



STRATEGIC DEVELOPMENT COMMITTEE

20/04/2021

Report of the Corporate Director of Place

Classification: Unrestricted

Application for Planning Permission

[click here for case file](#)

Reference	PA/20/00557
Site	Land bounded by 2-10 Bethnal Green Road, 1-5 Chance Street (Huntingdon Industrial Estate) and 30-32 Redchurch Street,
Ward	Weavers
Proposal	<p>Demolition of the existing buildings, excluding the façade of 30-32 Redchurch Street, and redevelopment to provide a mixed-use development within a single building rising to three, seven and nine storeys maximum AOD height circa 56m comprising office (up to 14,393 sqm of B1(a)) floorspace, up to 1,444 sqm flexible commercial floorspace (B1(a)/B1(c)), and up to 1,181 sqm flexible retail floorspace (Use Class A1 and A3) along with servicing facilities, cycle parking, vehicle parking and associated works.</p> <p>This application is accompanied by an Environmental Statement</p>
Summary Recommendation	Grant Planning Permission subject to conditions
Applicant	UKI (Shoreditch) Limited
Architect/agent	DP9 Limited
Case Officer	Tanveer Rahman
Key dates	<p>Application validated 29/05/2020 Public consultation finished on 10/04/2021</p>

EXECUTIVE SUMMARY

This mixed-use but predominately office-led scheme provides an opportunity to redevelop an underutilised and to a degree somewhat visually unsightly site through a development that offers the prospect of delivering 1,143 FTE jobs (estimates are that as existing 164 FTE jobs can be provided on site), plus a proportion of flexible use retail space at the ground floor, as well as provision of affordable workspace. The scheme would activate, animate and enhance the street scenes of Bethnal Green Road, Chance Street and Ebor Street that presently benefit only from architecturally undistinguished buildings marked with a series of service yards and related entries and a large length of blank wall facing Bethnal Green Road that is regularly graffitied.

The proposal would constitute a tall building and would not be within one of the Borough's designated Tall Building Zones where tall buildings are generally directed. However, it is considered that having regard to both the previous consent given for an overall taller 2 - 14-storey building on-site and with regard to the scale and height of development consented on the Bishopsgate Goodsynd site on the south side of Bethnal Green Road, Officers conclude it is not tenable to sustain an objection to the principle of a tall building of this massing and height at this site location.

The proposal takes the opportunity to optimise development on the site and employment opportunities informed by the massing of the previous scheme consented (albeit now lapsed) for the site (PA/13/01638) which was granted on Appeal. The architectural approach and massing are well-considered, bespoke to the site in terms of the approach to the handling of the facades to the different street elevations.

The architectural approach and massing are significantly more sensitive and responsive to the individual street scene contexts than the previous scheme and more sympathetic to the setting of neighbouring individual heritage assets and to surrounding Conservation Areas.

The proposed development would result in some limited harm to designated heritage assets, to which great weight is attached. This is to the Redchurch Street Conservation Area, the South Shoreditch Conservation Area and the Grade II listed public house at 34 Redchurch Street. The degree of harm to heritage assets is considered less than substantial and this harm is outweighed by the public benefits of the development.

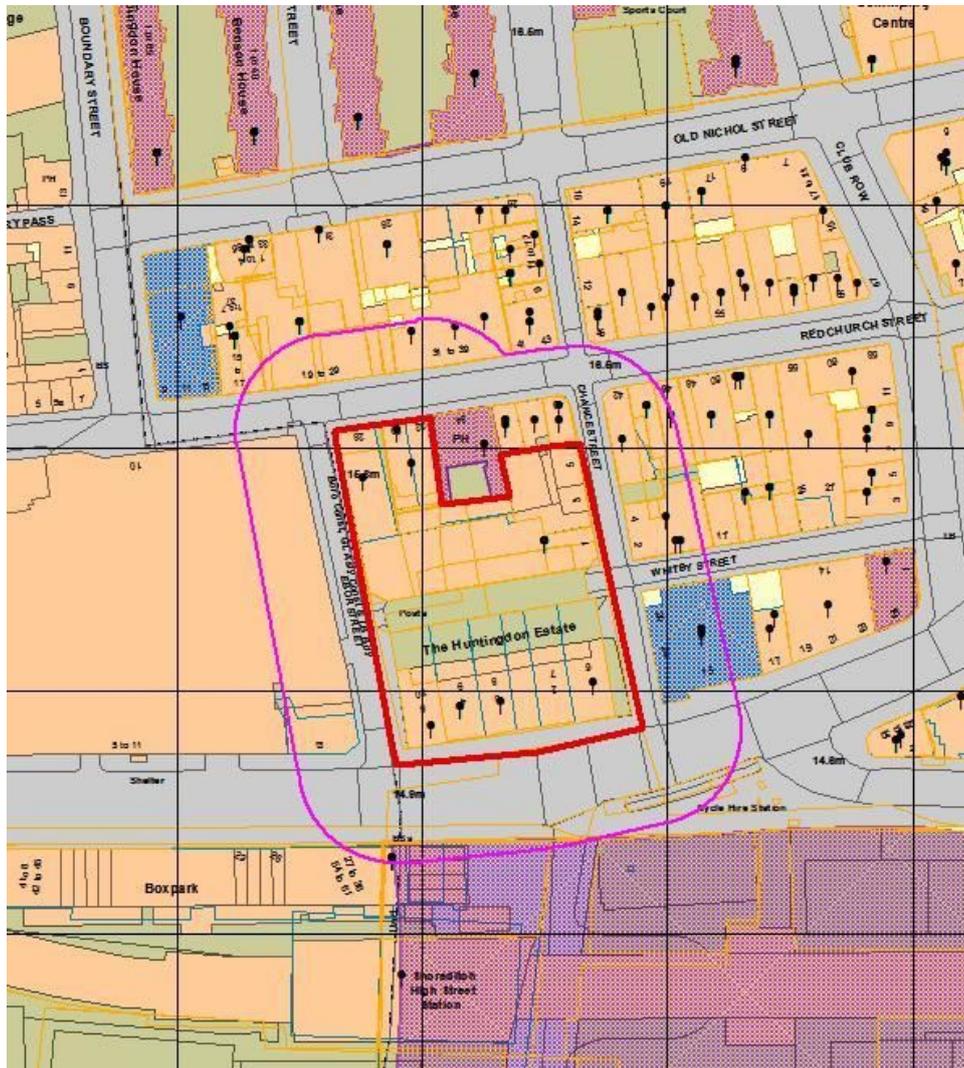
There would be some impacts to the amenity of neighbouring occupants to the site with respect to daylight/sunlight, sense of enclosure and privacy. However, these impacts are considered acceptable in the context of this site, the site history and the range and scale of public benefits that would follow from this redevelopment and regeneration of the site.

With respect to highways and vehicular delivery arrangements the scheme raises no concerns and the cycle provision complies with London Plan standards.

The scheme is also consistent with development policies in respect of matters of energy, sustainability and biodiversity.

Overall, the development is considered to comply with relevant Development Plan policies and approval is recommended.

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 	<h2>Planning Applications Site Map PA/20/00557</h2> <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: 12 April 2021</p>

1 SITE AND SURROUNDINGS

- 1.1 The application site consists of 2-10 Bethnal Green Road, Units 1-10 The Huntingdon Estate, 1-5 Chance Street and 28-32 Redchurch Street. For the purposes of this report it will be referred to as 'the site'.
- 1.2 The site measures 0.28 hectares in area and is in the Weavers Ward, at the western edge of the Borough. It is bounded to the west by Ebor Street which is in the London Borough of Hackney. The site can be accessed from all four streets that bound it.
- 1.3 2-10 Bethnal Green Road is two - storey industrial style building and set along the south of the site. To the north of this is the site's servicing yard. Vehicular access to the yard is from Ebor Street and egress from it is onto Chance Street. Units 1-10, 1-5 Chance Street and 28-32 Redchurch Street are all also two storeys but are set higher due to the slope of the site down from north to south.

Figure 1: Aerial view of the site (Source: Google Maps)



Figure 2: Birdseye view from the south (Source: Bing Maps)



Figure 3: Birdseye view from the north (Source: Bing Maps)



- 1.4 The site currently consists of units in cultural and commercial use and contains 2,969sqm NIA of floorspace.
- 1.5 The northern section of the site is in the Redchurch Street Conservation Area and the entire site is in the Shoreditch Tier 2 Archaeological Priority Area. None of the buildings on site are statutory or locally listed. However, The Owl & Pussycat public house (34 Redchurch Street) which is a Grade II listed building adjoins the site to the north.
- 1.6 The South Shoreditch Conservation Area is opposite the site to the west, in the London Borough of Hackney. The Boundary Estate Conservation Area lies to the north of the site and Fournier Street Conservation Area is to the south east, both are located in Tower Hamlets and these Conservation Areas are approximately 45m and 60m respectively from the site at their closest points.

- 1.7 Statutory listed buildings close to the site are the forecourt wall and gates to Old Bishopsgate Goods Station to the south east, Braithwaite Viaduct to the south, 25 Bethnal Green Road/1 Club Row to the east, 3 & 5 Club Row with 31 Whitby Street to the east, three posts on Boundary Pass to the north west, iron railings gate and piers between Laleham House and Hedsor House to the north, individual blocks with the Boundary Estate to the north and 180-182, 187 -191 and 196 Shoreditch High Street to the west. All of these buildings are Grade II listed.
- 1.8 The nearest locally listed building are 15 Bethnal Green Road to the south east and 9-13 Redchurch Street to the north west. The Tea & Biscuit Building (occupying the corner of Bethnal Green Road and Shoreditch High Street) is designated as a building of townscape merit within LB Hackney's *South Shoreditch Conservation Area Appraisal* (2009).
- 1.9 The site is in the Central Activities Zone (CAZ), the designated City Fringe Opportunity Area, a Borough Secondary Preferred Office Location (POL), London View Management Framework 8A.1, the Green Grid Buffer Zone and an identified area of sub-standard air quality.
- 1.10 The two urban blocks immediately east of the site consist of buildings ranging from one to six storeys in height, which are predominately of commercial and residential uses.
- 1.11 The urban block to the west consists of the seven to nine storey Tea & Biscuit Building which contains a mix of commercial units; as well as the four to six storey Shoreditch House Hotel.
- 1.12 The urban block to the north consists of buildings ranging from two to six storeys in height, which are mainly retail and residential uses; as well as a hotel.
- 1.13 To the south is the former Bishopsgate Goodsyards site which is currently occupied by Boxpark and Powerleague. This site recently benefited from a resolution to grant consent from the Mayor of London for a mixed use scheme involving erection of ten buildings ranging from 1 - 49 storeys and containing up to 30,940sqm of office space, up to 500 new homes and 18,390 sqm flexible use retail space amongst other uses and purposes.
- 1.14 Notable existing tall buildings in the immediate vicinity include the 25-storey Avant-Garde Apartments approximately 60m to the east of the site on the south side of Bethnal Green Road and Sclater Street and the 50-storey Principal Tower approximately 300m to the south west on Shoreditch High Street.
- 1.15 There are bus stops approximately 50m south west of site and a cycle hire dock approximately 25m south east of the site, both along Bethnal Green Road.
- 1.16 Bethnal Green Road is in the Major Roads Consultation Network and the London Cycle Network runs along Chance St to the east of the site. Shoreditch High Street Overground Station is just over 60m south of the site.

2. PROPOSAL

- 2.1 The application proposes to demolish all existing buildings on the site, except for the façade of 30 - 32 Redchurch Street, and erect a single building ranging from three to nine storeys in height, as well as two levels of basement accommodation.

