



## DEVELOPMENT COMMITTEE

11/03/2021

Report of the Corporate Director of Place

Classification: Unrestricted

### Pre-application presentation

<b>Reference</b>	PF/20/00126
<b>Site</b>	Exmouth Estate, London, E1
<b>Ward</b>	Stepney Green
<b>Proposal</b>	The demolition of Brayford Square (13 homes, and associated retail and community uses) and existing basketball court, with the erection of four new blocks comprising of residential units, community and commercial floorspace, together with associated landscaping, MUGA facilities, basement car parking spaces and associated ancillary works.
<b>Applicant</b>	Swan Housing Association
<b>Architect</b>	Levitt Bernstein
<b>Agent</b>	Barton Willmore
<b>Case Officer</b>	Adam Garcia
<b>Key dates</b>	Pre-application request submitted June 2020 Pre-app discussions began in July 2020 CADAP review in November 2020

# SITE PLAN



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

## Planning Applications Site Map PF/20/00126

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



Date: 03 March 2021

## 1. BACKGROUND

- 1.1 The National Planning Policy Framework and the National Planning Practice Guidance promote early engagement between developers and Local Planning Authorities at the pre-application stage, prior to submitting a planning application. The Council welcomes pre-application discussions and has a well-established process to facilitate this. In March 2019 the Council's Development and Strategic Development Committees considered a draft protocol for pre-application presentations. The protocol is now incorporated in the Committee Terms of Reference. The Council's updated Statement of Community Involvement also highlights the importance of pre-application engagement and the role of elected members and local communities in this stage of the planning process.
- 1.2 This report updates the Development Committee on progress made and issues identified in respect of pre-application discussions for the proposed regeneration scheme at the Exmouth Estate.

## 2. DESCRIPTION OF THE PROPOSAL

**Figure 1: Proposed Site Layout**



- 2.1 The pre-application proposal involves the demolition of the existing buildings at the centre of the site, known as Brayford Square. As per the latest pre application proposals, new residential-led mixed use buildings ranging in height from 3 to 9 storeys would be erected to provide 228 affordable homes (Use Class C3), 962sqm multi use games area (Use Class E), 790sqm Cultural and Performing Arts Centre (Use Class Sui Generis), 648sqm community centre (Use Class F.2), 231sqm Carers Centre (Use Class F.2), 411sqm Nursery (Use Class E), 649sqm of flexible retail/commercial/ business floorspace (Use Class E), new publicly accessible open space and associated access, servicing, parking, landscaping works including tree removal , refuse/ recycling and bicycle storage, energy centre and works.

**Figure 2: CGI Visualisation**



### **3. SITE AND SURROUNDINGS**

- 3.1 The site forms part of the Exmouth Estate, a large council housing estate built in the 1970s. The estate is typical of many post-war housing estates in the borough, typified by large slab blocks of approximately five to six storeys around large open spaces. The estate is bound by Commercial Road to the south, Jubilee Street to the west, Clark Street to the north and Jamaica Street and Ayleward Street to the east.
- 3.2 Within the red line boundary itself is Brayford Square, which is located at the centre of the estate on Commercial Road. Brayford Square is home to 9 commercial/community uses including a GP surgery, a pharmacy, a beauty salon, shops/newsagents, a carer's centre and the residents' clubhouse. In addition to this there are 13 homes within Brayford Square. This part of the estate suffers with lack of legibility and is detached from the wider area.
- 3.3 Open space within the estate is generous but underused, characterised by large fenced and unfenced open grassland and incoherent pedestrian routes. There are however a number of attractive large trees, particularly along Commercial Road. These contribute significantly to the street scene.
- 3.4 Also, within the red line boundary is the former Stepney's nightclub which used to form part of the adjacent George Tavern (Grade II Listed) at the junction of Commercial Road and

Jubilee Street. There are a number of other listed buildings adjacent to the estate including the Church of St Mary and Michael, 368-374 Commercial Road, the East End Maternity Hospital and 398-404 Commercial Road. A former pub in the estate at 9 Exmouth Street was delisted and is now considered a non-designated heritage asset.

- 3.5 The site is bordered by the Commercial Road Conservation Area to the west and the Albert Gardens Conservation Area to the east. The site is not located in a town centre.

