whilst the block facing towards Brokesley street would be 4-storey.
- 7.92 The second element is an additional prominent set-back storey on the north-western corner of the building. The building height therefore will range between 4-6 storey resulting in a stepped and varied roof line. The overall height of the new building will reach 20.22 metres (31,675 AOD) to parapet level.
- 7.93 In terms of Southern Grove Lodge, there are no extensions or fundamental structural alterations proposed to increase the scale, form or massing of this building.
- 7.94 The height, scale, massing and layout principles of the development are generally supported by Officers and represent a considered approach which ensures that the two buildings sit well in relation to each other, without the new building undermining the presence of Southern Grove Lodge; an important heritage asset. Notably, the layout arrangement would enhance the appearance of Southern Grove Lodge in the street scene. This is further discussed in more detail in the heritage section of this report.
- 7.95 Within the wider context there are examples of buildings of comparable height predominantly ranging between 4-6 storeys. Tracy House, Buttermere House and Coniston House; all 4-storey buildings and Derwent House at 6-storey are immediate points of reference. Members are reminded that Buttermere House, Coniston House and Derwent House have planning permission to increase the height of these buildings by an extra 2-storeys.
- 7.96 Overall, it is considered that height, scale and massing and layout of the proposal would be acceptable subject to the proposal providing a quality detailed design response that would be appropriate its location.

Appearance and Materials

Southern Grove Lodge

7.97 As previously highlighted, no extensions are proposed to Southern Grove Lodge and there would be limited change to the external fabric of the building. Externally, the building is characterised by a strong grid pattern made up through a symmetrical fenestration arrangement, inset bays, brick detailing and variation in brick types and colour. The principle elevation fronting Southern Grove is the most symmetrical elevation save for where the existing office building physically connects to the building. Alterations proposed as part of the refurbishment works to Southern Grove Lodge will consist of the following:

- Roof will be fully replaced due to its poor condition. However, existing roof slates will be retained where possible.
- Replacement of decorative vents and existing rooflights over secondary staircases with contemporary methods of ventilation.
- Replacement of lantern rooflight over the existing kitchen extension with lantern rooflights of similar style and detail. These new rooflights will be located within the replacement roof to coordinate with the proposed new internal layout.
- All windows and doors will be replaced with double glazed timber and painted dark grey to correspond with windows in the new building.
- The ground floor façade on the left hand side of the west elevation where the existing office building joins will be fully restored with matching brickwork and detailing of the matching bays on the right hand side of the main entrance.
- Brickwork to be washed and cleaned.

7.98 The retention of existing roof slates where possible is supported and where this cannot be achieved, a condition will secure that new roof slates will be of a specification to be a close match to the existing. The Heritage Statement acknowledges that whilst the rooflights are of little value, the removal of the decorative vents across the building will lead to a degree of harm to the significance of the heritage asset through the loss of an original decorative element. However, the Heritage Statement considers that the broader architectural integrity of the austere Victorian design is maintained, and the loss of the original vent features is balanced against the heritage-specific benefits of bringing the conversion forward.



Figure 6: Photo of Decorative Vents and Rooflights.

- 7.99 In terms of the replacement of windows and doors, the Heritage Statement considers that this would enhance the architectural significance of the site and create a more uniform and holistic appearance. The use of a darker colour and tones for windows and doors would reflect the more austere aspects of the building's history yet incorporate modern design to the building which reflects contemporary residential accommodation.
- 7.100 The alterations and refurbishment work proposed to Southern Grove Lodge are supported and welcomed by Officers and are considered to be a respectful and sensitive response which would successfully reactivate this distinctive building of historical significance.

58-60 Southern Grove – Block A

- 7.101 With regard to Block A, the design and appearance of the building will be contemporary and modern with the core material comprising two brick tones for each of the three 'L'-shaped blocks which form the building. A lighter brick is intended to be the principle brick to reflect the light tones of London Stock brick used in the local area whilst the second darker brick seeks to draw upon the darker tones of the Victorian workhouse building. At ground floor level it is proposed to alternate the two brick types between courses to provide a subtle plinth feel to the building.



Figure 7: Proposed Elevation Detail of Block A from Southern Grove.



Figure 8: Proposed Block A Elevation Detail in Context when Viewed from Southern Grove.

- 7.102 The palette of materials includes the use of rainscreen cladding arranged in a vertical pattern in a red-brown colour thus providing a contrast to and demarcation between the three core blocks. The same rainscreen cladding is intended to be used for the recessed 6th floor element and the decking access on the courtyard facing elevations of the northern and western blocks.
- 7.103 The building incorporates a varied fenestration arrangement with windows and inset balconies articulated with recesses and inset brickwork. The building seeks to adopt the strong grid pattern of the Victorian workhouse through the rhythm and regularity of the fenestration arrangement and configurations of openings and recesses. The northern elevation of the building facing Tracy House will incorporate projecting balconies which are simplistic in design, comprising powder coated metal vertical bar balustrade railings. The same balustrade will be used for the recessed balconies. The new building will be sited closer to Southern Grove than the existing building, thus activating the frontage along Southern Grove and this is welcomed by Officers.

Proposed materials (clockwise from top left):
 main brickwork; warm-toned zinc; RAL 3007 aluminium windows
 within zinc clad areas; RAL 7011 aluminium windows within brick
 clad areas; brick used as alternate courses at ground floor.



Figure 9: Proposed Palette of Materials for Block A.

- 7.104 Overall, Officers consider the proposed materiality of the proposed building would be acceptable and the design and appearance of Block A would make for a complementary modern contrast to the adjacent Victorian building. The proposal would accord with design policies contained both within the Local Plan and London Plan.

Safety and Security

- 7.105 The reactivation of the street frontage of the site along Southern Grove will enhance safety and security within the locality. The design and layout of the development within the site boundary will provide opportunities for passive surveillance on the ground and from the buildings. The majority of the amenity and play areas will be accessible by members of the public however the smaller areas of children's play and amenity space along the eastern boundary will be gated. Whilst Officers do not usually support the provision of gated amenity areas, in this instance the areas in question are towards the rear of the site and fairly tucked away. As such there is limited opportunity for natural surveillance and therefore it is considered that in this instance the provision of a gate for this area would be justified.
- 7.106 No objections to the proposal have been received from the Metropolitan Police: Designing Out Crime Officer and a condition will be imposed ensuring that the development is designed to Secure by Design standards and achieves accreditation.

Design Conclusions

- 7.107 In conclusion, Officers consider that the development is a considered and appropriate design response providing a new building of suitable mass and scale for the site's location yet respects the setting of the non-designated heritage asset and the Conservation Area.
- 7.108 The appearance of the development and the proposed palette of materials for both buildings would be of a good design quality which would provide a positive contribution in the street scene and the context of the surrounding area.

LANDSCAPING AND BIODIVERSITY

- 7.109 Policy 5.10 of the London Plan and policy G1 of the Draft London Plan expects development proposals to integrate green infrastructure from the offset in the design process to contribute to urban greening.
- 7.110 Policy 7.19 of the London Plan and policy G6 of the Draft London Plan require new developments to make a positive contribution to the protection, enhancement, creation and management of biodiversity wherever possible.
- 7.111 At the local level, policy D.DH2 of the Local Plan promotes the use of using high quality paving slabs, bricks and pavers for footways, parking spaces and local streets to create attractive, accessible, comfortable and useable development. Soft landscaping should be maximised to soften the streetscape and provide visual and environmental relief from hard landscaping, buildings and traffic. Policy D.ES3 of the Local Plan seeks to protect and enhance biodiversity in developments by ensuring that new developments maximise the opportunity for biodiversity enhancements, proportionate to the development proposed.
- 7.112 The site in its current format is very much a story of "two halves" with the frontage to Southern Grove Lodge providing a spacious and open feel which is enhanced by the existing soft landscaping and the 2 protected trees directly in front of the building albeit, this part of the site is currently enclosed by hoardings. In contrast, the existing office building and the surrounding hardstanding area for associated car park is quite stark and crude which is exacerbated by the limited and sparse planting along the western boundary fronting Southern Grove.
- 7.113 The initial landscaping strategy proposed for the site seeks to deliver coherent useable spaces that provides well defined circulation routes which clearly separates pedestrian and vehicular movement. There would be legible connectivity between the communal and children's play space fronting Southern Grove Lodge and the wider areas of communal amenity space deeper

within the site. The strategy would cohesively and holistically connect the two parts of the site together and this is welcomed by Officers.