Figure 4: Proposed isometric view from the north east (Source: Design & access statement)

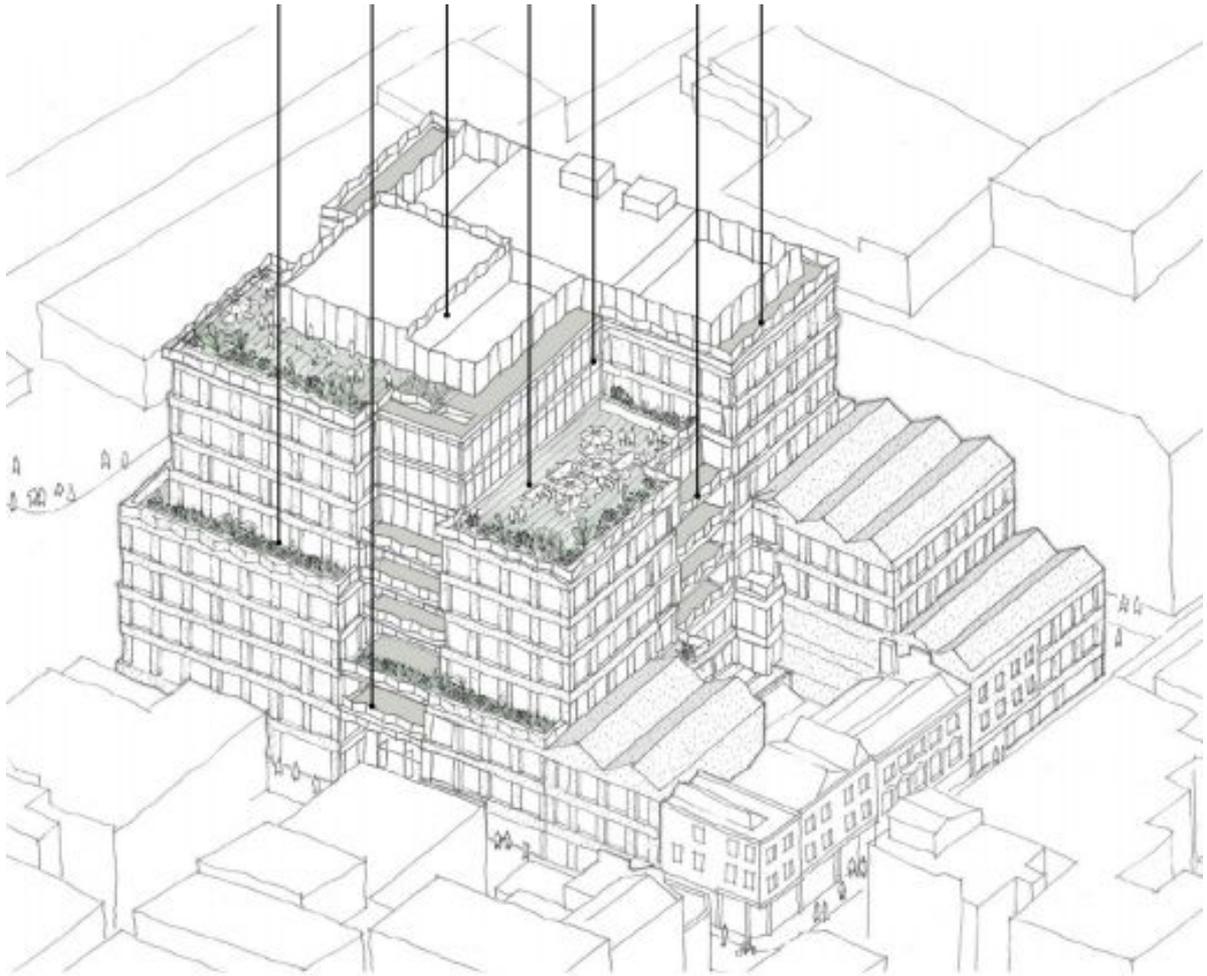


Figure 5: Verified CGI view of the proposed scheme from the south on Braithwaite Street (Source: Townscape, Heritage & Visual Impact Assessment)



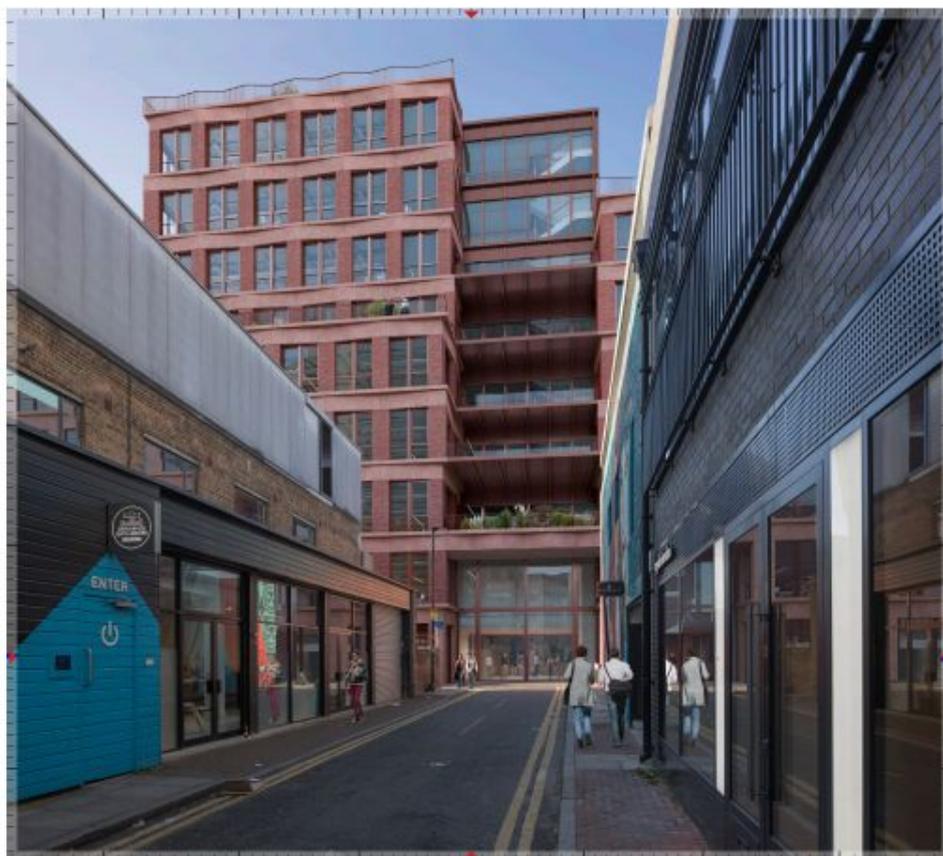
Figure 6: Verified CGI view of the proposed scheme from the south east on Bethnal Green Road (Source: Townscape, Heritage & Visual Impact Assessment)



Figure 7: Verified CGI view of the proposed scheme from the north east on Chance Street (Source: Townscape, Heritage & Visual Impact Assessment)



Figure 8: Verified CGI view of the proposed scheme from the east on Whitby Street (Source: Townscape, Heritage & Visual Impact Assessment)



- 2.2 The proposed uses are affordable B1a/B1c (offices and industrial processes) workspace, B1a (office), A1 (retail) and flexible A1/A3 (retail/café and restaurant).
- 2.3 The affordable workspace would be spread over the ground and first basement levels. There would be two flexible units on the ground floor and one retail unit spread over the ground and first basement levels. The floors above would consist of office space.
- 2.4 The second lower basement level would contain refuse stores and plant rooms. The first basement level would contain changing rooms to serve cyclists and a secure cycle storage area. The ground floor would contain the office reception area; as well as a vehicular loading bay and disabled parking bay for the development as a whole which would be accessed from Ebor Street.

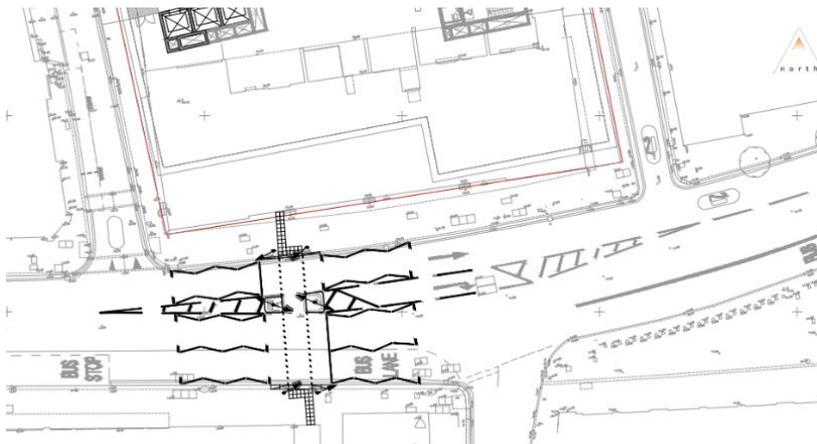
Figure 9: Proposed floorspace

Use	GIA	GEA
B1a/B1c	1,444sqm	1,576sqm
A1	567sqm	661sqm
A1/A3	614sqm	666sqm
B1a	14,393sqm	15,738 sqm
Plant	1,897sqm	2,237 sqm
Back of house	2,121sqm	2,136 sqm
Total	21,036sqm	23,014sqm

- 2.5 There would be a primary core at the western part of the building and a secondary core at the eastern part of the building.

- 2.6 The primary entrance into the building would be from Bethnal Green Road with a secondary cycle/tenant entrance from Chance Street. There would also be escape stairs leading to Redchurch Street and Chance Street.
- 2.7 There would be a direct entrance into the affordable workspace from Chance Street. There would be a direct entrance to the retail unit from Ebor Street and Chance Street. There would be a direct entrance to the flexible 'Unit 1' from Bethnal Green Road and there would be a direct entrance to the flexible 'Unit 2' from Bethnal Green Road and Chance Street
- 2.8 The office space at first to eighth floor levels would all have areas of outdoor amenity space. This would consist of loggias on all of these floors and terraces on the third, fifth and seventh and floors.
- 2.9 The ninth floor would also have a terrace; as well as plant and lift and escape stair overruns.
- 2.10 The application also proposes a controlled pedestrian crossing approximately 120m west of the site on Bethnal Green Road, close to the Shoreditch High Street junction. The aim of this is to provide a safe pedestrian walking route towards the centre of Shoreditch. All crossing points would include dropped kerbs and tactile paving.

Figure 10: Proposed pedestrian crossing (Sources: Transport Statement and Transport Assessment)



3 RELEVANT PLANNING HISTORY

Application site

- 3.1 **PA/19/00294:** Request for an Environmental Impact Assessment Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for redevelopment to provide an office-led mixed-use development comprising approximately 17,000 sqm (GEA) office floorspace (Use Class B1(a)) and 5,500 sqm (GEA) of flexible ground and lower ground floorspace (Use Class A1, A3 and B1(a)), with associated plant and cycle parking in a building ranging from 2 to 10 storeys above ground with two levels of basement. Scoping Opinion Issued 07.03.2019
- 3.2 **PA/16/01099:** Application to modify a S106 Agreement for Huntingdon Industrial Estate site, in relation to planning permission ref PA/13/01638, dated 19/03/2014. No Further action 25.08.2017
- 3.3 **PA/13/01644:** Demolition of 1-5 Chance Street and 28 and 30-32 Redchurch Street in conjunction with the comprehensive redevelopment of the Huntingdon Estate site to provide

a mixed-use development. Refused 19.03.2014 & Appeal (APP/E5900/E/14/2225594) allowed 05.08.2015

- 3.4 **PA/13/01638:** Demolition and redevelopment to provide a mixed-use development comprising two basement floors and between 2 - 14 storeys. The proposal provides 78 residential units (Use Class C3), 456 sqm Class A1, 359 sqm Class A1/B1/D2 and 1,131 sqm A1/A3/A4/D2 at basement and ground floor; parking, plant and ancillary accommodation; a central courtyard and accessible amenity roof terraces. *This application is linked to PA/13/01637 (Land at Fleet Street Hill) a concurrent planning application and an Environmental Assessment is submitted for both applications. Refused 19.03.2014 and Appeal (APP/E5900/A/14/2225592) allowed 05.08.2015
- 3.5 **PA/11/00461:** Demolition of buildings at 1-5 Chance Street & 28 Redchurch Street to enable the redevelopment of the Huntingdon Estate site by erection of a building from 1 to 25 storeys in height plus basements to provide 116 residential units with retail, restaurant/cafe, office, community and leisure floorspace (see associated planning application reference PA/11/00460). Withdrawn 21.11.2011
- 3.6 **PA/11/00460:** Demolition of existing buildings (and those at 1-5 Chance Street and 28 Redchurch Street) and redevelopment of site by the erection of a building from 1 to 25 storeys in height plus two basement levels. The proposed development comprises 116 residential units (Use Class C3), retail (Use Class A1), cafe/restaurant (Use Class A3), office (Use Class B1), community/education (Use Class D1) and assembly and leisure (Use Class D2) floor space at basement, ground and first floor levels; together with parking and plant at basement level plant; roof gardens at first floor level and associated landscaping across site. Withdrawn 21.11.2011
- 3.7 **PA/08/02409:** Request for Scoping Opinion as to the information to be contained within an Environmental Impact Assessment to be submitted in support of an application for development between four and 12 storeys to provide 150 residential and serviced apartments together with retail and commercial floorspace and car parking. Scoping Opinion Issued 16.12.2008

1 - 5 Chance Street and 28 Redchurch Street

- 3.8 **PA/12/00724:** Dual use of ground floor for either D1 (gallery, exhibition space) or B2 (general industrial) purposes. Permitted 08.06.2012
- 3.9 **PA/10/02421:** Continued temporary use of ground floor for gallery and associated uses within Use Class D1 (Non-Residential Institutions). Permitted 21.12.2010
- 3.10 **PA/09/00884:** Use of the ground floor as an art gallery and exhibition space for a further temporary period of 15 months. Permitted 31.07.2009

34 Redchurch Street (The Owl & Pussycat public house)

- 3.11 **PA/20/02716:** Conversion of existing rear window to french doors, internal alterations to listed building. Listed building consent granted 01.04.2021
- 3.12 **PA/20/02715:** Conversion of existing rear window to french doors, internal alterations to listed building. Permitted 01.04.2021
- 3.13 **PA/19/00033:** Remedial works to strengthen and repair cracking between front wall and party walls at first and second floor. Permitted 04.03.2019