#### **4. RELEVANT PLANNING HISTORY**

- 4.1 **PA/21/00111:** Request for an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations') in respect of a proposed development which includes demolition of existing buildings, except for the Exmouth Estate Community Hub, and construction of up to 250 residential dwellings, up to 1,200 sqm retail/commercial floorspace, up to 2,000 sqm community floorspace, a Multi-Use Games Area (MUGA), open space, landscaping, access and associated works. EIA Not Required: 03/02/2021

#### **5. PUBLICITY AND ENGAGEMENT**

- 5.1 The applicant has undertaken their own public engagement and consultation with the local community despite the sensitivities of this application and the impacts of the recent lockdown restrictions. This can be summarised as follows:

- Meeting with Exmouth Residents Board – September 2019
- 2 public consultation events: February 2020 and September 2020 (online)
- Door-to-door residents survey with all households on the estate in October 2019
- Think Big project with 70 young people from the Exmouth Estate
- 11 Exmouth Residents' Steering Group (ERSG) meetings consulting on the proposals

- 5.2 In November 2020, the applicant issued a first pack of information to 1,625 residents and businesses neighbouring the site. This included a letter setting out some early information on the site, the project team and some indications of the intended design approach, as well an illustrative diagram.

- 5.3 An earlier version of the current proposal was presented to the Council's Conservation and Design Advisory Panel (CADAP) on 9<sup>th</sup> November 2020 to test the principles of the proposal. The panel's written response welcomed the opportunity to review the development proposal and offered the following comments:

- 8 stories were considered too tall as a general building height. 6 stories were felt to be more appropriate with some 'moments of height' elsewhere.
- Some concerns raised around the elevational design.
- Queries as to whether there would be sufficient daylight penetration on the northern sides of the proposals to support the design intentions.
- The landscaping aspirations were supported and should meet policy requirements for biodiversity net gains and the Urban Greening Factor.

5.4 The project architects have revised the scheme respond to CADAP's comments and the feedback received throughout the pre-application discussions with Council officers. The height of the proposal has been brought down to a general height of 6 storeys with two taller, 9-storey buildings marking the gateway to the site. Further work has also been undertaken to the landscaping and to the layout of the site to maximise daylight and sunlight penetration.

## **6. RELEVANT PLANNING POLICIES AND DOCUMENTS**

6.1 The Development Plan comprises:

- The London Plan (2021)
- Managing Growth and Sharing the Benefits - Tower Hamlets Local Plan 2031 (2020)

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

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (updated 2019)
- National Design Guide (2019)
- GLA, The Mayor's Good Practice Guide to Estate Regeneration (2018)
- GLA, Social Infrastructure (2015)
- GLA, Accessible London: Achieving an Inclusive Environment (2014)
- GLA, Character and Context (2014)
- GLA, Sustainable Design and Construction (2014)
- GLA, Green Infrastructure and Open Environments: The All London Green Grid (2012)
- GLA, London View Management Framework SPG (2012)
- GLA draft Design for a Circular Economy Statement SPD (2020)
- LBTH, Draft Planning Obligation SPD (2nd draft) 2020
- LBTH, Albert Gardens Conservation Area Character Appraisal and Management Guidelines (2009)
- LBTH, Commercial Road Conservation Area Character Appraisal and Management Guidelines (2008)
- BRE - Site Layout Planning for Daylight and Sunlight (2011)

## **7. PLANNING ISSUES**

7.1 The following key planning issues have been identified at the pre-application stage.

### **Land Use**

#### Estate regeneration

7.2 13 homes (2% of stock on the estate) are to be demolished. These are comprised of 4 x social rent homes and 9 leasehold homes. As such, policies relating to estate regeneration apply.

- 7.3 The Mayor's Good Practice Guide to Estate Regeneration (GPGER): Better Homes for Local People sets out principles for undertaking estate regeneration schemes. The key principles are:
- an increase in affordable housing, comprising like-for-like replacement and the maximisation of additional genuinely affordable housing;
  - full rights to return or remain for social tenants;
  - a fair deal for leaseholders, including home loss payments, and independent valuation for residents (paid by applicant);
  - full and transparent consultation, with identified direct engagement and consultation events;
- 7.4 The rehousing and phasing strategy is therefore based on the need to rehouse 4 tenants and a maximum of 6 leaseholders.
- 7.5 The development will take place in 4 phases. Block C will be last (Start Q2 2026 and Finish Q1 2028). Block C would be where the homes are currently located within Brayford Square. This means that all leaseholders and tenants can move into new accommodation within Block D (Start Q2 2024 and Finish Q2 2026) i.e. a single decant process.
- 7.6 In principle, it would appear that the scheme would increase the supply and quality of the affordable homes when assessed against The Mayor of London's "Better Homes for Local People – The Mayor's Good Practice Guide to Estate Regeneration" and Policy D.H2 (Affordable housing and housing mix) of the Local Plan. The Planning Statement submitted in support of the planning application will have to explore this in more detail to demonstrate full compliance with policy.