- 7.114 In terms of hard landscaping, the strategy would consist of block paving to parking bays, paving to communal courtyard areas and external spaces, slab paving to patio areas, resin bound gravel forming part of the children's play area and Bitmac surfacing for the vehicular access route. The use of furniture will include timber cube seats, timber seating, raised planters with integral seating to the courtyard space, timber natural play elements, boulders and natural play elements. The hard landscaping proposals will clearly be a marked improvement from the current status.
- 7.115 There would be a notable improvement in soft landscaping with the introduction of new hedges; along the northern boundary and at various points within the site, planter beds, grassed areas and areas of rain garden planting mix thus incorporating principles of sustainable drainage into the strategy.
- 7.116 The soft landscaping strategy will incorporate the provision of 36 new trees of which 26 will comprise native species; Field Maple, Common Alder and Whitebeam planted at 18-20cm girth (extra heavy standard). The remaining trees planted will be smaller trees commonly known as the Juneberry. 9 Field Maples will be planted along the western boundary of the site fronting Southern Grove thus creating a tree-lined boundary on the most public facing and visible boundary of the site. 5 Common Alders will be planted along the eastern boundary of the site thus assisting in softening the visual appearance of the development when viewed from the dwellings in Brokesley Street. For Member information, trees planted at 18-20 cm girth tend to grow to an average height of 4-5 metres. The two protected trees (London Plane and Black Locust) in front of Southern Grove Lodge will also be retained as part of the proposals.
- 7.117 The scheme will also include other biodiversity and ecological enhancements in the form of a Bauder biosolar green roof on the roof of the block fronting Southern Grove. For Member information, a biosolar green roof is an integrated mounting solution that allows living roofs and PV panels to occupy the same area of roof space with the front edge of the PV panels set at around 300mm above the level of the substrate thus allowing for liberal growing room for the vegetation.
- 7.118 The submitted ecological appraisal has identified that the scheme could enhance opportunities for bird nesting and bat roosting, and this is supported by Officers and will be secured via condition.
- 7.119 Officers welcome the robust landscaping, ecological and biodiversity enhancements proposed for the site. The site currently has low ecological value and its biodiversity will be greatly enhanced through the proposed tree planting and landscaping. The Council's Biodiversity Officer supports the initial landscaping strategy and confirms that an excellent range of nectar planting would be provided, and the ecological mitigation and enhancements are supported. Full details of landscaping proposals including details of living roofs, bird nesting and bat roosting boxes will be secured via condition.
- 7.120 Overall, the proposal is considered to be compliant with Local Plan and national planning policies with regard to matters concerning landscaping and biodiversity.

HERITAGE

- 7.121 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a general duty in the exercise of planning functions, with respect to any buildings or other land in a Conservation Area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- 7.122 Paragraphs 193 of the NPPF similarly emphasises that great weight should be given to the conservation of designated heritage assets. This is irrespective of whether any potential harm

amounts to substantial harm, total loss or less than substantial harm to its significance. Similarly paragraphs 194-198 of the NPPF sends comparable messages, however emphasises that where a proposed development will lead to specifically substantial harm to (or total loss of significance of) a designated heritage asset, Local Planning Authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

- 7.123 Policies 7.8 and 7.9 of the London Plan seek to ensure that heritage assets are identified, valued, conserved, restored and re-used where appropriate to play a positive role in place shaping. This is echoed by policy HC1 of the Draft London Plan.
- 7.124 At the local level in policy S.DH3 of the Local Plan requires proposals to alter, extend or change the use of a heritage asset or proposals that would affect the setting of a heritage asset will only be permitted where amongst other things, they safeguard the significance of the heritage asset, including its setting, character, fabric or identity and they enhance or better reveal the significance of assets or their settings.
- 7.125 As highlighted earlier Southern Grove Lodge is a non-designated heritage asset and whilst the application site in its entirety does not sit within The Tower Hamlets Conservation Area, the Victorian building and the eastern boundary of the site are included.
- 7.126 The closest listed buildings and structures to the site are the Grade II listed buildings of the former St Clements Hospital site to the north-east and the Grade II boundary wall, gates and gate piers of the Tower Hamlets Cemetery to the south of the application site and abuts the southern boundary of the Beatrice Tate school.
- 7.127 The Tower Hamlets Cemetery Conservation Area Character Appraisal identifies that the area *“was designated in November 1987 and is centred around the Victorian cemetery park in Bow. Bounded by Mile End Road to the north, the Conservation Area borders on the British Estate (built to replace the terraced row houses cleared in the 1970s) and includes the surviving residential townscapes of Brokesley Street and Mornington Grove, the St Clements Hospital site and Wellington Primary School”*.
- 7.128 The application has been accompanied by a Heritage Statement prepared by the Heritage Collective. The Heritage Statement identifies that the Conservation Area derives its heritage interest from a combination of factors including:
- the 19th century expansion and evolution of Mile End and Bow which draws together illustrative examples of Victorian public institutional architecture, transport infrastructure and a purpose-designed cemetery and,
 - the legacy from three highly significant developments of the Victorian period; namely the evolution of advancements in technical engineering (i.e. for the underground), the necessary provisions of public amenities to cope with the rapidly expanding industrial-era population and the specific focus on the broader public developments of the 19th century evolution enhanced and complemented by the construction of associated new housing.
- 7.129 Whilst the built form of the Conservation Area is influenced primarily by popular Victorian classical revival styles, the Heritage Statement emphasises that the application of this approach varies across the Conservation Area for example, the ornate Italianate design of the Bow Road Infirmary (later St Clements Hospital) contrasts with the more austere styling of Southern Grove Lodge. Similarly, the houses of Mornington Grove are grander than the smaller, but characterful and well-articulated terraces of Brokesley Street.
- 7.130 In consideration of the Conservation Area, the Heritage Statement suggests that the contribution of its setting is greater in some parts than others given key areas have undergone extensive post-war redevelopment. In particular reference to Southern Grove, the Heritage

Statement reflects on the fact that Southern Grove has seen almost a wholesale erosion of its 19th century streetscape with the primary remnants being the former workhouse and the boundaries of the cemetery with Southern Grove predominantly comprising of buildings which are 20th century in character with the visibility of the former workhouse significantly reduced by the presence of buildings of greater visual mass.

- 7.131 In terms of the former workhouse specifically, the historical significance of this building reflects the harder attitudes towards social welfare provision that developed through Victorian utilitarian ideals where workhouses adopted strict and harsh regimes. Typically, the internal layout of such buildings was standardised revolving around a plan with wings emanating from a central hub to allow for segregation by gender for example, which were reflective of Victorian utilitarian ideals. The common plan for the mid-19th century workhouses was an entrance range, the main building and an infirmary; this was known as a the 'corridor plan'. Due to deficiencies and growing criticisms of this layout, the 'corridor plan' was replaced by the 'pavilion plan' with separate blocks.
- 7.132 Southern Grove Lodge was originally designed as a corridor-plan but by the 1890s had evolved into a pavilion plan complex. The pavilion wings and all other ancillary buildings have subsequently been removed with the remaining building signifying a very late example of the corridor plan. Architecturally this is expressed to the exterior through the architectural interplay between the central core of the building and the side wings. The finer architectural details of the building comprise a more austere classical revival style, which reflects the economical approach to workhouse design that was common in this era. The building is constructed primarily with a stock brick, has a simple and symmetrical proportioned form with two wings flanking the central bay and a strong fenestration grid set into articulated recessed bays, creating a strong austere regulated form. The architectural language of the building, therefore, speaks to its origins and purpose and provides a key surviving example of 19th century public institutional architecture in the townscape.



Figure 10: Late 19th Century Photo showing the Central Block and North Pavilion Block.

- 7.133 The heritage appraisal considers that the existing modern office building on the site undermines the significance of the contribution of the former workhouse to the Conservation Area. The office building is of no architectural merit, has an overpowering bulk and mass, has no historic

interest and as such detracts from the setting of Southern Grove Lodge and by extension the Conservation Area. Officers concur with the appraisal set out in the Heritage Statement and find that the existing buildings on the site are clearly at odds with each other and this is exacerbated by the fact that the office building connects to and directly obscures the northern half of the Victorian building where it faces Southern Grove.

- 7.134 The office building has very little design quality, is very much “of its time” and is somewhat incongruous in appearance next to the Victorian building. Not only is the character and appearance of the Victorian building undermined but given that the northern half of the building is obscured by the office block, the symmetry of the building is substantially depreciated in the street scene. Subsequently, the current building arrangement is considered to negatively impact on the character of the heritage asset and the setting of the Conservation Area.
- 7.135 The demolition of the office building would immediately increase the prominence of the Victorian building along Southern Grove and crucially reveal views to its northern wing. The proposed new building will be located on the northern part of the site, moving built form away from the front elevation of Southern Grove Lodge. This allows the Victorian building to develop a significantly better visibility from the public vantage point, greater revealing and enhancing appreciation of the workhouse’s design and the integrity of the original corridor plan and austere architectural pattern.



Figure 11: Existing West Elevation in Context.



Figure 12: Proposed West Elevation in Context.

- 7.136 Officers agree with the Heritage Statement’s assessment and conclusions drawn and consider that the scheme has been carefully designed to capitalise on the opportunity to enhance the setting of the heritage assets and key to this in the first instance has been the removal of the office block.
- 7.137 The design, scale and massing of the development is considered to be acceptable and would not detract from the character and appearance of Southern Grove Lodge. The proposed new building provides a contemporary design response that avoids a pastiche development incorporating replica 19th century detailing.