- 3.14 **PA/08/00017:** General refurbishment of existing licensed premises including construction of extension to rear of premises. Permitted 23.05.2008
- 3.15 **PA/15/00782:** Internal and external refurbishment and repair works. Demolition of the internal wall to extend the men's toilets. Erection of a canopy over the rear courtyard. Permitted 29.05.2015
- 3.16 **PA/15/00781:** Internal and external refurbishment and repair works. Demolition of the internal wall to extend the men's toilets. Erection of a canopy over the rear courtyard. Permitted 29.05.2015
- 3.17 **PA/10/00231:** External repairs and redecorations including internal refurbishment and alteration works. Permitted 28.04.2010
- 3.18 **PA/08/00018:** General refurbishment of existing licensed premises including construction of extension to rear of premises. Permitted 23.05.2008

38 Redchurch Street

- 3.19 **PA/01/00106:** Part demolition of rear wall and extension of office into covered yard. Roofing of remaining yard to improve toilet facilities. Permitted 22.02.2001

Bishopsgate Goods Yard

- 3.20 **PA/14/02011:** An OUTLINE application for the comprehensive mixed use redevelopment of the site comprising (floorspace in Gross Internal Area): Residential (Class C3) comprising up to 500 residential units; Business Use (Class B1) up to 130,940 sq.m.; Hotel (Class C1) up to 11,013 sq.m.; Retail, financial & professional services, restaurants, cafes & hot food takeaways (Class A1, A2, A3, A5) up to 18,390 sq.m. of which only 3,678 sq.m. can be used as Class A5; Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) up to 6,363 sq.m.; Public conveniences (sui generis) up to 298 m²; Basement, ancillary and plant up to 21,216 sq.m. Formation of new pedestrian and vehicular access; means of access, circulation and car parking within the site and provision of new public open space and landscaping. The application proposes a total of 10 buildings that range in height, with the highest being 142.4m AOD and the lowest being 29.2m AOD. With all matters reserved save that FULL DETAILS for Plot 2 are submitted for alterations to, and the partial removal of, existing structures on site and the erection of a building for office (Class B1) and retail use (Class A1, A2, A3, A5) comprising a part 17/ part 29 storey building; and Plot 7 comprising the use of the ground level of the Braithwaite Viaduct for retail and food & drink uses (A1, A2, A3, A5) and works to and use of the Oriel and adjoining structures for retail and food & drink uses (A1, A2, A3, A5). (Amended Description). For that part of the site within the London Borough of Tower Hamlets, the proposed development comprises the following: Up to 44,067 sq.m. of residential use (Class C3); up to 21,341 sq.m. of Business Use (Class B1); up to 11,013 sq.m. of Hotel Use (Class C1); up to 13,881 sq.m. of Retail Use (Class A1, A2, A3, A5) of which only 2,776 sq.m. can be used for hot food takeaways (A5); Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) ? up to 4,109 sq.m.; up to 298 sq.m. of sui generis use; up to 8,464 sq.m. of ancillary and plant space. This application is accompanied by an Environmental Statement. Mayor of London resolved to grant subject to a S106 legal agreement 03.12.2020

4 PUBLICITY AND ENGAGEMENT

- 4.1 68 neighbour notification letters were sent to nearby properties, as per the site plan at the beginning of this report.

4.2 A press notice was published on June 11th 2020 and a site notice was displayed next to the application site on June 13th 2020. A further press notice (for an EIA Regulation 25 consultation) was published on March 11th 2021

4.3 10 letters of representations (including a letter on behalf of CAMRA) were received. All letters raised concerns, although some letters contained support for some elements of the proposal. The comments can be summarised as follows:

4.4 Land use/ principle of development

Support

- No opposition to the principle of redeveloping the industrial estate which could contribute more to the local area.

Objections

- The proposed units would be highly commercial and less independent in nature to the area. Therefore, existing businesses on Redchurch Street would find it difficult to compete with them, especially during this difficult period.
- Independent boutiques are the reason people visit this part of Shoreditch, so reducing the affordability of the area for them would be detrimental to Redchurch Street.
- The community of Arnold Circus and the Boundary Estate would be undermined by the influx of a more commercial business model to the area.
- Affordable housing rather than office space is required.

4.5 Heritage & design

Support

- The latest proposals are much better than the earlier ones, in terms of height and size.

Objections

- Despite amendments since the previous application, the height and breadth of the building is incongruous with the character of the Conservation Area and the local area.
- The proposal has a much “blockier” appearance with increased massing towards Bethnal Green Road than the scheme approved on site in 2015. The current scheme proposes only a minor setback and does not respect the height of the buildings to the west and east.
- The Tea & Biscuit Building embodies the character of the area and should be used as a benchmark for the maximum height.
- The height and massing facing Bethnal Green Road appears to be three storeys higher than surrounding buildings.
- Redchurch Street is narrow with many small independent shops. A 9-storey development would be out of keeping with the character and culture of this street.
- A more thorough evaluation of the potential impact on the look and feel of the tight-knit street pattern of low-rise buildings in the Redchurch Street Conservation Area should have been submitted.
- The proposed pink/red building with its saw-toothed roof seems to ignore all the precedents in the area which are either historic buildings or cube warehouse blocks.
- The scheme does not acknowledge the history of the area but in fact stampedes on it.
- It has attempted to acknowledge the Tea Building warehouse style by emulating it but it undermines this historic building, detracting from it and in fact blocking it from many sight lines across Shoreditch including views of The Tea & Biscuit Building.

- The Tea Building is identified as a building of townscape merit in the South Shoreditch Conservation Area Appraisal. It forms a local landmark on a prominent corner and will be adversely affected by the proposals.
- The building's detailing is out of keeping with the local area.
- The proposal would damage the heritage of the area.
- It could be designed in a more sensitive manner.
- Further long and short views of the proposal along Redchurch Street should be provided.
- The Owl & Pussycat has historically been a pub use. There has been no analysis of the threat to the viability of the business and therefore harm to the heritage asset.

4.6 Neighbouring amenity

Objections

Towards Redchurch Street

- Concerns about overlooking. Glazing is usually obscurely glazed or angled to mitigate against this.
- Light levels received by neighbours would be impacted.
- Concerns about noise from lorries and other construction works, especially as more people are now working from home.
- The planning department should consider requesting a daylight/sunlight report to assess the cumulative impact of the proposal with the consented Bishopsgate Goodsynd scheme on neighbours, as recommended by BRE guidance.

Towards Shoreditch House

- The light levels to its existing rooftop terrace and hotel rooms at would be severely impacted and is concerning.
- Paragraph 13.168 of the Environmental Statement states that none of the 12 rooms assessed will meet both VSC and NSL criteria. Paragraph 13.170 states that 15 windows will experience an alteration in VSC in excess of 40%, which is considered a major adverse effect and 5 of these windows retain VSC levels of less than 10%.
- Shoreditch House is a private members club so privacy is important. The windows and terraces in the proposed building would create overlooking issues. The proposed 7th floor terrace in particular would be in close proximity to its existing rooftop terrace. This relationship needs to be carefully considered and adequate screening proposed.
- The Environmental Statement also confirms that Shoreditch House will experience light trespass of approximately 7.5 lux, which is also concerning.
- Given the current pandemic, the al-fresco dining offering on the roof terrace is important. It is therefore vital that the noise impact on this area is considered in detail as part of any forthcoming Construction Management Plan

Towards the Owl & Pussycat public house

- Insufficient analysis of overshadowing to its outdoor space

4.7 Environmental

Objections

- The proposal could turn the streets in the Redchurch Street Conservation Area into "dark wind-tunnels".

4.8 Other

- 4 and 9 Chance Street are good examples of more appropriate low-rise redevelopment that also provides community space.
- The proposal is not helping any of Shoreditch's problems but is adding to them.
- Views of the city for residents on the south side of Redchurch Street would be blocked. (*Case Officer's note: A right to a view is not a material planning consideration.*)
- An objector was only recently made aware of the proposed development (*Case Officer's note: Consultation was carried out in line with the Council's Statement of Community Involvement.*)
- Officers and local Councillors have not engaged with a neighbouring property to the extent that they would have liked.
- The East London & City Branch of the Campaign for Real Ale (CAMRA) is very concerned about the future viability of The Owl & Pussycat.

5 **CONSULTATION RESPONSES**

Internal consultees

LBTH Planning Policy

5.1 Comments are incorporated within the 'Land use' section of this report.

LBTH Place Shaping

5.2 Comments are incorporated within the 'Design and Heritage' section of this report.

LBTH CIL

5.3 The proposal 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.

5.4 The actual amount of CIL can only be confirmed once all relevant details are approved and any relief claimed.

5.5 The site is in the borough's Zone 1 and City Fringe charging areas. It also falls within Band 2 and Central London MCIL2 charging areas.

5.6 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 the CIL Team to demonstrate all or any part of the building was used lawfully for six continuous months of three years previous to planning approval. Detailed floorplans must also be provided for the CIL Team to validate.

LBTH Health Impact Assessment (HIA) Officer

5.7 The scale of the proposal makes it referable to the GLA so a detailed HIA is required, as per policy D.SG3 of the Local Plan. This does not appear to have been submitted as a standalone document or within the original or updated Environmental Statement.

5.8 (*Case Officer's note: These comments will be addressed in 'Health Impact Assessment' section of this report.*)

LBTH Environmental Impact Assessment (EIA) Officer

- 5.9 The EIA has been reviewed by competent professionals and found sound subject to the mitigation measures identified within the Council's Final Review Report being secured by means of planning conditions and s106 planning obligations as part of any forthcoming consent.
- 5.10 *(Case Officer's note: These comments will be addressed in addressed further in the 'EIA' section of this report.)*

LBTH Environmental Health - Noise & Vibration

- 5.11 No objection subject to a condition to manage demolition and construction activities and a condition requiring details of mechanical plant.
- 5.12 No adverse comments on the Environmental Statement.

LBTH Environmental Health - Odours

- 5.13 Following a review of the air quality assessment of the Environmental Statement requested calcification as to: 1) Why 1 diffusion tube monitoring was used given that DEFRA technical guidance LAQM (16) recommends using a combination of continuous and diffusion tube monitoring 2) Justification as to why the air quality neutral assessment (Transport Emission) estimates 12 trips per day for retail, café and restaurant because this appears a bit low.
- 5.14 *(Case Officer's note: This was subsequently reviewed and then deemed as acceptable by the Council's external consultant.)*
- 5.15 Recommended the following conditions:

- Demolition/Construction Environmental Management & Logistics Plan.
- Any non-road mobile machinery (NRMM) used not to exceed the emission standards set out in the Mayor of London's 'Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance 2014 and registration under the Greater London Authority NRMM scheme.
- Details of kitchen extract units for commercial uses where necessary.

LBTH Environmental Health - Contamination

- 5.16 No objection subject to a condition requiring details identifying the extent of the contamination and the measures to be taken to avoid risk to the public, buildings and environment when the site is developed.

LBTH Environmental Health - Air Quality

- 5.17 No objection subject to the following conditions:
- Construction / Demolition Site Dust Control.
 - Air Quality Standards for Boilers and CHP Units.
 - Kitchen Extract Standards for Commercial Uses. *(Case Officer's note: this was also requested by LBTH Environmental Health - Odours)*
 - Construction Plant and Machinery (NRMM) details.
 - PM 10 monitoring if an acceptable AQDRA.

LBTH Building Control

5.18 No response received.

LBTH Growth & Economic Development

Recommended planning obligations

- 5.19 The developer should exercise best endeavours to ensure that 20% of the construction phase workforce will be local residents of Tower Hamlets which the Economic Development Service will support by providing suitable candidates through the Workpath Job Brokerage Service.
- 5.20 20% of goods/services procured during the construction phase should be achieved by businesses in Tower Hamlets which the Economic Development Service will support by ensuring they work closely with the council's Enterprise team to access the approved list of local businesses.
- 5.21 A contribution of £68,032.00 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 is sought. This will be used to 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.
- 5.22 A contribution of £411,160.60 towards the training and development of unemployed residents in Tower Hamlets.
- 5.23 10 apprenticeships during the construction phase, at a minimum of Level 2.
- 5.24 An end use obligation to provide opportunities.

LBTH Biodiversity

5.25 No objection subject to a condition requiring biodiversity mitigation and enhancements.

LBTH Energy Efficiency/Sustainability

- 5.26 The current proposals have sought to implement energy efficiency measures and renewable energy technologies to deliver CO2 emission reductions.
- 5.27 The proposals meet the Local Plan target for anticipated on-site carbon emission reductions and are proposing a 48% reduction compared to the baseline (utilising SAP10 carbon factors). In order to support the scheme the residual CO2 emissions should be offset through a carbon offsetting contribution of £363,758.04 to deliver a policy compliant net zero carbon development.
- 5.28 Also recommended the following conditions:
- Final BREEAM Certificate to demonstrate 'Excellent' rating.
 - Post construction energy assessment including 'as built' calculations to demonstrate the reduction in CO2 emissions have been delivered on-site
 - 'Be seen' energy monitoring details as set out in GLA guidance including a commitment the development will be designed to enable post construction monitoring.

LBTH Sustainable Drainage Systems

5.29 Comments are incorporated within the 'Flood risk and drainage' section of this report.

LBTH Waste Policy & Development (WP&D)

5.30 The Delivery and Servicing strategy states deliveries will be from 06.30 - 08.00. There are concerns with noise nuisance particularly within built up areas. Waste Improvement does not allow waste operational services to make any waste collections before 07.00am. There are no exceptional circumstances to show that deliveries should be made before 07.00am.