#### Non-residential floorspace

- 7.7 Community facilities that are currently located within Brayford Square are proposed to be re-provided and enhanced as part of the proposals.
- 7.8 Policy D.CF2 (Existing community facilities) of the Local Plan states, in part 2, that where community facilities are re-provided on site as part of the development, the quality and accessibility of these facilities (including public access) should be enhanced. Supporting text 12.17 states that, where practicable, the replacement facility should be provided before the existing facility ceases operation to ensure that local people continue to receive a high-quality service. If this is not the case, applicants must provide extensive detail of the decant strategy so the existing shops and other local services can continue to operate on site without disadvantage throughout the course of the construction. Therefore, it is considered that this aspect of the proposals could be acceptable subject to further details being provided.
- 7.9 Retail and food and drink uses are also proposed as part of the pre-application. Policy D.TC3 seeks to ensure that new retail units or extensions outside of designated town centres should not exceed 200 square metres to ensure that they are local in nature and do not harm the vitality and viability of existing centres. It is understood that the proposals would not introduce an individual units or extension of more than 200 metres. Policy D.TC5 seeks to ensure that cafes and restaurants outside of designated town centres do not undermine existing centres and are local in nature and scale.

#### **Housing**

- 7.10 Local Plan policies require at least 35% affordable housing to be provided in broad alignment with the Council’s prescribed housing mix as set out in the Local Plan. The London Plan requires the maximum reasonable amount, subject to viability, to be provided.
- 7.11 The applicant is proposing a 100% affordable housing scheme. 65% of the new homes will be provided as Shared Ownership whilst 35% will be affordable rent. Refinements to the housing mix are currently the subject of further discussion with the applicant.
- 7.12 The last iteration of the scheme proposed 228 homes, to be provided as per Table 1.

**Table 1: Scheme Unit Mix**

	S/O	%	Local Plan	Aff Rent	%	Local Plan
<b>1 Bed</b>	58	39%	15%	30	38%	25%
<b>2 Bed</b>	60	41%	40%	26	33%	30%
<b>3 Bed</b>	28	19%	45%	17	21%	30%
<b>4 Bed</b>	2	1%		4	5%	15%
<b>5 Bed</b>		0%		3	4%	
<b>subtotal</b>	148			80		
<b>%</b>	65%			35%		

- 7.13 It is noted that there is a significant overprovision of 1-bedroom homes against usual policy targets.

## Heritage & Design

**Figure 3: Proposed Commercial Road Elevation**



- 7.14 Planning policies requires high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.
- 7.15 The design of the scheme has evolved throughout the pre-application meetings with officers and following CADAP on 11<sup>th</sup> November 2020. The majority of the plots front Commercial Road apart from proposed Building C, at the centre of the proposals, which is informed by the axis of the to be demolished Brayford Square Buildings (see Figure 4).

**Figure 4: Proposed Landscaping Plan**



- 7.16 As can be seen in Figure 4, the proposals would see the existing open space redistributed so that a more cohesive open space and landscaping approach can be adopted. 'Adventure' streets will run east-west behind the building fronting Commercial Road for child play opportunities. A MUGA, to replace the existing hardstanding MUGA, will occupy a double height space at the ground floor of Building D which will be accessible from the eastern adventure street. Green spaces in between existing estate buildings are proposed to be enhanced to facilitate play, communal gatherings, and quiet enjoyment.
- 7.17 The height of the buildings along Commercial Road has been reduced to predominantly 6 storeys with two taller, 9-storey buildings marking the gateway to the site and responding to the buildings on the south side of Commercial Road. The articulation and composition of the proposed buildings seeks to replicate the vertical rhythm of the Victorian buildings through the introduction of more bays. Though the proposed buildings are very long this is broken with a vertical emphasis and rhythm which reflects the rhythm of the historic terraces.
- 7.18 Also, within the red line boundary is the former Stepney's nightclub which used to form part of the adjacent George Tavern (Grade II Listed) at the junction of Commercial Road and Jubilee Street. The application proposes to construct a three-storey building here to provide space for a community theatre. An indicative image is shown in Figure 5.