- 7.138 The detailed elements of the development with regard to height, scale, massing and design have been discussed earlier in the design section of this report. Officers have considered the submitted Heritage Statement and are of the opinion that the proposed development would not result in any harm to but would in fact enhance the setting of the Tower Hamlets Cemetery Conservation Area. The proposal is not considered to impact on the setting of any nearby listed building or the listed boundary wall, gates and gate piers of the Tower Hamlets Cemetery.
- 7.139 In reaching this conclusion, Officers have paid special attention to the desirability of preserving or enhancing the character or appearance of the Tower Hamlets Cemetery Conservation Area in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

AMENITY

- 7.140 Paragraph 17 of the NPPF details within its core planning principles that new development should seek to enhance and improve the health and wellbeing of the places in which people live their lives. Paragraph 80 outlines that development proposals should mitigate and further reduce potential adverse impacts resulting from noise from new development and to avoid noise giving rise to significant adverse impacts on health and quality of life.
- 7.141 Policies 7.1 and 7.6 of the London Plan state that development should not cause unacceptable harm to neighbouring residential buildings in relation to loss of privacy and overlooking.
- 7.142 Policy D.DH8 of the Local Plan requires new developments to protect and where possible enhance or increase the extent of the amenity of new and existing buildings and their occupants, as well as the amenity of the surrounding public realm. To this end development should maintain good levels of privacy and outlook, avoid unreasonable levels of overlooking, not result in any material deterioration of sunlight and daylight conditions of surrounding development. Development should also ensure that there are no unacceptable levels of overshadowing to surrounding open space, private outdoor space and not create unacceptable levels of artificial light, odour, noise, fume or dust pollution during the construction and life of the development.

Daylight and Sunlight

- 7.143 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).
- 7.144 For calculating daylight to neighbouring properties affected by the proposed development, the BRE contains two tests which measure diffuse daylight (light received from the sun which has been diffused through the sky). These tests measure whether buildings maintain most of the daylight they currently received.

Test 1 is the vertical sky component (VSC) which is the percentage of the sky visible from the centre of a window.

Test 2 is the No Sky Line (NSL)/Daylight Distribution (DD) assessment which measures the distribution of daylight within a room where internal room layouts are known or can be reasonably assumed.

- 7.145 In respect of VSC, daylight may be adversely affected if after a development the VSC is both less than 27% and less than 0.8 times its former value.
- 7.146 In terms of the NSL calculation, daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

7.147 The BRE guidance requires that sunlight tests should be applied to windows of main habitable rooms of neighbouring properties within 90° of due south. Sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours or less than 5% of annual probable sunlight hours between 21 September and 21 March, receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

7.148 The submitted daylight/sunlight assessment does not set significance criteria against the assessment results. The assessment has been independently reviewed by Delva Patman Redler who consider that whilst significance criteria are more appropriate for an environmental statement, the following significance criteria should be used against the results in the application of VSC where VSC is reduced to less than 27%, to NSL, and to APSH where APSH is reduced to less than 25% and/or less than 5% in the winter months.

- Reduction of 0% to 20%: negligible impact
- Reduction of 20% to 30%: minor adverse impact
- Reduction of 30% to 40%: moderate adverse impact
- Reduction of more than 40%: major adverse impact

7.149 Delva Patman Redler have therefore applied the significance criteria against the results of the submitted daylight sunlight assessment based on the above values.

7.150 The daylight and sunlight report identify 8 neighbouring 'blocks' of properties and 40 gardens and open spaces surrounding the site that require consideration in relation to daylight, sunlight and overshadowing. Delva Patman Redler consider the scope of the assessment to be acceptable. The following blocks of properties have been assessed:

- 1 to 16 Buttermere House – to the north
- 1 to 16 Tracy House – to the north
- 7 to 25 Hanover Place - to the north
- 1 to 6 Hanover Place (Second Floor) – to the north
- 63 – 76 Brookesley Street – to the east
- 26 to 54 Nailsea Square – to the south-west
- 1-56 Derwent House – to the south
- 13-66 Coniston House – to the west

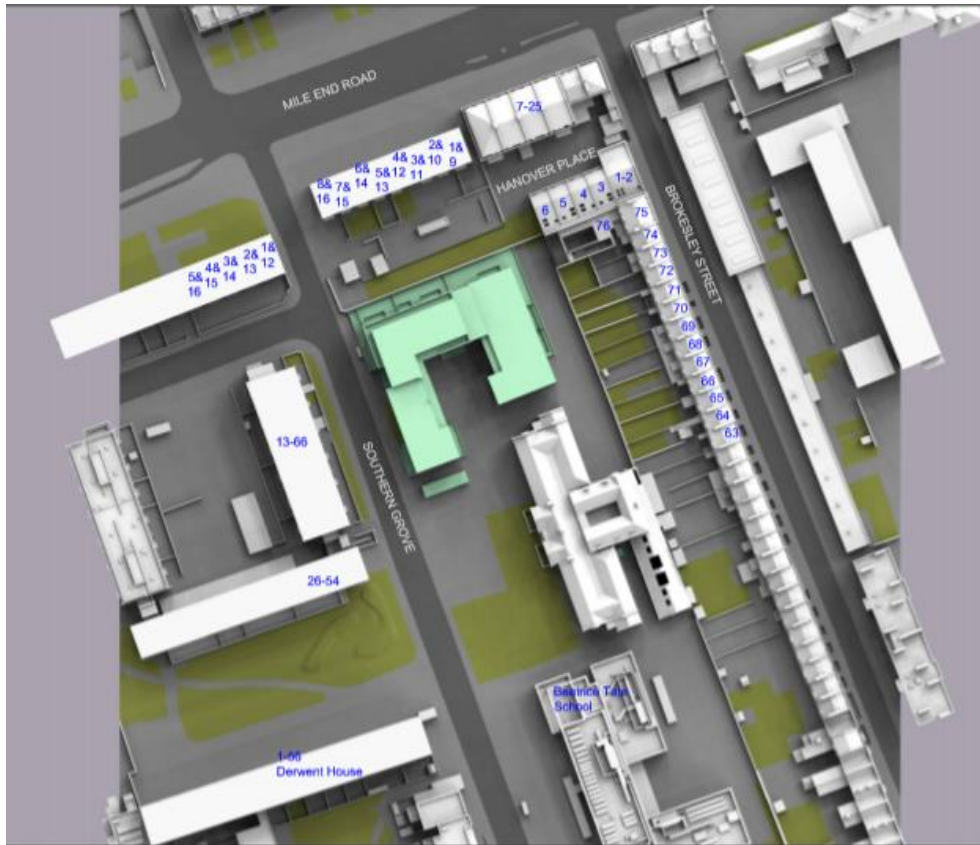


Figure 13: Plan view of neighbouring buildings in relation to proposal.

7.151 The results of the assessment for each block are summarised below:

1 to 16 Buttermere House

7.152 Buttermere House is a 4-storey building containing duplex flats and the results indicate that all the windows except one poorly lit secondary window to each Living/Dining room satisfies the VSC test by either retaining 27% VSC or 0.8 of their former value. The windows that fail have reductions ranging from 23.01% to 34.12%, however the rooms in question are served by multiple windows of which 1 at least would exceed 27% VSC. All windows also satisfy the test for NSL by retaining 0.8 of their former value.

7.153 In respect of sunlight, the APSH results indicate that all the windows will either retain 25% annual and 5% winter sunlight, 0.8 their former value. The results for this block are considered to represent negligible impact.

1 to 16 Tracy House

7.154 Tracy House is a 4-storey building containing duplex flats and 48 windows serving 32 rooms have been assessed. 27 windows will retain either 27% VSC or 0.8 of their former value. Of the windows that fail, 4 windows serve a room that is also lit by a second window that satisfies guidelines and combined, the rooms maintain good access to daylight. 14 windows are marginally above 20% loss (0.8 of their former value) with reductions ranging between 21% to 27.99% and the remaining 3 windows will see a more noticeable change with reductions ranging between 31.3% to 32.97% however in all three instances they are one of two windows serving the room and the combined contribution from both windows maintain good access to daylight.

7.155 The results for this block are considered to represent minor adverse impact with rooms located on the ground and first floors across most of the elevation affected. The transgressions are due

to the proposed massing coming closer to the northern boundary and are magnified by self-obstructing features such as overhangs and overhead balconies. All the windows would satisfy the test for NSL by retaining 0.8 of their former value.

- 7.156 In respect of sunlight, the APSH results indicate that all windows will retain the guidance of 25% annual and 5% winter sunlight or 0.8 their former value and therefore satisfy the guidelines.

7 to 25 Hanover Place

- 7.157 This block is located to the north-east of the proposed development with rear windows facing south-east predominately towards the rear gardens of Brokesley Street. The daylight assessment confirms that all windows and rooms satisfy the BRE guidelines for VSC and NSL by either retaining the guideline criteria or 0.8 of their former value. The results are considered to represent negligible impact.

- 7.158 In respect of sunlight, the APSH results indicate that all windows will retain the guidance of 25% annual and 5% winter sunlight or 0.8 their former value and therefore satisfy the guidelines.