5.31 The proposal is showing refuse collections to be made from the kerbside. This is not acceptable for this development as sufficient space within the site should be provided for an internal management system. Waste Improvement will require the applicant to ensure that the bags / containers are brought to ground level on the day of collection. Any Containers / bags must be left at a suitable collection point away from the highway on land belonging to the development and within 10 metres of vehicle access.

5.32 *(Case Officer's note: Discussions on this matter are currently ongoing with the agent and the Committee will be updated with any progress made.)*

LBTH Transportation & Highways (T&H)

5.33 No objection subject to further details on the design of accessible cycle parking provision within the building and a Section 278 agreement to secure highway improvements.

5.34 Detailed comments are incorporated with the 'Transportation & Highways' section of this report.

Conservation & Design Advisory Panel (CADAP)

5.35 Prior to the submission of this application the applicant undertook six pre-application meetings with the LPA as well a CADAP meeting on February 11th 2019.

5.36 CADAP's feedback was issued on February 28th 2019 and made the following main points:

- Welcomed the research and attention to detail that informed the proposals
- Were keen that the initial concept, the cross-axes route through the building and the expression of four distinct building elements making up the overall mass, was not lost as the proposal develops and is refined.
- Were keen to ensure that the building mediates successfully with the lower scale of the Conservation Area in which part of it lies.
- The open and flexible ground floor retail and café/restaurant was acceptable.
- The scheme could better reference the combinations of materials and detailing in the surrounding context, particularly the adjacent Tea Building.

External consultees

National Grid

5.37 No objection but due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor is recommended to contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

National Amenities Society

5.38 No response received.

Network Rail

5.39 No response received.

Metropolitan Police Designing Out Crime Officer

5.40 Crime data within the security assessment (SA) is outdated. Disagree with SA conclusions that ASB from people entering the building will not be an issue. A Secured By Design Condition should be attached if permission is granted.

Greater London Authority

5.41 The Stage 1 report made the following comments:

Principle of development

The principle of redeveloping the site for an office led, mixed use scheme within the City Fringe Opportunity Area is strongly supported, subject to clarification on the quantum of existing industrial floorspace and the provision of replacement industrial floorspace.

Design and Heritage

The scale and massing of the development responds comfortably to the existing and emerging context. The proposal will result in less than substantial harm to heritage assets, which is outweighed by the public benefits of the scheme.

Transport

A revised trip generation assessment should be provided. A contribution is sought towards a cycle docking hire station. Cycle parking should be designed in line with the London Cycling Design Standards. Additional information should be provided on freight trips, and the Delivery and Servicing Plan revised.

Sustainable development

Further information on energy, water and urban greening is required.

5.42 No objection subject to a condition demonstrating that the proposed Photovoltaic layout has been maximised.

Historic England

5.43 No objection to the application on heritage grounds.

5.44 However, there would be some harm to the Redchurch Street Conservation Area which must be considered according to the historic environment provisions of the NPPF.

5.45 Little change would arise to the settings of other nearby heritage assets, but the cumulative harmful impacts on the significance of townscapes in conservation areas, their settings and the settings of listed buildings need to be actively managed.

Historic England Greater London Archaeological Advice Service (GLAAS)

- 5.46 The site is in an area of archaeological interest and the nationally important Neolithic finds from nearby Principal Place have raised the prehistoric potential of the site, to complement the possible Saxon and Roman remains and the evidence for the development of London's suburbs.
- 5.47 Having reviewed the proposal and at the Greater London Historic Environment Record, harm to archaeological remains could be caused. Therefore, field evaluation is needed to determine appropriate mitigation.
- 5.48 The NPPF envisages evaluation being undertaken prior to determination. However, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Thames Water (TW)

- 5.49 The proposed development is within 15m of a TW underground wastewater assets. Therefore, an informative should be added to any permission with a link to guidance on working near their assets
- 5.50 No objection to the impact on foul water and surface water infrastructure capacity.
- 5.51 Following initial investigations, TW has identified an inability of the existing water network infrastructure to accommodate the needs of the preproposal. TW have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and. Therefore, a condition is requested requiring details that all water network upgrades required to accommodate the additional flows to serve the development have been completed or a development and infrastructure phasing plan has been agreed with TW to allow development to be occupied.
- 5.52 The proposal is located within 5m of a strategic water main. TW do not permit the building over or construction within 5m of strategic water mains. Therefore, a condition is requested requiring details of how the developer intends to divert the asset/align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, whilst allowing unrestricted access at all times for the maintenance and repair of the asset during and after the construction works.
- 5.53 The proposal is located within 15m of a strategic water main. Therefore, a condition is requested requiring a piling method statement.
- 5.54 There are water mains crossing or close to the site development. TW do not permit the building over or construction within 3m of water mains. Therefore, the developer is advised to read the TW guide to diverting their pipes.

London Borough of Hackney

- 5.55 Three responses were received. The first two responses were received on July 26th 2020 and again on March 23rd 2021. These two responses made the same comments which are as follows:

“While there is an emerging context for taller buildings in the wider area, the more immediate area is moderate in height, generally 4-6 storeys. On Ebor Street, the western site boundary,

contain non-designated heritage assets of 13 Bethnal Green Road (3-4 storey shoulder) and The Tea Building (6-storeys). We consider the proposals to be too tall on the Bethnal Green Road side, and in particular on Ebor Street, on the edge of the South Shoreditch Conservation Area.

The 4-6 storey heritage assets are currently the tallest buildings on Ebor Street, which is a narrow street of just 8-10m width. The character of Ebor Street would change considerably to its detriment with building heights on the site more than tripling to 10 storeys. This would be overbearing and have a significant overshadowing effect, both on the street and the heritage assets.

It is considered that the proposed 10-storey building would harm the South Shoreditch Conservation Area, directly adjacent on Ebor Street. This harm is less than substantial, but at the upper end of the scale, because the height is increasing beyond the height of the tallest existing buildings in this context.

The proportions of the proposed building do not look well. The large block is neither a perimeter block or podium with a horizontal emphasis nor a slender tall building. Rather, it appears as a bulky mass that is nearly as tall as it is wide, with the top part of the building appearing quite heavy and oversized.

We believe that the height of the building should be reduced by at least one storey and the top floors further setback on all sides, in addition to the existing setbacks. The shoulder on Ebor Street should be no higher than 5 storeys. In order to further minimise the visual impact of height, the railings along roof terraces should be set back so that they are less visible from street level.”

5.56 A third response was received on March 31st 201 and made the following comments:

“Recommendation

Hackney Council objects to the application on conservation and design grounds.

Significance of Area and Buildings

The site includes the Huntingdon Industrial Estate, modern industrial buildings at 2-10 Bethnal Green Road and 1-5 Chance Street and historic buildings within the Redchurch Street Conservation Area at Numbers 30 and 32 Redchurch Street. The Huntingdon Industrial Estate is of no conservation or design interest. The buildings at 30 and 32 Redchurch Street are at least 19th century and may include fabric from the 18th century and are characteristic and typical of the Conservation Area.

The site is adjacent to the borough boundary with Hackney (to the west). The site is immediately adjacent to the Grade II listed Owl and Pussycat Public House (LEN: 1065080) listed as The Crown Public House. The site is in the setting of the South Shoreditch Conservation Area.

Analysis of the proposals

The proposed development is subject to the following conservation comments:

Demolition

- There is no objection to the demolition of 1 to 10 Bethnal Green Road (the Huntingdon Industrial Estate) or to the demolition of 3 and 5 Chance Street or 1 Chance Street/28 Redchurch Street. These are poor quality modern buildings which add little to the area.
- The substantial demolition of 30 and 32 Redchurch Street is subject to objection. These are characteristic and typical buildings in this Conservation Area and contribute positively to the character of the area and particularly to the historical coherence of the street scene in the block running from Ebor Street to Chance Street.

- Numbers 30 and 32 form bookends to the listed public house, in balance with the similar buildings to the east at Numbers 36 to 40 (even) Redchurch Street.
- It is noted that no adequate assessment is provided of the heritage significance of 30 and 32 Redchurch Street other than their facades.
- Facade retention is not an adequate conservation response to buildings in the way of development. The significance of the buildings (which is not addressed adequately) is not conserved. Facade retention and the supposed benefits associated with them often fail and the note on the submitted drawings “Further coordination required for retained facade condition” hardly inspires confidence, particularly in the absence of any relevant structural information with the submission, which does not demonstrate that the claimed retention is possible or will actually happen.

Setting

- The proposed building is monolithic in footprint and this is contrary to the fine grain of the Conservation Area in which it partially sits.
- The proposed building is of nine storeys, with an effective tenth storey for plant. This is too tall for the historic context.
- The proposed building will backdrop the listed pub at 34 Redchurch Street in a dramatic and harmful way.
- The proposed building will backdrop the unlisted buildings in the Redchurch Street Conservation Area at 30, 32, 36, 38 and 40 Redchurch Street in a dramatic and harmful way.
- The proposed building impacts the setting of the South Shoreditch Conservation Area (in Hackney). It is four storeys taller than the key Tea Building to the immediate west and this is harmful to the setting of this important building and therefore of the setting of the Conservation Area.

Conclusion

The London Borough of Tower Hamlets should determine the application in the light of the need to pay special regard to the setting of listed buildings (Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990) and with regard to NPPF and London Plan policies in relation to impacts on designated heritage assets and their settings. Hackney Council objects to the scheme on these grounds.”

- 5.57 (LBTH Case Officer’s note: LB Hackney’s original two responses stated that the proposed building would be up to 10 storeys. However, their third response clarifies that it would be 9 storeys with the plant appearing an ‘effective tenth storey’.)

Transport for London Land Use Planning (TFL)

- 5.58 Comments are contained in the ‘Transportation & Highways’ section of this report.

London Underground Infrastructure Protection

- 5.59 No objection.

Spitalfields Neighbourhood Planning Forum

- 5.60 No response received.

Spitalfields Society

- 5.61 No response received.

Environment Agency

5.62 No objection.

London Fire & Emergency Planning Authority

5.63 No response received.

Crossrail

5.64 Did not wish to comment.

Natural England

5.65 No objection.

6 RELEVANT PLANNING POLICIES AND DOCUMENTS

Adopted policy

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

6.2 The *National Planning Policy Framework* (2019), which the Development Plan needs to be in accordance with, sets out the Government's planning policies for England and how these should be applied and provides a framework within which locally prepared plans for housing and other development can be produced.

6.3 The purpose of the planning system is to contribute to the achievement of sustainable development which has the following three overarching objectives: economic, social and environmental.

6.4 The adopted Development Plan's key planning policies relevant to this application are:

	<i>The Tower Hamlets Local Plan 2031 (2020)</i>	<i>London Plan (2021)</i>
Land use	S.SG1, S.SG2, D.SG3, S.EMP1, D.EMP2, D.EMP3, D.EMP4, D.TC3, D.TC5	GG1, GG2, GG3, GG5, GG6, SD4, SD5, D2, E1, E2, E3, E4, E7, E9, HC4
Design	S.DH1, D.DH2, D.DH6, D.DH9, D.DH10	D3, D4, D5, D8, D9, D11, D12
Heritage	S.DH3, D.DH4	HC1
Neighbouring amenity	D.SG4, D.DH8, D.ES9	D14
Transport	S.TR1, D.TR2, D.TR3, D.TR4	T1, T2, T3, T4, T5, T6, T6.2, T6.3, T6.5, T7, T9
Waste	D.MW3	SI 7
Sustainability	S.ES1, D.ES2, D.ES5, D.ES6, D.ES7, D.ES8, D.ES10	D11, SI 1, SI 2, SI 4, SI 5, SI 13, SI 16
Biodiversity	D.ES3	G1, G5, G6
Contributions	D.SG5	D2, E11

6.5 Other legislation, policy and guidance documents relevant to the proposal are:

- National Planning Practice Guidance (last updated 2019)
- National Design Guide (2019)
- Planning (Listed Buildings and Conservation Areas) Act 1990
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017
- GLA City Fringe Opportunity Area Planning Framework (2015)
- Historic England Heritage Supplementary Guidance (Various)
- GLA London View Management Framework supplementary planning guidance (2012)
- LBTH Draft Planning Obligations SPD
- Redchurch Street Conservation Area Character Appraisal and Management Guidelines (2009)
- Fournier Street Conservation Area Character Appraisal and Management Guidelines (2009)
- Boundary Estate Conservation Area Character Appraisal and Management Guidelines (2009)
- South Shoreditch Conservation Area Appraisal (2009) - LB Hackney

7 PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

1. Land use
2. Design
3. Heritage
4. Neighbouring amenity
5. Transport and servicing
6. Waste and recycling
7. Energy & sustainability
8. Biodiversity
9. Flood risk and drainage
10. Pollution
11. Environmental Impact Assessment
12. Planning balance
13. Planning contributions and CIL
14. Local Finance contributions
15. Human Rights and Equalities

Land use

7.2 The existing uses on the site are office (B1a), industrial (B1c), retail (A1) and leisure (D1).

7.3 The Local Plan policies on land use relevant to this application are:

- S.EMP1 - creating investment and jobs
- D.EMP2 - new employment space
- D.EMP4 - redevelopment within designated employment locations
- D.TC2 - protecting retail in our town centres
- D.CF2 - Existing community facilities

S.EMP1 - creating investment and jobs

7.4 Part 1 of the policy stipulates that development which supports and maximises the provision of employment floorspace will be supported and that development in the CAZ (tertiary area)

should provide office and mixed use schemes as part of an employment-led or mixed-use scheme.