**Figure 5: Proposed Building A (Former Stepney's Nightclub)**



### Neighbouring Amenity

- 7.19 Planning policy seeks to protect and where possible improve the amenity of surrounding neighbouring properties and provide a good standard of amenity for all future occupants of development proposals.
- 7.20 The full planning application will benefit from daylight, sunlight and overshadowing assessment in accordance with policy D.DH8 (Amenity) of the Local Plan which states that these must accompany all major planning applications and/or smaller schemes where adverse effects on daylight and sunlight levels are anticipated. It should follow the methodology set out in the most recent version of Building Research Establishment's 'Site layout planning for daylight and sunlight' guidance (2011) and the British Standard Code of Practice for daylighting, the results of which must be submitted with the planning application.
- 7.21 Table 1 sets out the LBTH numerical classifications that are required to be applied for Negligible, Minor Adverse, Moderate Adverse and Major Adverse bandings for daylight (VSC & NSL) and sunlight (APSH & WPSH).

**Table 1: Classifications for reductions in daylight and sunlight**

<b>Reduction to daylight (VSC &amp; NSL) and sunlight (APSH &amp; WPSH)</b>	<b>Effect classification</b>
0 - 20% reduction	Negligible effect
20.1% - 30% reduction	Minor adverse effect
30.1% - 40% reduction	Moderate adverse effect
Above 40% reduction	Major adverse effect

- 7.22 Initial studies have been undertaken to assess the impact the proposed development would have on the daylight of surrounding occupiers.
- 7.23 In terms of VSC the initial assessments undertaken show that 70% of the windows surrounding the proposed development will satisfy the BRE Guidelines. The remaining windows can be classified as follows:

- 77 windows would experience a minor adverse effect
- 60 windows would experience a moderate adverse effect
- 26 windows would experience a major adverse effect

7.24 In terms of NSL, a daylight distribution analysis has been completed and demonstrates that 361 out of 373 (97%) rooms will satisfy the BRE Guidelines. The remaining rooms can be classified as follows:

- 5 rooms would experience a minor adverse effect
- 2 rooms would experience a moderate adverse effect
- 5 properties would experience a major adverse effect

7.25 In terms of sunlight and overshadowing to open/private amenity space, no detailed results have been presented. This will accompany the full planning application in addition to the assessment for the proposed new homes.

### **Transport and Servicing**

7.26 Planning policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.

7.27 The site is in an area of PTAL (Public Transport Access Level) 5-6a, on a scale of 0-6b where 6b represents the highest level of public transport connectivity.

7.28 The applicant has stated that the cycle parking requirements in the London Plan and Local Plan will be fully adhered to. The correct quantum, location, and design of the long and short-stay cycle parking requirements will be supplied across the scheme. LBTH Highways Officers have expressed a preference for as close to a 50:50 ratio as possible in terms of Sheffield stand and two-tier long-stay cycle parking format in the scheme.

7.29 There are currently 44 private permit holder parking spaces on Exmouth Street and Summercourt Road, plus other areas of informal parking on garage forecourts. This amounts to some 62 total parking opportunities within this part of the Exmouth Estate. 21 of these existing parking spaces are to be re-provided to meet existing demand.

7.30 Disabled persons parking is proposed at 10% from the outset for the homes in line with policy. TfL have advised that these spaces should be located to minimise the distance between the building entrance/facility they are associated with. The applicant has noted this requirement.

### **Environment**

7.31 Planning policies seek to secure a range of sustainable development outcomes including net biodiversity gains whilst not impacting on existing protected species; the implementation of efficient energy systems which seek to minimise carbon emissions and to secure effective strategies for addressing matters relating to contaminated land and sustainable urban drainage.

7.32 The proposals are targeting carbon neutrality by 2050. Furthermore, although not set out in detail at this stage, the proposals should enhance biodiversity value and contribute towards the Local Biodiversity Action Plan (LBAP).

7.33 The proposals do not constitute Environmental Impact Assessment (EIA) development.

**Infrastructure Impact**

7.34 The proposed development will be liable to the Council's and the Mayor of London Community Infrastructure Levies (CIL) and planning obligations to be secured under Section 106 of the Town and Country Planning Act 1990 (as amended).

**8. RECOMMENDATION**

8.1 The Committee notes the contents of the report and pre-application presentation.

8.2 The Committee is invited to comment on the issues identified and to raise any other planning and design issues or material considerations that the developer should take into account at the pre-application stage, prior to submitting a planning application.

9. APPENDIX – IMAGES

Figure 6: Proposed Block B



Figure 7: Proposed Block C



**Figure 8: Proposed Block D**