1 to 6 Hanover Place

- 7.159 This block is located to the north-east of the proposed development at the junction between Hanover Place and Brokesley Street. These properties do not have windows directly facing the development and are served by roof lights on their southern elevations. The daylight assessment confirms that all windows and rooms satisfy the BRE guidelines for VSC and NSL by either retaining the guideline criteria or 0.8 of their former value. The results are considered to represent negligible impact.

- 7.160 In respect of sunlight, the APSH results indicate that, with the exception of loss of 1% winter sunlight to one window, all windows will retain the guidance of 25% annual and 5% winter sunlight or 0.8 their former value.

63 to 76 Brokesley Street

- 7.161 These Victorian terraced houses are located to the east of the proposed development, with rear windows facing west towards the development. As no material massing changes are proposed to Southern Grove Lodge, the scope of the assessment has been limited to those properties with a view of the new block.

- 7.162 The daylight assessment confirms that all windows and rooms satisfy the BRE guidelines for VSC and NSL by either retaining the guideline criteria or 0.8 of their former value. The results are considered to present negligible impact.

- 7.163 In respect of sunlight, the APSH results indicate that, with the exception of winter sunlight reductions to four windows ranging between 1% to 3%, all windows will retain the guidance of 25% annual and 5% winter sunlight or 0.8 their former value.

1-56 Derwent House

- 7.164 Derwent House is located to the south of the proposed development, on the opposite side of Southern Grove, with windows facing north towards the proposed development. It should be noted that the proposed massing of the new building is further removed from this block, when compared to the existing office building.

- 7.165 The daylight assessment confirms that all windows and rooms satisfy the BRE guidelines for VSC and NSL by either retaining the guideline criteria or 0.8 of their former value. The results are considered to present negligible impact.

- 7.166 In respect of sunlight, none of the windows that look directly towards the development are orientated 90° of due south and therefore in accordance with the guidelines, the assessment has not been considered further.

26-54 Nailsea Square

- 7.167 This block of flats is located to the south of the proposed development and on the opposite side of Southern Grove, orientated east-west. There are a limited number of windows facing towards the proposed development and the assessment is limited to the rooms at the east end of the block.
- 7.168 The daylight assessment confirms that all windows and rooms satisfy the BRE guidelines for VSC and NSL by either retaining the guideline criteria or 0.8 of their former value. The results are considered to present negligible impact.
- 7.169 In respect of sunlight, none of the windows that look directly towards the development are orientated 90° of due south and therefore in accordance with the BRE guidelines, these have not been considered further.

13-66 Coniston House

- 7.170 This block comprising duplex flats is currently arranged over four storeys and is located to the west of the proposed development and on the opposite side of Southern Grove, orientated north-south. The building has planning permission for a further two floors and the massing of the additional floors has been included to determine the impact to neighbouring properties. However, these have not been assessed for VSC and NSL results as they will only be an improvement upon the floors below and as such will not be materially affected.
- 7.171 In terms of VSC results, 60 windows serving 48 rooms have been assessed. When considering the average VSC figure per room, 32 rooms (67%) would fully comply with BRE guidelines. The rooms that fail would experience minor adverse impacts of between 20.74% and 29.28%. These rooms are located on the ground to second floors at the northern end of the block and the transgressions are as a result of the proposed massing moving closer towards the boundary on Southern Grove, whereby the existing massing is currently set back. All the windows that do not meet the guidelines would achieve retained VSC levels of between 20.04% and 26.55% which could be considered reasonable for an urban environment such as this.
- 7.172 In relation to NSL test, 38 of the 48 rooms tested (79%) would fully comply with the BRE guidelines. Of the 10 rooms that do not meet the recommended guidelines, 2 would experience a minor adverse impact, 6 a moderate adverse impact and 2 a major adverse impact. 9 of these rooms would continue to see direct sky to be between 52.46% and 75% of their area at working plan height which could be considered reasonable for an urban environment. The remaining 1 room would see direct sky to 49.59% of its area.
- 7.173 Overall, the impact of the development to this block in relation to daylight is considered to be minor to moderate adverse.
- 7.174 In respect of sunlight, none of the windows that look directly towards the development are orientated 90° of due south and therefore in accordance with the BRE guidelines, these have not been considered further.

Overshadowing

- 7.175 In respect of overshadowing to neighbouring gardens and amenity areas, the guidelines require that at least 50% of amenity areas should receive at least 2 hours of sunlight on 21 March to

appear adequately sunlit throughout the year. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

- 7.176 In terms of the overshadowing analysis, 40 amenity areas within the vicinity of the proposed development have been identified. These are the garden areas to the south of Tracy House and Buttermere House, the rear gardens to the dwellings in Brokesley Street to the east, the amenity spaces to the south of Nailsea House and the rear yards to Coniston House to the west.
- 7.177 The overshadowing results confirm that all external amenity areas assessed will satisfy the BRE guidelines by virtue of either retaining sunlight to over 50% of the area, 0.8 of their former value or experience no change as a result of the proposals. The impact of the development on neighbouring amenity areas in respect of overshadowing is therefore considered to be negligible.

Conclusions on Daylight, Sunlight and Overshadowing.

- 7.178 In conclusion, the daylight assessment demonstrates that 6 of the 9 properties assessed would experience a negligible impact and 2 would experience a minor adverse impact. Assessment of sunlight and overshadowing impacts demonstrates that there would be a negligible impact on neighbouring properties as a result of the proposals.
- 7.179 The submitted assessment has been independently reviewed by Delva Patman Redler and have been found to be acceptable. Where transgressions have occurred, these have largely been as a result of existing constraints on neighbouring buildings such as overhead balconies. Notwithstanding this, the Mayor's 'Housing' SPG states that an appropriate degree of flexibility needs to be applied when using Building Research Establishment (BRE) guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in accessible locations, and should consider local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time.
- 7.180 In taking all the above into account and the wider benefits of the proposal, the proposal is not considered to result in any material loss of daylight, sunlight and overshadowing detrimental to the living standards and amenities enjoyed by neighbouring occupiers and as such the development is considered to be acceptable on matters relating to daylight, sunlight and overshadowing. .

Overlooking, Loss of Privacy and Outlook.

- 7.181 Policy D.DH8 of the Local Plan sets a guide of an approximate distance of 18 metres between habitable room windows as being appropriate to maintain privacy and overlooking levels to an acceptable degree. However, this figure will be applied as a guideline depending upon the design and layout of the development.
- 7.182 In respect of the proposed development, the notable neighbouring blocks within the immediate surrounding context of the development to consider are the dwellings in Brokesley Street, 1 to 16 Tracy House, 1 to 16 Buttermere House, dwellings in Hanover Place, 13-66 Coniston House and the Beatrice Tate School.

Brokesley Street

- 7.183 The proposed new building will be set back from the north-eastern boundary with the rear gardens of the dwellings in Brokesley Street by approximately 10 metres. In terms of Southern

Grove Lodge, the single storey rear kitchen element abuts the north-eastern boundary whilst the first and second floors (of the 'E' wing) are set back from the boundary by between approximately 3-3.2 metres.

- 7.184 The rear gardens of the dwellings in Brokesley Street generally measure between approximately 19.3 – 19.5 metres deep. Numbers 56-67 Brokesley Street (consecutive) are sited directly opposite Southern Grove Lodge whilst numbers 69-76 Brokesley Street (consecutive) are sited directly opposite new Block A.
- 7.185 There will be sufficient separation distance between Block A and most of the dwellings directly opposite the new block to maintain privacy and overlooking levels. The exception being number 76 Brokesley Street which will have a separation distance of 11 metres from Block A, however there are no windows proposed on the north-eastern elevation of Block A that would be sited directly opposite to number 76 Brokesley Street and equally there are no windows on the southern-western elevation of number 76 Brokesley Street.
- 7.186 Some of the dwellings in Brokesley Street particularly opposite Southern Grove Lodge have been extended to the rear at ground floor level thus reducing the rear garden depths to between 14-16 metres. However, given the setback of the upper floors of the building and that the development does not introduce any additional windows and/or openings to Southern Grove Lodge; thus creating greater opportunities for overlooking and loss of privacy than that which currently exists (albeit it is acknowledged that the building has remained unoccupied for a prolonged period of time), the overall separation distance between the development and the dwellings in Brokesley Street is considered to be acceptable.

1-6 and 7-25 Hanover Place

- 7.187 In respect of 1-6 Hanover Place, this block is sited to the north-east of the application site and all windows on the southern elevation of this block are in the form of rooflights in the roof of these dwellings. As such it is not considered that this block would be impacted upon in terms of overlooking and loss of privacy.
- 7.188 In terms of 7-25 Hanover Place, this building is sited to the north-east and at an oblique angle to Block A. There would be a separation distance of approximately 28 metres from the nearest corner of Block A closest to this building and as such there would be no material overlooking or loss of privacy to these occupiers.

1 to 16 Tracy House

- 7.189 Tracy House is sited directly to the north of Block A and there would be a separation distance of approximately 28 metres and as such there would be no material overlooking or loss of privacy to these occupiers.