- 7.5 Through the development of 14,393 sqm of office floorspace, 1,444 sqm of affordable workspace and 1,171 sqm of flexible retail, the requirements of Policy S.EMP1 part 1 have been met.
- 7.6 Part 3 of the policy sets out that proposals that deliver jobs and ensure a range of job opportunities will be supported.
- 7.7 The proposed development fully complies with the policy and as such is supported by Officers mindful that a) the development is liable to provide a wider range of jobs, than a purely office space scheme b) it proposes a very marked increase in the potential number of employees to circa 1,143 in the new development when fully occupied.

D.EMP2 - new employment space

- 7.8 As the proposal constitutes a 'major development' providing 15,837sqm of new office floor space Part 4 of Policy D.EMP2 applies and the scheme will provide as the policy requires 10% of the B1 floor space as affordable at 10% below the market rate. The policy requires as a minimum that affordable workspace is provided at this discount for 10 years. The scheme goes beyond this requirement and will provide it as affordable workspace, managed by an affordable workspace provider for the life of the development, an approach that is consistent with policy E3 of the London Plan.

D.EMP4 - redevelopment within designated employment locations

- 7.9 This policy states that redevelopment within the CAZ (tertiary area) should be employment-led or mixed-use to include office or other non-residential floorspace that supports the strategic function of the CAZ. This criterion has already been met – see Policy S.EMP1 part 1 above.
- 7.10 Whilst this redevelopment will result in a reduction in industrial floorspace, the site is neither a Local Industrial Location (LIL) nor a Strategic Industrial location (SIL). This means that the site's industrial designation does not need to be protected to support the long-term needs of the borough and policy D. EMP4 part 5 is not relevant here.
- 7.11 Policy D.EMP4 part 6 sets out that development which is likely to adversely impact or displace an existing business must find a suitable replacement accommodation within the borough unless it can be shown that the needs of the business are better met elsewhere.
- 7.12 The application sets out that the developer has discussed with the two existing tenants' a relocation strategy and both have sought alternative arrangements independent of the Applicant. This suggests that the developer made attempts to find a suitable replacement accommodation and hence this policy requirement is met.

D.TC2 - protecting retail in our town centres

- 7.13 Part 5 of the policy states that within Neighbourhood Centres the proportion of A1 use should not fall below 40% of all units within the designated centre. However, Columbia Street and Redhurch Street are exempt from this requirement. In regard to these two centres Part 7b of the policy states that any loss of floorspace must be of a scale that will not materially alter the nature of the unit, its future viability and the function of the host shopping Area and any loss of floorspace is of a scale that will not materially alter the nature of the unit.

- 7.14 28-32 Redchurch Street are within the Redchurch Street Neighbourhood Centre and therefore part 7b is applicable
- 7.15 The existing site is recorded as having 140sqm of retail floorspace. The proposed development, at ground floor level proposes a flexible permission of 1,171sqm commercial space (which includes A1 uses).
- 7.16 In this respect, there is no specific percentage of retail (A1) that needs to be retained. Notwithstanding this, policy objectives of the City Fringe Sub Area, and the Central Activities Zone, are for uses that serve a supporting role for office accommodation. The proposed flexible uses (including A1 and A3 uses) can reasonably be considered to meet the requirement of part 7b.

D.CF2 - Existing community facilities

- 7.17 Part 1 of policy resists the loss of community facilities unless it can be demonstrated that a) there is no longer a need for the facility or an alternative community use within the local community, or b) a replacement facility of similar nature that would better meet the needs of existing users is provided.
- 7.18 The site has in recent years contained D1/D2 (non-residential institution/assembly and leisure) use within the existing 1-5 Chance Street and 28 Redchurch Street building.
- 7.19 Information demonstrating there is no longer need for this use has not been provided and these uses would not be re-provided within the proposal. Officers recognise this policy conflict. However, given the scale of this loss and the benefits that arise from the quantum of other uses proposed, this non-compliance with policy is not considered sufficient to warrant refusal of the application.

Other

- 7.20 During pre-application discussions the GLA raised concerns about the loss of industrial 'maker space'. Officers are of the view that the proposed development addresses these concerns by way of the basement level of the B1a/B1c affordable workspace lending itself to 'maker space' occupations.

Summary

- 7.21 As detailed above the scheme raises no land use issues in relation to being in general accordance with relevant policies in the London Plan and the Local Plan.

Design

Policy

- 7.22 Policy D3 of the London Plan requires development to make the best use of land by following a design-led approach. This requires design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. The policy goes on to set out clear requirements that development must achieve in terms of 'Form and layout', 'Experience' and 'Quality and character'.
- 7.23 Policy S.DH1 in the Local Plan requires development to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm. To achieve this, the development should be of appropriate scale, height, mass, bulk and form in its site context, represent good urban design and ensure the architectural language employed complements and enhances its

immediate and wider surroundings. It also seeks to ensure that high quality design, materials and finishes are used to ensure the building is robust, efficient and fit for the life of the development.

- 7.24 Policy D9 of the London Plan requires that long-range, mid-range and immediate views are given careful consideration in the design of tall buildings.
- 7.25 The Local Plan defines tall buildings as those which are more than 30m tall or twice the height of prevailing surrounding buildings and identifies that tall buildings will be directed towards the borough's five designated Tall Building Zones.
- 7.26 Part 3 of policy D.DH6 of the Local Plan states that tall buildings outside of these zones will only be supported providing they meet the following criteria:
- a. located in areas with high levels of public transport accessibility within town centres and/or opportunity areas
 - b. address deficiencies in the provision of strategic infrastructure
 - c. significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and
 - d. do not undermine the prominence and/or integrity of existing landmark buildings and tall building zones
- 7.27 Policy D.DH2 of the Local Plan requires development to positively contribute to the public realm by:
- Optimising active frontages towards public streets and spaces.
 - Providing clear definitions and enclosure through building frontage and massing, and connection and continuity of pedestrian desire lines and street activities, at a human scale
 - Providing a range of public spaces that can function as places for social gatherings and other recreational uses

Urban grain/ mass/bulk and form

- 7.28 The proposed building would have an overall 47.5m width, 67.0m depth and height ranging from 11.3m - 40.5m (including rooftop plant) measured from ground level.
- 7.29 This would result in the majority of the site being covered by the proposed building and represents a relatively large uplift in the existing built footprint.
- 7.30 The overall height would be taller than the Tea & Biscuit Building to the west, the properties on Redchurch Street to the north and the properties on Chance Street, Whitby Street, Bethnal Green Road and Club Row to the east.
- 7.31 The proposed building would have a cruciform layout in plan finished primarily with flat roofs. Although there would be a three to five-storey pitched roof element fronting onto Ebor Street and a three-storey pitched roof element fronting onto Chance Street
- 7.32 The two main terraces in terms of size would be to the front on the roof and to the rear on the seventh floor. There would also be smaller terraces on the fifth floor to the east/north and west and the third floor to the east and south.

- 7.33 The loggias would be to the front from the second to the eighth floor, to the rear from the third to the sixth floor and to the east on the second floor.
- 7.34 Officers recognise that the proposed building would be taller and bulkier than the surrounding properties along the northern side of Bethnal Green Road. However, the massing is broken up and benefits from a series of roof heights and also the inclusion of upper storey setbacks from the frontages on surrounding streets.

Figure 11: Verified CGI view of the proposed scheme from the east on Club Row with the previously approved scheme in pink outline and a previous proposal in purple outline (Source: Townscape, Heritage & Visual Impact Assessment)



- 7.35 The above CGI, looking west along Whitby Street from Club Row, illustrates how the design has sought to break down the massing into different forms through various set back elements.
- 7.36 Material to consideration of this planning application is the lapsed consent PA/13/01638) for a building which had a similar plot coverage but was significantly taller than what is currently proposed, ranging in height from one to fourteen storeys. In figure 11 above, the pink wire line in the image illustrates the outline of the previously consented scheme. Whilst this scheme was consented under the previous Local Plan and has now lapsed, Officers conclude it remains a material planning consideration in respect of appropriate urban grain, mass, bulk and form for the site as well as regard for optimising the site.
- 7.37 Officers conclude that the proposed building would provide an acceptable urban grain, mass, bulk and form in its site context and arrive at this conclusion with regard to amongst others policy D3 (*Optimising site capacity through the design-led approach*) of the new London Plan.

Fenestration and materiality

- 7.38 The building is intended to be constructed using a modular construction method; consisting of three façade strategies which are the 'Primary mass', 'Central bays' and 'Low rise blocks'.
- 7.39 The Primary Mass would consist of two panel types with different iterations and variations for the corners, resulting in a total of thirteen modules. The Central Bays would consist of three panel types. The Low Rise Blocks would consist of three panel types.
- 7.40 The building would consist predominantly of ground floor glazed shop frontages, with the exception of some non-glazed frontage facing Ebor Street. At upper floor levels it would consist predominantly of window modules and curtain-wall glazing, with the exception of a strip of corrugated aluminium panels facing Ebor Street.
- 7.41 The external materials palette would consist predominately of reddish pink brickwork, cream reconstituted stone, metal balustrades and metal panels.
- 7.42 Some parts of the elevations would have a crinkled form while other parts would not.
- 7.43 Since submission of the application, Officers have worked with the architects of the scheme and have received a high level of detail in respect to the finish design and detailing of the facades. This included provision of 1:25 study drawings that provide a good level of confidence surrounding how the design of the scheme will be delivered and are fully consistent with the images provided.
- 7.44 Officers are satisfied with the palette of proposed external materials and the exact details surrounding materials, alongside façade joints and detailing of window openings would be provided and secured by condition.
- 7.45 In regards to the Ebor Street elevation, Officers did raise concerns with the amount of non-glazed frontage at ground floor level creating an inactive element and the amount of metal cladding on the upper floors.
- 7.46 However, it is considered that the proportion of these elements on the west elevation when assessed and viewed as part of the building as a whole, would not give rise to an unacceptable appearance overall.
- 7.47 With respect to the proposed shopfronts; signage, security, lighting and ventilation full details have not been forthcoming to date. However, Officers are satisfied these can be secured to an adequate design quality by way of condition.
- 7.48 Officers are satisfied the proposed building would successfully relate to its context and neighbouring warehouse-style buildings in this part of Shoreditch.
- 7.49 The front facade of 30-32 Redchurch Street is proposed to be retained, repaired and incorporated into the proposed building.
- 7.50 During the application process Officers requested further information on these works.
- 7.51 In response the agent submitted 'Design and Access Statement Addendum - Revision A' (D&A A) This document sets out that the proposal will seek to retain the brick façade at nos. 30-32 and demolish its ground floor and the whole of 28 Redchurch Street. The ground floor is then proposed to rebuilt like-for-like using its current language. A new roof would then span nos. 30-32 as well as the new building at no.28.

- 7.52 D&A A states that a preliminary facade condition survey has been undertaken by structural engineers to assess the current state of the facade at nos. 30-32 to establish the basis for the facade retention strategy in the next stages.
- 7.53 It goes on to state that further investigations will be carried out to determine the appropriate intervention to preserve, restore or repair each of the facade components; which they anticipate could be addressed via condition.
- 7.54 Weighing these factors together it is considered that on balance the proposed building would successfully tie in with the warehouse style buildings in this part of Shoreditch and would have acceptable fenestrations and materiality, subject to conditions requiring approval of materials, joints and a restoration strategy for the façade of 30-32 Redchurch Street

Tall buildings policy

- 7.55 The proposal is for a tall building outside of a designated Tall Buildings Zone and it is recognised that the proposed building does not comply with the requirements of parts 3b and 3c of policy D.DH6 of the Local Plan.
- 7.56 However, officers consider that the fourteen-storey development approved as part of PA/13/01638 carries weight in the assessment of the current proposal, as does the assessment and conclusions made on height by the Planning Inspector in granting that consent.
- 7.57 Given this previous approval, it is considered that the site is an appropriate location for a tall building and that the lack of compliance with 3b (address deficiencies in the provision of strategic infrastructure) and 3c (significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area) would not on balance constitute grounds for refusal in its own right.
- 7.58 Part 3a (high levels of public transport accessibility within town centres and/or opportunity areas) and 3d (do not undermine the prominence and/or integrity of existing landmark buildings and tall building zones) are considered to be met.