1 to 16 Buttermere House

- 7.190 Buttermere House is sited at an oblique angle north-west of Block A and there would be a separation distance of approximately 24 metres from the nearest corner of Block A closest to this building. Therefore, sufficient distance will be maintained to protect privacy levels, particularly given the oblique orientation of this building in relation to Block A.

13 to 66 Coniston House

- 7.191 Coniston House is sited directly west of the application site and on the opposite side of Southern Grove. There would be a separation distance of approximately 20 metres and therefore it is considered that acceptable levels of privacy and overlooking would be maintained.

Beatrice Tate School

- 7.192 The Beatrice Tate School is sited within close proximity of the southern elevation of the former workhouse and there would be a separation distance of approximately 8.6 metres between the flank elevation of the southern wing of Southern Grove Lodge and the north-western elevation of the school building. However, the windows on the north-west elevation of the school building serve voids over a ground level pool and an activity studio and therefore there would be no material loss of privacy or overlooking to these windows.
- 7.193 The school grounds have a hard surfaced play/pitch area sited to the north-east of the school plot which is sited between approximately 12-14 metres south-east of the southern elevation of Southern Grove Lodge. As such there may be some oblique overlooking to this area of the school grounds however, there would be no new opportunities for overlooking introduced in this building and in an urban context such as this it is not unusual for residential dwellings to be in close proximity to school sites thus inevitably resulting in some levels of overlooking. Overall, on balance it is considered that sufficient distance would be maintained to avoid detrimental levels of loss of privacy to the school.

Conclusion

- 7.194 In summary it is considered that the proposed development has been designed having regard to neighbouring buildings and the amenities enjoyed by neighbouring occupiers. Sufficient separation distances would be maintained between the proposed development and neighbouring buildings to ensure that the development does not result in any material loss of privacy, overlooking and outlook detrimental to the living standards and amenities enjoyed by neighbouring residential occupiers.

Noise and Vibration

- 7.195 The application has been accompanied by an Environmental Noise Assessment which demonstrates that technical compliance is achieved with regards to relevant planning policies to ensure that all future residents will enjoy a satisfactory standard of living accommodation within the dwellings, whilst also safeguarding existing background noise levels through appropriate mitigation measures.
- 7.196 No objections have been received from Environmental Health Noise Team. Conditions will be imposed accordingly to ensure that a suitable noise environment is maintained to neighbouring occupiers during the construction period of the development.

Construction Impacts

- 7.197 Demolition and construction activities are likely to cause some additional noise and disturbance, additional traffic generation and dust. In accordance with relevant Development Plan policies a number of conditions are recommended to minimise these impacts. These will control working hours and require the approval and implementation of Construction Environmental Management and Logistics Plan.

TRANSPORT AND SERVICING

- 7.198 The NPPF recognises that sustainable transport has an important role to play in facilitating sustainable development but also contributing to wider health objectives. It is expected that new development will not give rise to conflicts between vehicular traffic and pedestrians.
- 7.199 Policy 6.3 of the London Plan and policies T1 to T6.1 of the Draft London Plan seek to ensure that impacts on transport capacity and the transport network, at local, network-wide and

strategic level, are fully assessed. Furthermore, development should not adversely affect safety on the transport network.

- 7.200 These messages are similarly echoed in local plan policies S.TR1, D.TR2 and D.TR3 which require proposals to have consideration to the local environment and accessibility of the site, on-street parking availability, access and amenity impacts and road network capacity constraints while supporting the Council's commitment to reduce the need to travel and encourage modal shift away from the private car towards healthy and sustainable transport initiatives and choices, notably walking and cycling. Policy S.TR1 particularly promotes the need to prioritise pedestrians and cyclists as well as access to public transport, including river transport, before vehicular modes of transport.

Vehicular and Pedestrian Access

- 7.201 The site has a PTAL (Public Transport Accessibility Level) of 6a on a scale of 1 to 6 where 6b is considered excellent. Mile End Station providing access to the London Underground Network via the Central, District and Hammersmith & City lines is located within 240 metres walking distance to the west of the site on Mile End Road. Bow Church Station is also located within 800m to the east of the site (10 minutes walking distance) providing access to the Docklands Light Railway (DLR) between Stratford and Lewisham.
- 7.202 Southern Grove runs in a north to south orientation with two-way movement between Ropery Street to the south and the A11 Mile End Road to the north. A 20mph speed limit is in place and speed humps are present near to the Beatrice Tate School. Permit holder bays are provided on both sides of the carriageway alongside lengths of single yellow lines. The site is located within controlled parking zone B2 which controls parking between the hours of 08:30 and 17:30 Monday to Friday. Loading/unloading is permitted on yellow lines in close proximity to the site for up to 40 minutes during the hours of control to accommodate servicing requirements.
- 7.203 The site is easily accessed by all modes with networks of footpaths, cycle facilities and access to public transport facilities mentioned above within close proximity of the site. Key locations of Bow, Mile End, Bromley-by-Bow and Stepney Green are located within a 20 minute walking distance from the site. The Transport Assessment identifies that Burdett Road, Hamlet Way and Campbell Road are routes signed or marked for use by cyclists whilst Bow Common, St Paul's Way and Stepney Road are routes recommended by cyclists. Furthermore, Cycle Superhighway 2 (CS2) runs along Mile End Road between Whitechapel and Stratford, whilst CS3 is located to the south and runs between Tower Gateway and Barking.
- 7.204 The application site currently has a vehicular crossover accessible from Southern Grove at its most northern point allowing access to the site's existing car park. Pedestrian access is also provided directly from the pavement to the office building.
- 7.205 The existing vehicular crossover will be removed, and the highway reinstated whilst a new vehicular access point will be provided centrally to access the blue badge spaces within the development. The new vehicular crossover will result in the loss of 2 on-street parking spaces to facilitate the development. However, there is the potential to provide a replacement on-street parking space directly north of the new crossover.
- 7.206 In terms of pedestrian access arrangements, key internal routes within the development demarcated by a combination of resin bound gravel surfacing or paving will direct pedestrians towards entrances to buildings.
- 7.207 Overall, the access arrangements to the site are considered to be satisfactory. The Highways Officer has reviewed the access arrangements and has expressed no objections. The

proposed works to the highway will require the applicant to enter into a Section 278 agreement under the Highways Act 1980 and this will be secured by condition.

Car Parking

- 7.208 The development would essentially be 'car free' with the exception of five blue badge spaces within the site boundary. These are located directly south of the vehicular access route into the site.
- 7.209 The 'car free' nature of the proposed is supported in policy terms and occupiers of the development would be required to enter into a 'permit-free' agreement preventing residents from obtaining a parking permit for on-street parking within the Borough. This will be secured via condition. It should be noted that the applicant had initially proposed to provide a 3-year car club membership to future residents for existing car clubs operating in the vicinity of the site however in light of the Council's commitment to reducing reliance on the use of the car as the primary mode of transport and the absence of support for this offer from the Highway's Team, Officers do not consider that this should be a direction that should be pursued further and therefore would not be seeking to secure this through the planning permission.
- 7.210 Draft London Plan policy T6.1(G) seeks to ensure that blue badge parking spaces are provided for 3% (3 spaces required) of the total number of units from the onset of the development. The applicant is required to demonstrate via a Parking Design and Management Plan how an additional 7% of dwellings could be provided with a blue badge space. The scheme proposes 5 spaces (6%) from the offset and therefore this is in accordance with the Draft London Plan and this will be allocated based on an assessment of needs. The 4% future provision of blue badge spaces will be secured via a Parking Design and Management Plan.
- 7.211 In accordance with Draft London Plan policy T6.1(C), 20% (1 parking space) shall be fitted with an electric vehicle charging point with passive provision for all remaining spaces. This will be secured via condition.

Servicing and Deliveries

- 7.213 The servicing arrangement for the site including waste collection would utilise the proposed vehicular access path within the development as an internal loading area. Equally the single yellow lines outside the site boundary would be available for loading/unloading. Waste collection for Block B will occur within the site boundary from a waste collection point adjacent to the blue badge spaces whilst waste from Block A can be collected from the street with the refuse store fronting Southern Grove.
- 7.214 It is noted that the location of the refuse storage provision for the Southern Grove Lodge falls outside the building envelope and this will result in carry distances from the units within the converted former workhouse exceeding 30 metres. Part H of the Building Regulations requires that carry distances should not *usually* exceed 30 metres (excluding any vertical distance). However, the approved Building Regulation document reference to *usually* infers that a certain amount of flexibility can be applied. In this instance due to the site constraints, and discussions held with the Building Control Team during the pre-application stage, the location of the refuse stores for the units of Southern Grove Lodge was accepted as being the only reasonable location to provide refuse facilities for Block B.
- 7.215 The servicing strategy for the site is considered to be acceptable in principle and supported by the Highways Officer. In the absence of detailed comments from the Waste Team in respect of this proposal, Officers consider that it would be prudent to impose a condition requiring the submission of a Waste and Serving Management Plan.