Design conclusion

- 7.59 To conclude, the scale, height, and massing of the proposed development would respond appropriately to the site's role within the borough. The building would have an acceptable relationship with neighbouring properties and the emerging context of tall buildings in the area, such as the Bishopsgate Goodsynd scheme (which has been resolved to grant), the implemented Avant-Garde Place and nearby consented/under construction schemes in Hackney, and would safeguard future development on neighbouring sites. The distribution of the height across the site with the maximum bulk and height set towards the south and Bethnal Green Road limits the degree of imposition the height of the scheme has on surrounding Conservation areas and street scene views from the north.
- 7.60 The architecture is considered to respond acceptably to the historic fabric of greatest importance. The materials and appearance of the building would be acceptable and the design would appear as a vibrant addition to Shoreditch overall.
- 7.61 In apportioning weight to these benefits, it is considered the scheme's architecture carries some weight in favour of the proposal.

Heritage

Policy

- 7.62 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the LPA to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.
- 7.63 Section 72(1) of the same Act requires the LPA to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas.
- 7.64 Paragraph 193 of the NPPF states that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”*.
- 7.65 Paragraph 194 adds that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 7.66 Paragraph 196 states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 7.67 Paragraph 197 states that *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*
- 7.68 Policies S.DH3 and D.DH4 of the Local Plan and policy HC1 of the London Plan require development affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Townscape Visual Impact Assessment (TVIA)

- 7.69 A TVIA was submitted during the application process following a request by the LPA. This has been used as part of the assessment on the impacts on nearby designated and non-designated heritage assets.
- 7.70 The TVIA noted significant adverse effects during demolition and construction, and significant beneficial effects reported during operation for some assets/views.

Statutory listed buildings

Owl & Pussycat public house

- 7.71 This Grade II listed building is considered to be the most likely to be affected by the proposed development.
- 7.72 Its Historic England listing describes its historic and architectural significance as *“Early C19 facade to probably C18 building. Stucco facade with quoins. Heavy dentil eaves cornice with frieze and blocking course above. Roof not visible. 3 storeys, 5 windows, all sashes with glazing bars. Those of 2nd floor in architrave surrounds, with moulded sills on brackets. 1st*

floor with architrave surrounds, pilasters and alternate triangular and semi-circular pediments on carved brackets. Ground floor below dentil cornice, pilasters between windows covered with glazed tiles”.

- 7.73 The main views of these features are from the north, north west and north east along Redchurch Street.
- 7.74 Given the setback of the main part of the proposed building it would not be readily visible in views directly in front of the pub. The view in Figure 13 shows a thin sliver of the proposal would be visible above the parapet line of the Grade II listed building from the opposite side of Redchurch Street. This compares favourably with the previously consented scheme which is shown by the pink wireline.

Figure 12: Existing view of the front elevation of The Owl & Pussycat (Source: Townscape, Heritage & Visual Impact Assessment)



Figure 13: Verified CGI view of the proposed scheme behind The Owl & Pussycat with the previously approved scheme in pink outline (Source: Townscape, Heritage & Visual Impact Assessment)



7.75 In contrast Figure 14 below looking east along Redchurch Street highlights that the proposals would be experienced in the setting of the of the listed building, albeit somewhat set back and away from the heritage asset.

Figure 14: Verified CGI view of the proposed scheme from the north east looking at the corner of Redchurch Street and Ebor Street with the application site in foreground and The Owl & Pussy Cat in view further to the east (Source: Townscape, Heritage & Visual Impact Assessment)



7.76 However, given that the listed building's special and architectural interest comes predominantly from its front façade, it is considered that the development would preserve these features.

7.77 Furthermore, given the proposed building's form which steps up away from the public house, it is considered that any harm to the setting of the listed building would be minimal.

Old Bishopsgate Goods Station, Braithwaite Viaduct, 25 Bethnal Green Road/1 Club Row, 3 & 5 Club Row with 31 Whitby Street to the east, iron railings gate and piers between Laleham House and Hedsor House, individual blocks with the Boundary Estate

7.78 The proposed building would be visible in townscape views of these nearby Grade II listed heritage assets.

7.79 However, given the building's massing and form and its separation distance from them and the cumulative impact of the Bishopsgate Goodsyards scheme it is considered that it would preserve their settings.

Locally listed buildings

7.80 Officers consider that the proposed development would not cause any harm or loss and the significance of the nearby locally listed buildings at 15 Bethnal Green Road and 9 - 13 Redchurch Street/2-4 Boundary Street, given the separation distances from them.

Conservation Areas

Redchurch Street Conservation Area

- 7.81 The proposed building would be partially within this Conservation Area (CA) and is therefore considered to be affected by it.
- 7.82 The Conservation Area is small-scale, tight-grain, mixed-commercial of a Victorian East End townscape character within an older street plan.

Figure 15: Application site in relation to Redchurch Street Conservation Area



- 7.83 The proposal would have a much larger footprint, massing and height than other properties within this CA.
- 7.84 It would also result in the loss of the application site's service yard which is an historic feature, having previously been connected to Whitby Street.
- 7.85 The proposed building would be visible within the CA, in particularly along Redchurch Street and Whitby Street and whilst these changes would be less significant than those arising from the previously consented scheme, it is still considered that the changes proposed to these views would not preserve the character of the CA and would therefore cause harm to it significance, this finding is also noted by Historic England in their consultation response as set out in Section 5 of this Committee Report.
- 7.86 This harm is considered to be 'less than substantial'. Therefore, as required by paragraph 196 of the NPPF this harm will be weighed against the proposal's public benefits in the Conclusion section of this report.

South Shoreditch Conservation Area

- 7.87 The South Shoreditch Conservation Area is located entirely within the neighbouring London Borough of Hackney. In 2009, the Conservation Area was extended eastwards thereby including the TEA Building and the western end of Redchurch Street.

- 7.88 As set out in Section 5 above, the London Borough of Hackney have provided two separate consultation responses with respect to the proposals. Notwithstanding comments about the overall design approach, they have outlined in these responses what they consider to be harm to the setting of the Tea Building and therefore the setting of the South Shoreditch Conservation Area.

Figure 16: Verified CGI view of the proposed scheme from the south west on Shoreditch High Street, with the Tea & Biscuit Building in the foreground (Source: Townscape, Heritage & Visual Impact Assessment)



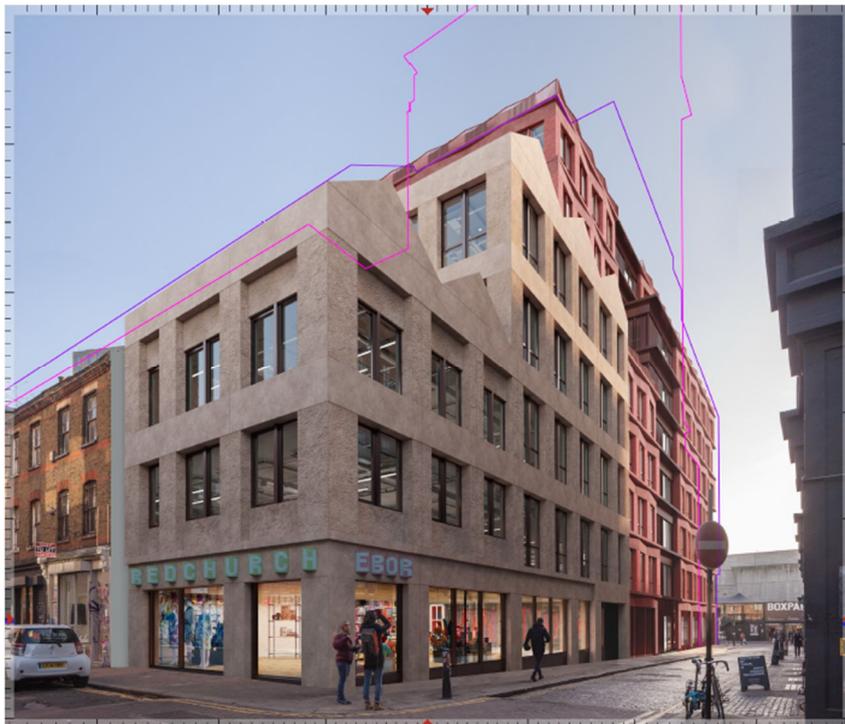
- 7.89 The above image from the applicant's TVIA shows Tea & Biscuit Building in the foreground and is taken from underneath the rail bridge on Shoreditch High Street looking east along Bethnal Green Road. This is considered to be one of the key views in which the proposal and the Tea & Biscuit Building would be seen together.
- 7.90 In this view, the seven-storey shoulder of proposed building can be just behind to the right of the traffic lights with the taller nine-storey element unfortunately obscured by the traffic light itself. Whilst the proposal would represent an increase in the prevailing townscape character from the existing, which currently steps down from the nine storeys of the Tea & Biscuit Building to 5/7 storeys immediately to the west of the Site on Ebor Street, the townscape character in this view is already significantly impacted by the Avant-Garde Tower at the junction of Bethnal Green Road and Sclater Street which rises to 25 storeys in height.
- 7.91 Whilst clearly further away from the Tea & Biscuit Building than the site, the Avant Garde Tower can also be seen as part of the setting of the South Shoreditch Conservation Area, and set within this view, any change to the setting of the Conservation Area resulting from the application proposals is not considered dramatic.
- 7.92 Notwithstanding the above, the site buildings on the western side of the Ebor Street, and opposite the site, also fall within the South Shoreditch Conservation Area. As noted above these buildings vary in height, with heights of five storeys and set back elements up to seven storeys.

7.93 The below existing and proposed images from the TVIA illustrate the changing relationship to the South Shoreditch Conservation Area from the proposals.

Figure 17: Existing view from the north west looking southwards down Ebor Street (Source: Townscape, Heritage & Visual Impact Assessment)



Figure 18: Verified CGI view from of the proposed scheme looking southwards down Ebor Street with the pink outline showing the previously consented scheme and the purple outline showing a previous scheme (Source: Townscape, Heritage & Visual Impact Assessment)



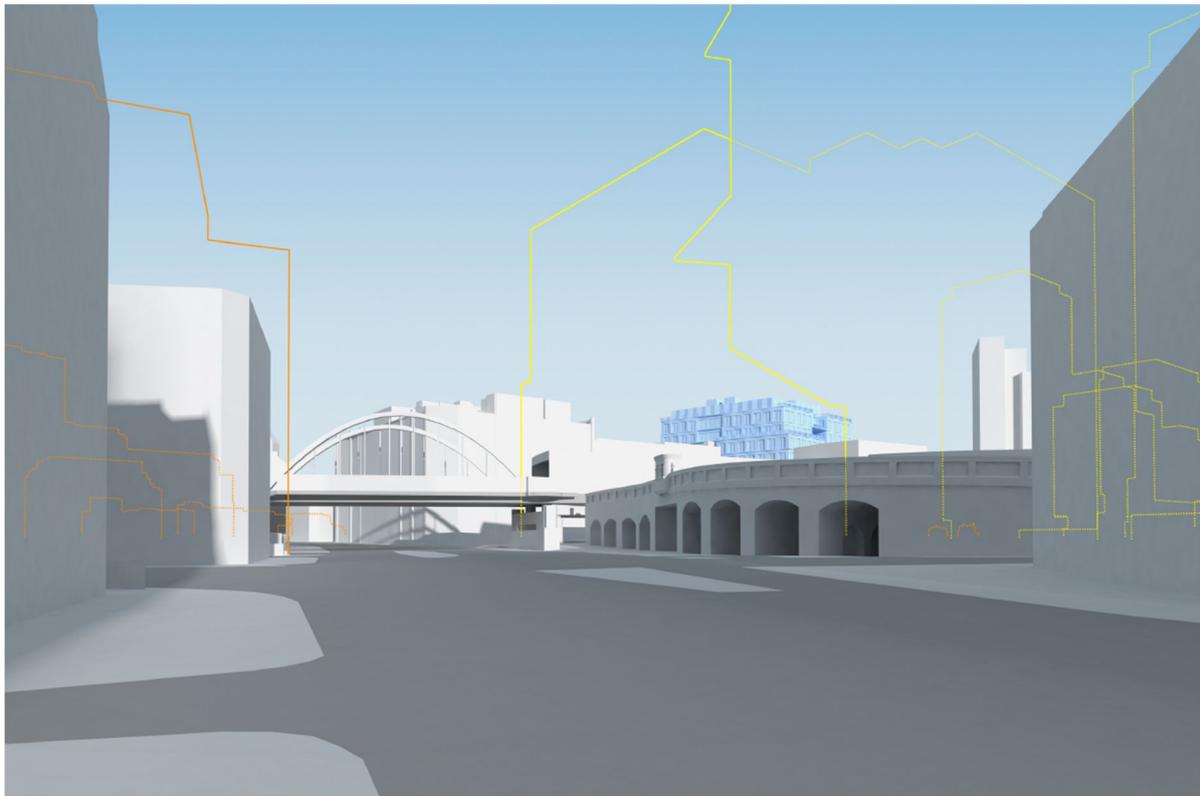
- 7.94 These views clearly demonstrate the increase in built form resulting from the proposals and their adjacency to the Conservation Area, to the right of the above views. Nevertheless, they also show the comparative reduction in built form from the previously consented scheme, again shown by the pink wireline.
- 7.95 With regard to the above relationship it is of note that Historic England concluded that, aside from harm to the Redchurch Street, there would be little change to the setting of other heritage assets in the locality.
- 7.96 Wider massing views of this relationship have also been provided within the TVIA as below.