Cycle Parking

- 7.216 Policy 6.9 and Table 6.3 of the London Plan and policy D.TR3 of the Local Plan requires that across the development a minimum of 128 long stay and 2 short stay cycle parking spaces are provided. Policy T5 and Table 10.2 of the Draft London Plan requires that 138 long stay and 3 short stay cycle parking spaces are provided.
- 7.217 For units within Block A cycle parking provision should equate to a minimum of 75 spaces and for Block B this should equate to 53 spaces based on current London Plan Standards. The provision increases to 80 spaces for Block A and 58 spaces for Block B based standards set in policy T5 and Table 10.2 of the Draft London Plan.
- 7.218 The development seeks to provide 139 cycle parking spaces predominantly in 2 locations for cycle stores. Block A will contain two cycle stores; of which one will make provision for 40 spaces for the affordable units whilst a larger store will serve both blocks. A smaller area accommodating 4 spaces for larger non-standard sized cycles will also be dedicated for Block A. The second larger store will be subdivided internally to accommodate cycle parking for both blocks and make provision for 36 spaces (Block A) and 53 spaces (Block B) respectively. A further 6 spaces will be provided within the building envelope of Block B. In accordance with the London Cycling Design Standards (LCDS), 5% of the number of spaces for each block will comprise spaces to accommodate larger cycles to ensure that a diverse range of cycle parking spaces are provided rather than wholly two-tier racks. 4 short-stay cycle parking spaces will also be provided. The total provision is therefore in accordance with current London Plan and Draft London Plan policies.
- 7.219 Officers acknowledge that it is not ideal that the cycle parking spaces for Southern Grove Lodge (with the exception of 6 spaces) are contained in Block A, however this is due to the physical constraints of the building envelope of the former workhouse building. Officers have liaised with the Designing Out Crime Officer who has advised that they have undertaken previous discussions with the applicant, and it is their understanding that the larger store would be separated internally by robust cages/mesh screens and accessed by two separate doors by occupiers of each respective block.
- 7.220 The Designing Out Crime Officer considers that if external security tested doors, recordable access control (in accordance with Secured by Design) together with supporting CCTV, appropriate lighting and active estate management is in place, then these shared cycle spaces can be appropriately managed between the two blocks. Officers will be imposing a condition requiring the submission of details of measures demonstrating how Secured by Design measures are being incorporated into the scheme.

Trip Generation

- 7.221 The submitted Transport Statement has undertaken a standard TRICS-based assessment of the proposed development to determine the anticipated level of traffic generation relative to the existing office use.
- 7.222 The TRICS data for the existing office use has the potential to generate 106 two-way person movements in the typical weekday AM Peak Hour (08:00-09:00), 104 two-way person movements in the PM Peak Hour (17:00-18:00) and 970 two-way person movements across the entire day. Most trips to the office are made by public transport modes with 60 trips during the AM Peak Hour, 59 trips during the PM Peak Hour and 548 trips across the day. The office space is predicted to also receive 27 car trips during the AM Peak Hour, 28 car trips during the PM Peak Hour with a total of 243 car trips across the day.
- 7.223 In contrast to the above the proposed residential development will have significantly reduced trips generating 36 person movements in the AM Peak Hour, 30 person movements in the PM Peak Hour and 337 person movements across the day. The assessment considers that the

majority of trips to and from the site will be undertaken by public transport, in particular Underground services, which would generate 16 total trips during the AM Peak Hour, 14 total trips during the PM Peak Hour and 153 total trips across the day period. Car trips will account for 25 trips across the day with circa 2-3 car trips during the AM and PM Peak Hours.

- 7.224 In terms of delivery and serving trip generation, trip generation has been calculated using the City of London's Loading Bay Reckoner metric of 0.22 deliveries per 100sqm. When applied to the total office floor area of 3,477sqm, this is likely to generate 8 delivery/servicing vehicles or 8 arrivals and 8 departures. It is anticipated that 5% of the total servicing vehicles will be OGV's (Ordinary Goods Vehicles) with the remaining 95% LGVs (Large Goods Vehicles).
- 7.225 The residential units are expected to generate a demand for circa 10 delivery/servicing vehicles per day however the Transport Statement considers that this is not considered to have an impact on the highway network. It is anticipated that 5% of the total servicing vehicles will be OGV's with the remaining 95% LGVs.
- 7.226 In summary, the development will result in a betterment in terms of total trip generation during the AM Peak Hour, the PM Peak Hour, across the day and would be substantially less than the current baseline position particularly in respect of person movement and car trips across the day. Overall, there is no objection to the assessment provided and it is not considered that the proposal will detrimentally impact on the local highway network.

Travel Plan

- 7.227 The application has been accompanied by residential Travel Plan which has been reviewed by the Highways Officer. All residents of the development will be made aware of the Travel Plan and be provided with a Welcome Pack which will contain amongst other things, a summarised version of the Travel Plan, its purpose, key benefits and sustainable transport information. Residents will also be encouraged to use sustainable modes of transport and information to residents encouraging sustainable modes of transport will be conveyed to residents via notice boards in common areas, newsletters and post, emails and text alerts and website. A condition will be imposed requiring that the development is implemented in accordance with the approved Travel Plan.

Demolition and Construction Traffic

- 7.228 The Construction Environmental Management Plan secured via a planning condition would need to consider the impact on pedestrians, cyclists and vehicles as well as fully considering the impact on other developments in close proximity.

Summary

- 7.229 In summary, subject to securing relevant conditions identified above, the proposal is supported in terms of transport matters and promotes sustainable modes of transport. The proposal is not considered to have any material impact on pedestrian or vehicular safety or result in undue pressure on the local highway network in accordance with policies S.TR1, D.TR2, D.TR3 and D.TR4 of the Local Plan (2020) and policies 6.1, 6.3, 6.8-6.13 of the London Plan (2016).

ENVIRONMENT

Energy Efficiency and Sustainability

- 7.230 At the national level, the NPPF sets the direction of travel for the planning system to support the transition to a low carbon future in a changing climate. In this regard, the planning system should help to amongst other things, shape places in ways that contribute to radical reductions in greenhouse gas emissions and support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.
- 7.231 At the strategic level, Chapter 5 of the London Plan and Chapter 9 of the Draft London Plan require development to contribute to mitigation and adaptation to climate change. Specifically, policy 5.2 of the London Plan and policy SI2 of the Draft London Plan requires development proposal to make the fullest contribution to minimising carbon dioxide emissions with policy SI2 specifically identifying that major development should be net zero-carbon. This means reducing greenhouse gas emissions and minimising energy demand in accordance with the following hierarchy:
1. Be Lean: Use Less Energy
 2. Be Clean: Supply Energy Efficiently
 3. Be Green: Use Renewable Energy
 4. Be Seen: Monitor and Report
- 7.232 At the local level, the national and strategic messages are similarly echoed in policies S.ES1 and D.ES7 of the Local Plan. Policy D.ES7 specifically requires that for residential developments, zero carbon should be achieved through a minimum of 45% reduction in regulated carbon dioxide emissions on-site and the remaining regulated carbon dioxide emissions to 100% are to be off-set through a cash in lieu contribution.
- 7.233 The application has been accompanied by an Energy Statement which demonstrates that the development is anticipated to achieve a site-wide reduction in carbon dioxide emissions of 76.3% through the adoption of passive and active design measures (Be Lean), the use of photovoltaic panels (41kWp Photovoltaic array) and the use of Air Source Heat Pumps (ASHP) to provide renewable energy (Be Green). The application site is located in an area where there is currently no feasibility of connecting to an existing heating and cooling network (Be Clean) and therefore no carbon savings can be achieved for this step of the energy hierarchy.
- 7.234 The Energy Statement identifies an annual baseline emission rate of 149.1 tonnes after each step of the Energy Hierarchy for the development using SAP10 factors. The proposal results in 113.7 tonnes of regulated CO₂ savings on-site with 35.4 tonnes to be off-set through a carbon offsetting contribution of £100,890 to achieve net zero carbon for the development and deliver a policy compliant scheme. The carbon offset contribution will be secured via condition.

Summary and Securing the Proposals

- 7.235 It is considered that the proposals are in accordance with adopted policies for sustainability and CO₂ emission reductions and it is recommended they are secured through appropriate conditions to deliver:
- Submission of a Zero Carbon Futureproofing Statement.
 - Submission of post construction energy assessment including 'as-built' calculations to demonstrate the reductions in CO₂ emissions have been delivered on-site.

Air Quality

- 7.236 Policy 7.14 of the London Plan emphasises the importance of tackling air pollution and improving air quality and states that development proposals should minimise increased

exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas). Similarly, policy SI1 of the Draft London Plan states that all development should be air quality neutral as a minimum. At the local level, policy D.ES2 of the Local Plan requires development to meet or exceed the 'air quality neutral' standard.