Figure 19: Proposed CGI view of the proposed scheme from south west on Shoreditch High Street with the pink outline showing the previously consented scheme and the purple outline showing a previous scheme (Source: Townscape, Heritage & Visual Impact Assessment)



- 7.97 The above massing model shows an indicative view looking north along Shoreditch High Street. The proposal is shown in blue, above the listed Goodsyards arches and to the right of the Tea & Biscuit Building and the South Shoreditch Conservation Area. The pink wireline shows the previously consented scheme with the purple line showing a previous iteration of the current scheme.

Figure 20: Proposed CGI view of the proposed scheme from south west on Shoreditch High Street with the pink outline showing the previously consented scheme, the purple outline showing a previous scheme, the yellow outline to the right showing the resolved to grant Bishopsgate Goodway scheme and the orange outline to the left showing a consented scheme in Hackney (Source: Townscape, Heritage & Visual Impact Assessment)



- 7.98 The above image shows the same massing view but this time accounting for the consented Bishopsgate Goodyard scheme (shown in yellow) and a consented scheme in Hackney (shown in orange).
- 7.99 In light of the above, it is considered that whilst the proposals would impact on the setting of the South Shoreditch Conservation Area, any harm arising would be considered to be at the lower end of the 'less than substantial' harm category as per the provisions of the NPPF.

Boundary Estate Conservation Area and Fournier Street Conservation Area

Figure 21: Existing view southwards from Arnold circus mound, Boundary Estate (Source: Townscape, Heritage & Visual Impact Assessment)



Figure 22: Verified CGI of the proposed scheme - view southwards from Arnold circus mound, Boundary Estate (Source: Townscape, Heritage & Visual Impact Assessment)



7.100 The proposed building would be visible in townscape views of these nearby CAs.

7.101 However, given the building's massing and form and its separation distance from them, it is considered that it would preserve their character and appearance.

7.102 Furthermore, if implemented, the Bishopsgate Goodsyrd scheme would be more visible in these views than the proposed development.

Neighbouring amenity

7.103 Development Plan policies seek to protect neighbour amenity by safeguarding privacy and ensuring acceptable outlook. Development must also not result in an unacceptable material deterioration of the daylight and sunlight conditions of surrounding development. Nor should the development result in an unacceptable level of overshadowing to surrounding open space and private outdoor space. The levels of artificial light, odour, fume or dust pollution during the construction and life of the development must also be assessed.

Daylight and sunlight policy and guidance

7.104 Policy D.DH8 of the Local Plan requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments. Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook ‘Site Layout Planning for Daylight and Sunlight’ (2011).

7.105 For calculating daylight to neighbouring residential properties affected by the proposed development, the primary assessment is the vertical sky component (VSC) method of assessment together with the no sky line (NSL) or daylight distribution (DD) assessment where internal room layouts are known or can reasonably be assumed. These tests measure whether buildings maintain most of the daylight they currently receive.

7.106 BRE guidance in relation to VSC requires an assessment of the amount of daylight striking the face of a window. For full compliance with the BRE guidance the VSC should be at least 27%, or should not be reduced by more than 20% of the former value, to ensure sufficient light is still reaching windows.

7.107 The NSL calculation takes into account the distribution of daylight within the room, and again, figures for full compliance with the BRE guidance should not exhibit a reduction beyond 20% of the former value.

7.108 In regards to sunlight, a window is considered to be adversely affected if a point at the centre of the window receives in the year less than 25% of the Annual Probable Sunlight Hours (APSH), including at least 5% of the Winter Probable Sunlight Hours (WPSH) (September 21st - March 21st) and less than 0.8 times its former sunlight hours during either period. Sunlight is relevant to main living rooms (i.e. habitable rooms) of dwellings and conservatories, if they have a window facing within 90° of due south.

7.109 Figure 23 below contains LBTH numerical classifications that are applied to aid categorising impacts:

Figure 23: Classifications for daylight and sunlight loss

Reduction to daylight (VSC & NSL) and sunlight (APSH & WPSH)	Effect classification
0 - 19.9%	Negligible
20% - 29.9%	Minor adverse
30% - 39.9%	Moderate adverse
40% +	Major adverse

7.110 In regards to overshadowing, BRE guidance suggests that for a space to appear sunlit throughout the year, at least 50% of the amenity area should receive at least 2 hours of direct sunlight on March 21st. It states that the “*availability of sunlight should be checked for all open spaces*”, which usually includes gardens, sitting-out areas, parks or playgrounds.

7.111 BRE guidance also sets out that transient overdrawing diagrams can be used where a large building is proposed which may affect a number of gardens or open spaces. These diagrams plot a shadow plan showing the location of shadows at different times of day and year.

Daylight and sunlight report

7.112 A report assessing impacts on neighbouring properties was contained within the submitted ES. The report also assessed overshadowing, solar glare and light pollution (these will be addressed later in this Committee Report).

Figure 24: Daylight/sunlight model plan view (Source: Environmental Statement)



7.113 The properties that were assessed are as follows:

- 2 - 4 Chance Street
- 17 - 23 Whitby Street
- 3 Club Row
- 5 Club Row
- 7 - 9 Club Row
- 15 - 17 Redchurch Street
- 19 - 29 Redchurch Street

- 31 - 39 Redchurch Street
- 36 Redchurch Street
- 41 - 43 Redchurch Street
- 42 Redchurch Street
- 44 Redchurch Street
- 45 Redchurch Street
- 47 - 49 Redchurch Street
- 48 - 50 Redchurch Street
- 51 Redchurch Street
- 2 - 4 Boundary Street (Hotel)
- 13 Bethnal Green Road (Soho House hotel)
- 15 Bethnal Green Road

7.114 The Council appointed an independent daylight/sunlight consult to review the applicant's submitted report and independent consultant made the following comments:

- The scope of the assessment is appropriate.
- Cumulative impacts with consented Bishopsgate Goods Yard have not been assessed and that given its substantial height, bulk and massing it would have a cumulative effect on the sensitive receptors assessed.
- Not clear which properties have been assessed using room layouts and which are based on plans obtained through research. It would therefore be useful if the applicant could confirm which have been modelled using plan as opposed to estimates.
- Correct BRE methodology has been used to assess VSC, NSL and APSH.
- BRE's two-hour sun-on-ground assessment has not been undertaken. However, it is agreed that the transient foreshadowing study comprising of hourly snap shots on March 21st (Spring equinox), June 21st (Summer solstice) and December 21st (Winter solstice) is acceptable.

7.115 Officers agreed with this conclusion. Officers subsequently sought further clarification on the impact on some properties from the agent. This information was provided by the agent by the submission of two addendums to the report. The results of the original report and the two addendums are assessed below. Going forward the report and the two addendums will be treated as one assessment and referred to as the 'SDO'

7.116 *(Case Officer's note: Officers note that there is planning history indicating there may be flats on the upper floors of 46 Redchurch Street. This property has not been assessed in the DSO. However, Officers are of the view that the daylight/sunlight and overshadowing assessments to neighbouring properties are sufficient to assess that there would not be unacceptable impacts towards it.)*

Daylight results

7.117 The report identified the following properties as having windows and/or habitable room that would not meet the BRE guideline targets as a result of the proposed development:

- 17 - 23 Whitby Street
- 3 Club Row
- 5 Club Row
- 7 - 9 Club Row
- 36 Redchurch Street
- 41 - 43 Redchurch Street
- 44 Redchurch Street
- 45 Redchurch Street

- 47 - 49 Redchurch Street
- 48 - 50 Redchurch Street
- 51 Redchurch Street
- 2 - 4 Boundary Street (Hotel)

7.118 However, Officers note that daylight impacts, both by the VSC and NSL measures would be negligible or moderate and as such of not undue concern given the particular site context.

7.119 The following properties have a greater impact in terms of VSC and NSL and these are discussed in greater depth:

42 Redchurch Street

7.120 This property is identified as having a first floor studio apartment with six windows potentially impacted by the proposed development.

7.121 One of these windows would experience a moderate VSC loss of 34.8%. However, two of its windows would experience no loss and the other three would experience negligible to minor losses. Furthermore, the NSL loss to the apartment as whole would be negligible at just 8.5%.

7.122 Officers considers that these impacts are not of undue concern in the site context and are acceptable

2 - 4 Chance Street

7.123 Planning and Council Tax records indicate there are two residential units at this property at first and second floors.

7.124 This property is directly to the east of the site and the DSO identifies six windows and three habitable rooms potentially impacted by the proposed development.

7.125 The DSO suggests there would be a major VSC loss of 42.6% and 97.7% to two windows serving a second floor living/dining room. However, it indicates that this room is also served by two other windows that would have a negligible and minor VSC loss of and 3.5% - 27.3%. Furthermore, the room would only have a minor NSL loss of 25.7%. Officers consider the perception of light obstruction to a person in the inner part of the room will not be materially different and on balance considered acceptable.

7.126 The DSO indicates that all other habitable rooms within the property would experience negligible VSC and NSL losses.

7.127 Taken overall the impacts to this property are considered acceptable.

15 - 17 Redchurch Street

7.128 There are seven flats at this property which are at first to fifth floor levels and served by north and south facing windows.

7.129 This property is directly to the north of the site and the DSO identifies twenty windows and ten habitable rooms that would be impacted by the proposed development.

7.130 It suggests there would be a major adverse NSL loss of 40.7% to a second floor living/dining room. However, the report indicates that this room is served by two windows which would have negligible VSC losses of 9.5% and 13.9%. Officers consider the perception of light

obstruction to a person in the inner part of the room will not be materially different and on balance considered acceptable.

7.131 The report indicates that all other windows within the property would experience negligible VSC and negligible to minor and NSL losses to habitable rooms.

7.132 For these reasons Officers consider that the daylight impacts on all flats within this building would be acceptable.

19 - 29 Redchurch Street

7.133 There are five flats at this property which are at third and to fourth floor levels and windows are contained in all elevations.

7.134 This property is directly to the north of the site.

7.135 The DSO suggests there would be major NSL losses of 54.1% to a second floor bedroom, a 53.0% to a third floor bedroom and 52.0% to a third floor living/dining room. However, it indicates that the bedrooms are each served by a window that would experience minor VSC losses of 25.9% and 24.4% respectively. Furthermore, it indicates the living/dining room is served by two windows which would experience moderate VSC losses of 31.8% and 34.8% respectively. Officers consider that results indicate that the perception of light obstruction to a person in the inner part of the rooms will not be materially different and are on balance considered acceptable.

7.136 The report indicates that all surveyed windows would experience a moderate or less VSC loss and all other habitable rooms (apart from three mentioned above) will experience minor or less NSL losses.

7.137 For these reasons and given the context of the site Offices consider that on the daylight impacts on all flats within this building would be acceptable.

31 - 39 Redchurch Street

7.138 There are nine flats at this property which are at first to third floor levels and windows are in north and south elevations.

7.139 This property is directly to the north of the site and the DSO suggests there would be a major NSL loss of 46.8% to a first floor bedroom. However, the report indicates that its window would experience a moderate VSC loss of 23.3%. Officers consider that because of these results the perception of light obstruction to a person in the inner part of the rooms will not be materially different and on balance considered acceptable.

7.140 The report indicates that all surveyed windows would experience a minor or less VSC loss and all other habitable rooms (apart from the one mentioned above) will experience minor or less NSL losses.

7.141 Taken overall Officers conclude the daylight impacts on all flats are considered acceptable.

13 Bethnal Green Road, Soho House Hotel

7.142 This hotel has rooms at first to fifth floor levels.

7.143 The property is to the west of the site and the DSO identifies twenty-three windows and twelve habitable rooms that would be impacted by the proposed development.

- 7.144 Some of the hotel's bedroom windows facing Ebor Street will experience major VSC losses and five of the twelve surveyed rooms would experience major NSL losses. Two first floor bedrooms and two second floor bedrooms would experience major VSC losses to their windows and to their NSL levels.
- 7.145 When looking at the layout of the hotel it is noted that its corner bedrooms are dual aspect and are likely to maintain a view over Bethnal Green Road and rooms at fourth and fifth floor level are set back, some are dual aspect and contain private balconies which should ensure the impact is less severe.
- 7.146 On balance, Officers consider that given the hotel use which has a transient population that is most likely to use the hotel in the evening, the loss of VSC and NSL is considered acceptable given the site context, the material weight given to the previously consented scheme on site and when weighed against the regenerative benefits of the scheme.

15 Bethnal Green Road

- 7.147 Records indicates this property contains a live/work unit which is mainly at second floor level but with some space in the floors below.
- 7.148 The report identifies twenty windows and ten habitable rooms that would be impacted by the proposed development.
- 7.149 The property is directly to the east of the site and the DSO suggests there would be a major VSC loss of 73.3% and 81.6% to two windows serving a first floor room with an unknown use. However, the report indicates that this room is also served by another window that would have a negligible VSC loss of 19.8%. Furthermore, the room would only have a minor NSL loss of 23.1%. Officers consider that because of these results the perception of light obstruction to a person in the inner part of the room will not be materially different and on balance considered acceptable.
- 7.150 The report indicates that all other windows within the property would receive negligible to moderate VSC losses and negligible to minor and NSL losses to habitable rooms
- 7.151 Taken overall Officers conclude the daylight impacts on this property are considered acceptable.