- 7.237 The submitted Air Quality Assessment has assessed the potential air quality impacts of the proposed development both during the construction and operational phases. The assessment demonstrates that the substantially reduced number of traffic movements that are forecast to be generated from the development relative to the current use would have a positive impact on local air quality to the point that transport-related emissions can be considered to be air quality neutral.
- 7.238 A detailed dispersion modelling has been undertaken of the proposed development to predict pollutant concentrations at the proposed development. The assessment indicates that concentrations of NO₂, PM₁₀ and PM_{2.5} will be well within the short-term air quality objectives. The proposed development will not, therefore, result in new exposure to poor air quality.
- 7.239 Heat and hot water will be provided by ASHPs in conjunction with low NOx gas boilers. The boilers will be compliant with the GLA emission limits set out in the Sustainable Design and Construction SPG. The building-related emissions have been assessed as Air Quality Neutral.
- 7.240 The Council's Air Quality Team have reviewed the assessment and concur with its findings that air quality impacts will be below the national air quality limit values. No objections have been raised subject to conditions relating to construction environmental management and logistics plan, emissions from construction plant and machinery and low NOx boilers.

Flood Risk & Drainage

- 7.241 Policy 5.13 of the London Plan states that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out within this policy. The policy aspirations are also reiterated by policy SI13 of the Draft London Plan and at local level by policies D.ES4 and D.ES5 which seek to reduce the risk of flooding.
- 7.242 The proposal would increase the permeability of the site through enhancements identified earlier in the landscaping and biodiversity section of this report thus complying with Local Plan policy requirement for incorporating principles of sustainable urban drainage. The site is located in Flood Zone 1 and therefore has low risk of flooding however a detailed surface water drainage scheme will be secured by condition.

Land Contamination

- 7.243 The application has been reviewed by the Council's Environmental Health Land Contamination Officer and subject to standard conditions, the proposals would be acceptable. Any contamination that is identified can be addressed within the condition approval process and will ensure that the site is made safe prior to any construction or demolition works taking place.

INFRASTRUCTURE IMPACT

- 7.244 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £235,544.11 and Mayor of London CIL of approximately £93,656.82 (inclusive of social housing relief and exclusive of indexation).

7.245 This would result in a total CIL payable of £329,200.93. This figure is approximate from the information submitted and will be scrutinised again once CIL is payable upon commencement of the development following the grant of planning permission.

7.246 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.

7.247 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD as follows:

- £25,812.00 towards construction phase employment skills training.
- £100,890.00 towards carbon offsetting.

7.248 The following non-financial obligations will also be secured:

1. Housing

- 63% Affordable Housing by habitable room (42 units)
- 15 units Tower Hamlets Living Rent
- 15 Units London Affordable Rent
- 12 Units London Living Rent
- Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to M4 (3)(2)(b) standard)

2. Access to Employment

- 20% of goods, services and construction phase workforce to be secured locally.
- 6 construction phase apprenticeships.

3. Transport Matters

- Car and Permit Free
- Scheme of Highway Works

4. Compliance with Considerate Constructors Scheme

HUMAN RIGHTS & EQUALITIES

7.249 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.

7.250 The proposed new residential accommodation meets inclusive design standards and 12% of the new homes in Block A will be wheelchair accessible all of which will be within the affordable tenure and 5 blue badge spaces are provided. It is acknowledged however, due to the constraints of the existing Victorian building that wheelchair accessible units are unable to be provided in Block B. However, the scheme overall would benefit future residents, including people with disabilities, elderly people and parents/carers with children. The development will also secure cycle parking in accordance with the London Design Cycling Standards to enable cycle parking for different user groups i.e. wider cycle parking spaces to accommodate non-standard sized cycles.

7.251 The proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

8.1 That **conditional planning permission is GRANTED** subject to the following conditions:

Compliance

1. 3 years deadline for Commencement of Development.
2. Development in Accordance with Approved Plans.
3. Personal Permission.
4. Restrictions on Demolition and Construction Activities:
 - a. All works in accordance with Tower Hamlets Code of Construction Practice
 - b. Standard hours of construction and demolition
 - c. Air quality standards for construction machinery
 - d. Ground-borne vibration limits
 - e. Noise pollution limits.
5. External Lighting.
6. Wheelchair Accessible Units.
7. Precautions to Prevent Harm to Bats (Southern Grove Lodge).
8. Timing of Vegetation Clearance (Breeding Birds).
9. Cycle Parking
10. Travel Plan
11. Air Quality Emission Standards

Pre-Commencement

12. Avoidance of Harm to Wild Mammals.
13. Piling.
14. Construction Environmental Management Plan and Construction Logistics Plan.
15. Construction Plan and Machinery (NRMM).
16. Contaminated Land
17. Details of External Facing Materials and Architectural Detailing (Southern Grove Lodge).
18. Financial Contributions.
19. Non-Financial Contributions (Access to Employment and Transport Related).
20. Non-Financial Contributions (Housing).
21. Early Stage Viability Review.

Pre- Superstructure Works

22. Details of Landscaping including Hard and Soft Landscaping, Maintenance Plan, Lighting, Boundary Treatment and any Street or Play Furniture.
23. Play and Communal Amenity Area Details.
24. Biodiversity Mitigation and Enhancements.
25. SUDS.
26. Details of External Facing Materials and Architectural Detailing (Block A).
27. Secure by Design Standards.

Pre-Occupation

28. Accessible Car Parking, EVCP and Parking Management Plan.
29. Delivery, Servicing and Waste Management Plan.
30. Energy and Efficiency Standards.
31. Secure by Design Accreditation.

9. INFORMATIVES

1. Development is Liable for CIL
2. Street Naming and Numbering
3. Thames Water - Groundwater Risk Management Permit, minimum pressure/flow rate.
4. Building Control
5. S278
6. Fire and Emergency
7. Footway and Carriageway
8. Hours of Work for Demolition and Construction Activities
9. Designing out Crime

APPENDIX 1 – LIST OF DRAWINGS AND DOCUMENTS

Drawings:

6941_Underground_R0 – Underground Survey
6941_Basement_R0 – Basement Sheet 1 of 2
6941_Basement_R0 – Basement Sheet 2 of 2
6941_Elevations_R2 – Elevations Sheet 1 of 6
6941_Elevations_R2 – Elevations Sheet 2 of 6
6941_Elevations_R2 – Elevations Sheet 3 of 6
6941_Elevations_R2 – Elevations Sheet 4 of 6
6941_Elevations_R2 – Elevations Sheet 5 of 6
6941_Elevations_R2 – Elevations Sheet 6 of 6
6941_Ground_R0 – Ground Floor Sheet 1 of 3
6941_Ground_R0 – Ground Floor Sheet 2 of 3
6941_Ground_R0 – Ground Floor Sheet 3 of 3
6941_First_R0 – First Floor Sheet 1 of 2
6941_First_R0 – First Floor Sheet 2 of 2
6941_Second_R0 – Second Floor Sheet 1 of 2
6941_Second_R0 – Second Floor Sheet 2 of 2
6941_Roof_R0 – Roof Survey Sheet 1 of 2
6941_Roof_R0 – Roof Survey Sheet 2 of 2

2785_SKE_100000_C – Location Plan
2785_SKE_100001_A – Proposed Demolition Plan
2785_SKE_100001_C – Existing Site Plan

2785_GAD_140000-C – Existing Elevations
2785_GAD_140010_D – Proposed Elevations Sheet 1 of 2
2785_GAD_140011_B – Proposed Elevations Sheet 2 of 2
2785_GAD_140012_A – Proposed West Elevation Detail
2785_GAD_140020_A – Proposed West and North Elevations
2785_GAD_140021_A – Proposed East and South Elevations
2785_GAD_150000_A – Proposed Section A-A

1621-GA-100 Revision B – Landscape GA
1621-GA-101 Rev A – Open Space Strategy Diagram
1621-PP-300 Revision B – Planting Plan

2785_GAD_120010_P – Proposed Ground Floor Site Plan
2785_GAD_12011_K – Proposed First Floor Site Plan
2785_GAD_120012_J – Proposed Second Floor Site Plan
2785_GAD_120013_J – Proposed Third Floor Site Plan
2785_GAD_12014_J – Proposed Fourth Floor Site Plan
2785_GAD_120015_G – Proposed Fifth Floor Site Plan
2785_GAD_120016_D – Proposed Roof Plan
2785_GAD_120020_E – Proposed Tenure Allocation GA Plans

2785_GAD_120021_A – Proposed Block A Residential Unit Plan 1B2P
2785_GAD_120022_C – Proposed Block A Residential Unit Plan 2B3P
2785_GAD_120023_C – Proposed Block A Residential Unit Plan 2B4P
2785_GAD_120024_C – Proposed Block A Residential Unit Plan 3B5P
2785_GAD_120025_A – Proposed Block A Residential Unit Plan 3B5P

2785_GAD_120026_C – Proposed Block A Residential Unit Plan 3B6P
2785_GAD_120027_B – Proposed Block A Residential Unit Plan 4B6P
2785_GAD_120030_F – Proposed Block A Ground Floor Plan
2785_GAD_120031_D – Proposed Block A First Floor Plan
2785_GAD_120032_C – Proposed Block A Second Floor Plan
2785_GAD_120033_C – Proposed Block A Third Floor Plan
2785_GAD_120034_D – Proposed Block A Fourth Floor Plan
2785_GAD_120035_D – Proposed Block A Fifth Floor Plan

2785_GAD_120036_B – Proposed Block B Basement Floor Plan
2785_GAD_120037_C – Proposed Block B Ground Floor Plan
2785_GAD_120038_B – Proposed Block B First Floor Plan
2785_GAD_120039_B – Proposed Block B Second Floor Plan
2785_GAD_120040_B – Proposed Block B Roof Plan
2785_GAD_120060_B – Proposed Block B Residential Unit Plan 1B1P
2785_GAD_120061_B – Proposed Block B Residential Unit Plan 1B2P
2785_GAD_120062_B – Proposed Block B Residential Unit Plan 2B3P
2785_GAD_120063_B – Proposed Block B Residential Unit Plan 2B4P
2785_GAD_120064_B – Proposed Block B Residential Unit Plan 2B4P Duplex
2785_GAD_120065_C – Proposed Block B Residential Unit Plan 3B5P
2785_GAD_120066_B – Proposed Block B Residential Unit Plan 3B5P Duplex

2785_GAD_120072_C – Proposed Cycle Storage Access
B202057PV-20200603 – PV Layout Plan

2785_SKE_500062_A – Computer Generated Image Street View Facing North East
2785_SKE_500063_A – Computer Generated Image Site View Facing North
2785_SKE_500064_B – Existing Elevations Mark-Up

Documents:

Planning Statement produced by Renew Planning dated April 2020.
Health Impact Assessment Produced by Renew Planning dated April 2020.

Design and Access Statement produced by Architecture PLB dated April 2020.

Heritage Statement produced by Heritage Collective dated April 2020 report ref: 05127.

Planning Daylight & Sunlight Report Rev A produced by Avison Young dated April 2020.
Supplementary Internal Daylight Assessment produced by Avison Young dated April 2020.
Internal Daylight Amenity Addendum Letter produced by Avison Young dated 22nd July 2020.
Sunlight Assessment Addendum Letter produced by Avison Young dated 27th August 2020.

Arboricultural Assessment produced by FPCR Environment and Design Ltd dated March 2020.
Ecological Appraisal produced by FPCR Environment and Design Ltd dated March 2020.

Environmental Noise Assessment produced by XCO2 dated April 2020.
Air Quality Assessment produced by XCO2 dated April 2020.
Energy Statement produced by XCO2 dated April 2020.
Sustainability Statement produced by XCO2 dated April 2020.
Utilities Statement Report produced by XCO2 dated April 2020.

Report on Preliminary Investigation produced by Ian Farmer Associates

Stage 2 Fire Strategy produced by Elementa dated 25 March 2020.

Residential Travel Plan produced by Caneparo Associates dated March 2020.
Transport Statement produced by Caneparo Associates dated March 2020.

SUDS Report/Flood Risk Assessment Version 3 produced by Graphic Structures dated March 2020.

Schedule of Accommodation: 2785_SCH_460004_T Rev T dated 24.07.20.

Proposed Elevations:



A-A
West Elevation



B-B
North Elevation



C-C
East Elevation



D-D
Courtyard East Elevation



E-E
Courtyard South Elevation



F-F
Courtyard West Elevation

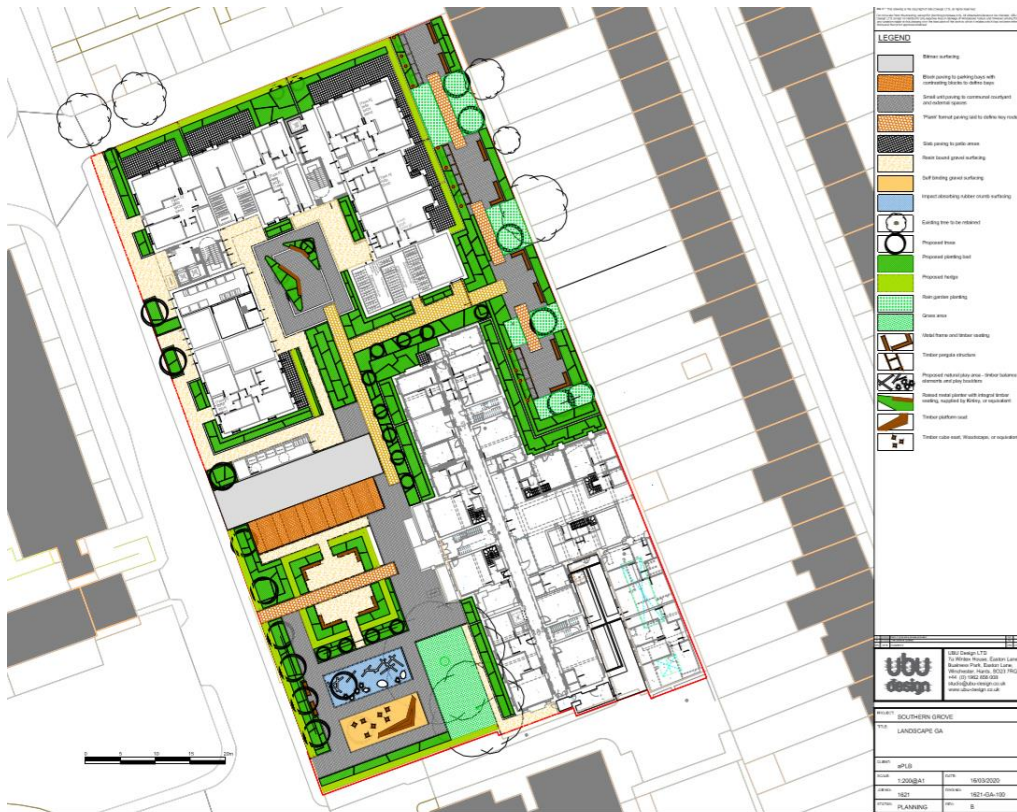
CGI Street View Facing North East:



CGI View Within Site Facing North:



Proposed Landscape Plan:



Proposed Communal Amenity and Children's Play Strategy:



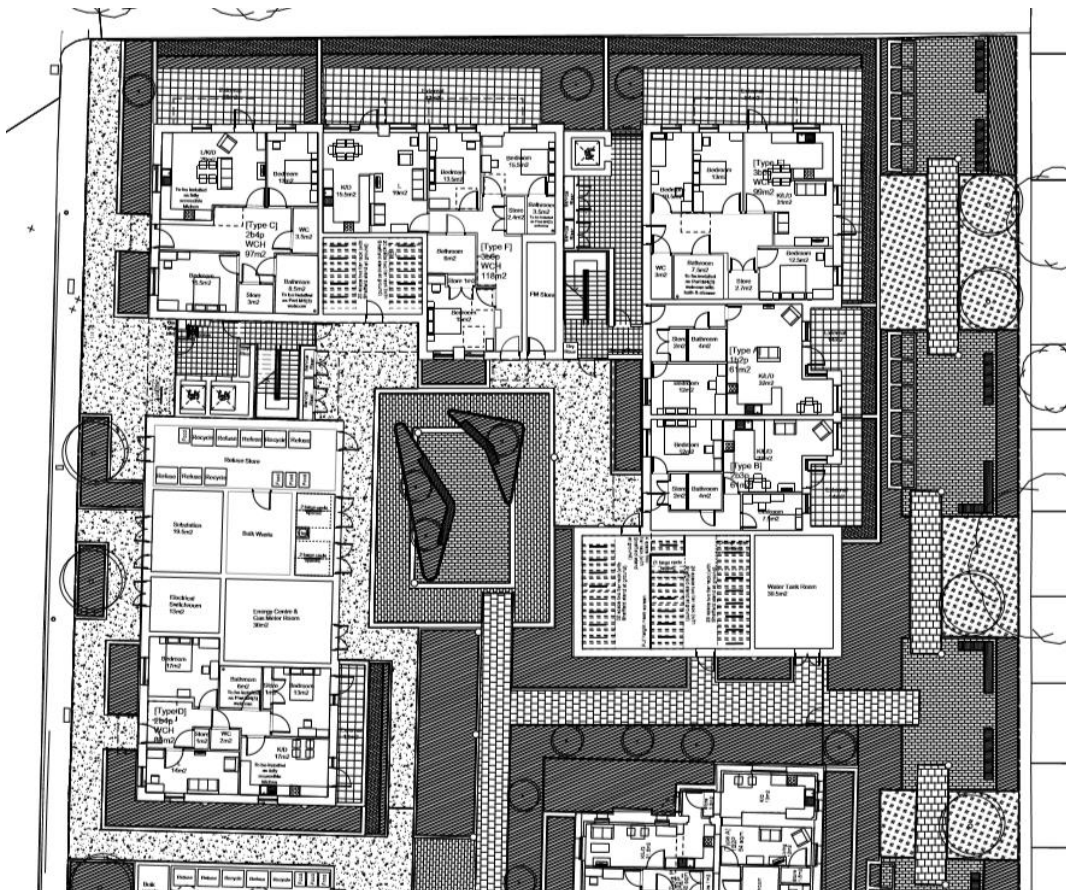
Photos of Southern Grove Lodge:



Photo of Existing Office Building:



Typical Floor Plan – Block A (Ground Floor):



Typical Floor Plan – Southern Grove Lodge