Sunlight results

- 7.152 No effect was reported at nine properties, and negligible at one. All other properties surveyed would experience minor adverse or greater sunlight impacts which are set out in greater detail below.

17 - 23 Whitby Street

- 7.153 There are six flats at this property which are at second and third floor levels.
- 7.154 The property is to the east of the site and the DSO identifies fourteen windows that would potentially be impacted by the proposed development.
- 7.155 The report suggests there would be a minor adverse APSH loss to a second floor bedroom window but a 100% major adverse WPSH loss. However, given the existing winter sunlight hours is low at just 1%, any loss as a percentage appears logically greater. Officers consider this winter loss is not therefore unacceptable.

- 7.156 The report suggests there would be a minor adverse APSH loss to a third floor bedroom but a 50% major WPSH loss. Given the minor APSH loss and the specific site context Officers consider that the winter loss is not unacceptable.
- 7.157 All other windows surveyed would experience negligible to minor APSH and WPSH losses which are considered acceptable.
- 7.158 One window would not have the proposed development within 90° of due south.
- 7.159 Officers consider that sunlight impacts will be barely perceptible notwithstanding in absolute numerical terms the loss is high because the existing winter sunlight hours received is so small.

3 Club Row

- 7.160 Four windows at second and third floor level. were identified as being impacted by the proposed development.
- 7.161 This property is some distance east of the site and the DSO suggests APSH losses to habitable room windows would be negligible while WPSH losses be negligible to minor.
- 7.162 These impacts are considered to be small and therefore acceptable.

5 Club Row

- 7.163 Two windows at first and second floor level were identified as being impact by the proposed development.
- 7.164 This property is some distance east of the site and the DSO suggests APSH and WPSH losses to habitable room windows would be negligible.
- 7.165 These impacts are considered to be small and therefore acceptable.

7 - 9 Club Row

- 7.166 Nine windows at first, second and third floor levels were identified as being potentially impact by the proposed development.
- 7.167 This property is some distance east of the site and the DSO suggests APSH and WPSH losses to these habitable room windows would be negligible or zero
- 7.168 These impacts are considered to be small and therefore acceptable.

2 - 4 Chance Street

- 7.169 This property is to the east of the site and the DSO suggests there would be a major APSH losses to three windows serving the second floor living/dining room, and a major WPSH loss to two of the windows, with the third window not receiving any winter sunlight. However, the report indicates this living/dining room would have a fourth window which would experience moderate APSH and WPSH losses. Therefore, officers consider sunlight impact to this room would be acceptable
- 7.170 The other windows would not have the proposed development within 90° of due south and therefore APSH and WPSH impact are not relevant.

15 - 17 Redchurch Street

- 7.171 This property is to the north west of the site and the DSO suggests a first floor living/kitchen/dining room, a first floor bedroom a second floor living kitchen/dining room would all experience negligible APSH losses but 100% major adverse WPSH losses. Two third floor bedrooms would also have windows that would experience negligible APSH losses but major 50 - 75% WPSH losses. Officers consider these are not unacceptable because although there are major WPSH losses this is due to low existing WPSH levels of just 1-4% and would therefore not be readily perceptible.
- 7.172 All other affected windows would experience negligible annual to minor WPSH losses.
- 7.173 Officers therefore consider that given the site context these impacts on sunlight levels would be acceptable.

19 - 29 Redchurch Street

- 7.174 This property is to the north of the site and the DSO suggests a second floor living/kitchen/dining room and five bedrooms would all experience negligible APSH losses but major WPSH losses. On balance, Officers do not consider this unacceptable given the site context and low APSH losses.
- 7.175 The report suggests a second floor living/dining room would experience a negligible APSH loss but a major adverse WPSH loss. However, this room also appears to be served by another window in its north elevation. Its proposed sunlight levels are therefore considered acceptable by Officers.
- 7.176 The reports suggests four bedrooms and a living/dining room at third floor level would all experience negligible APSH losses but major WPSH losses. A further third floor bedroom would experience a negligible APSH loss and a moderate WPSH loss. On balance, Officers do not consider this unacceptable given the site context and low APSH losses.
- 7.177 A fourth floor living/kitchen/dining room would have one window that a negligible APSH loss and a major WPSH loss. However, it is also served by three other windows which would experience negligible APSH and WPSH losses. Its proposed sunlight levels are therefore considered acceptable by Officers.

31 - 39 Redchurch Street

- 7.178 The report suggests all affected windows serving habitable rooms across the first, second and third floors would experience negligible APSH losses but major WPS losses.
- 7.179 On balance, Officers do not consider this unacceptable given the site context and low APSH losses.

36 Redchurch Street

- 7.180 This property contains a first floor flat and a second flat.
- 7.181 The property is adjacent to the site to the north and the DSO suggests a first floor bedroom and a second bedroom would experience major APSH losses of 71% and 58.2% respectively and would both experience major 100% WPSH losses.
- 7.182 Officers acknowledge these impacts and consider that they would be noticeable to occupiers of the bedrooms. However, given the site context, the material wight given to the previously

consented scheme on site and when weighed against the regenerative benefits of the scheme, the impacts are not considered unacceptable on balance.

41 - 43 Redchurch Street

- 7.183 This property contains three flats at first to third floor level.
- 7.184 The property is to the north and the DSO identifies eleven windows as being potentially impacted by the proposed development.
- 7.185 APSH losses to all windows would all be minor.
- 7.186 Two first floor living/kitchen dining rooms would experience major WPSH impacts of 41.7% and 45.5% respectively. On balance, Officers do not consider this unacceptable given the site context and low APSH losses.

42 Redchurch Street

- 7.187 The DSO suggests four of the first floor studio apartment's six windows would be impacted by the proposed development.
- 7.188 It identifies there would be a major APSH loss to two windows and a moderate APSH loss to the other two windows which serve the first floor studio flat. It also suggests that all four windows would experience a major adverse WPSH loss.
- 7.189 Officers note the major a WPSH losses to all four windows and major APSH losses to two of them. However, two windows would only experience a moderate APSH loss. On balance, Officers do not consider this unacceptable given the site context and the moderate APSH losses to two of the windows.

44 Redchurch Street

- 7.190 Council Tax records indicate there is a first floor flat and a second/third floor flat at this property
- 7.191 The property is to the east of the site and the DSO suggests five windows would be impacted by the proposed development.
- 7.192 It suggests a first floor window currently receives zero sunlight and that the other four windows above would all experience negligible APSH losses. It suggests two of the windows would experience major WPSH losses while the other two would experience moderate losses.
- 7.193 Although the uses of these rooms are stated as 'unknown' in the DSO, Officers consider that were they to be habitable, given the negligible APSH losses to all windows, and the major WPSH losses to only two windows and given the particular context of the site the impacts are not unacceptable.

45 Redchurch Street

- 7.194 The DSO identifies habitable rooms at first and second floor level of this property and identifies that six windows could be impacted by the proposed development.
- 7.195 The DSO suggests there would be negligible to minor e APSH losses to three windows serving a first floor unknown room of unknown use and to three windows serving a second

floor unknown room of unknown use. Two of these windows would experience moderate WPSH losses while the other four would experience major losses.

- 7.196 Although the uses of these room are stated as 'unknown' in the DSO, Officers consider that were they all to be habitable, the negligible APSH losses to all windows and the particular site context would outweigh the major WPSH losses to four of the six windows and. Therefore, on balance the impacts are not unacceptable.

47 - 49 Redchurch Street

- 7.197 Planning history indicates that this three-storey building (including basement) contains flats on all floors.
- 7.198 This property is to the north east of the site and the DSO identifies that twelve windows could be impacted by the proposed development.
- 7.199 The DSO suggests there would be negligible APSH losses to all these windows. Eight of these windows would experience major WPSH losses, with the other four experiencing minor to moderate impacts.
- 7.200 Although the uses of these rooms are stated as 'unknown' in the DOO, Officers consider that were they all to be habitable, given the negligible APSHI losses to all windows, and the major WPSH to eight windows and given the particular context of the site the impacts are acceptable.

48 - 50 Redchurch Street

- 7.201 Planning history indicates this building that contains flats on its first to fifth floors.
- 7.202 This property is to the east of the site and the DSO identifies that ten windows could be impacted by the proposed development.
- 7.203 The DSO suggests there would be negligible APSH losses to all these windows. Four of these windows would experience major WPSH losses, with the other experiencing minor to moderate impacts.
- 7.204 Two of the major WPSH losses would be at first floor bedrooms, another would be at a third floor bedrooms and the other would be at a fourth floor kitchen which is also served by other windows.
- 7.205 Officers note the major WPSH losses. However, the bedrooms would all have negligible APSH losses and the kitchen is served but other windows. For these reasons and given the site context Officers do not consider these impacts to be unacceptable.

51 Redchurch Street

- 7.206 Council tax records indicate a first floor flat and a second floor flat at this property.
- 7.207 The report identifies habitable rooms at first and second floor level of this property and identifies that four windows could be impacted by the proposed development.
- 7.208 This property is to the north east of the site and the DSO suggests there would be negligible APSH losses to all these windows. It suggests that the two first floor windows would experience major WPSH losses of 40% and 50% respectively while the two second floor windows would experience minor WPSH losses.

7.209 Officers note the major WPSH losses which would be to windows serving the same living/kitchen dining room. However, given that the APSH losses are negligible and given the site context. Officers consider these impacts to be acceptable.

7.210 The other windows would experience negligible APSH and minor WPSH losses which Officers consider is small and acceptable.

2 - 4 Boundary Street/ 9-13 Redchurch Street (Hotel)

7.211 This property is to the north east of the site.

7.212 The DSO suggests one of the ground floor windows would experience a negligible APSH loss but a 100% major WPSH loss. However, the report suggests this window serves a reception which also has two other windows which would not experience any APSH or WPSH losses. Officers consider these impacts to be acceptable.

7.213 The report suggests that one of the other windows surveyed within 90° of due south of the proposed development would experience zero sunlight loss.

13 Bethnal Green Road, Soho House Hotel

7.214 The report identifies seven windows that could be impacted by the proposed development.

7.215 The windows would experience zero to negligible APSH losses and zero WPSH losses.

7.216 Officers consider these losses to be small and therefore acceptable.

15 Bethnal Green Road

7.217 The report suggests there would be a major APSH loss to two windows serving the first floor residential room of 'unknown' use. One of these windows would experience a major WPSH loss while the other would experience a minor loss. However, the report indicates that the room is served by a third window which would experience a minor APSH loss and a negligible WPSH loss.

7.218 The report suggests there would be a major APSH loss to two windows serving a second floor living/kitchen/dining room. One of these windows would experience a major WPSH loss, while the other does not receive winter sunlight currently. However, the report indicates that the room is served by a third window which would experience minor APSH and WPSH losses.

7.219 The report suggests that two of the three second floor greenhouse windows would experience minor APSH and negligible WPSH losses, while the third greenhouse window would experience no APSH or WPSH losses.

7.220 Officers acknowledge the major WPSH losses to the first floor room of unknown use and a second floor living/kitchen/dining room. However, given that these rooms are also served by other windows and given the site context the impacts are considered acceptable to Officers.

7.221 The other windows would not have the proposed development within 90° of due south.

Overshadowing

7.222 The SDO assessed transient overshadowing to nearby outdoor amenity areas, in line with BRE guidelines. Figure 25 summarises these below:

Figure 25: Overshadowing results

Area	March 21st	June 21st	December 21st
The Owl and Pussycat Courtyard - Existing	In shadow all day	In shadow 6.00 - 10.00 & 16.00 - 20.00	In shadow all day
The Owl and Pussycat Courtyard - Proposed	In shadow all day (specifically 10.00 -17.00)	In shadow all day (9.00 - 16.00 shadow caused from proposed development and the remainder of the day would be from other buildings).	In shadow all day (10.00 - 13.00 shadow caused from proposed development and the remainder of the day would be from other buildings).
Shoreditch House pool and amenity area - Existing	In shadow from 8.00 - 11.00 and gradually again from 14.00 - 17.00	In shadow from 6.00 - 11.00 and gradually again from 16.00 - 20.00	In shadow from 9.00 - 11.00 and gradually again from 14.00 - 15.00
Shoreditch House pool and amenity area - Proposed	No change	No change	No change
17 - 23 Whitby Street rear terrace - Existing	In shadow all day	In shadow from 6.00 - 12.00 and gradually again from 16.00 - 20.00	In shadow all day
17 - 23 Whitby Street rear terrace - Proposed	No change	No change	No change
44 - 46 Redchurch Street - Existing	In shadow all day	In shadow from 6.00 - 12.00 and gradually again from 16.00 - 20.00	In shadow all day
44 - 46 Redchurch Street - Proposed	Brief overshadowing at 16.00	Brief overshadowing at 16.00	No change

7.223 The results suggest the only outdoor amenity area that would experience a noticeable uplift in the amount of overshadowing would be The Owl & Pussycat's rear terrace on June 21st by virtue of additional overshadowing from 9.00 - 16.00, although this area is already in shadow from 9.00 -10.00.

7.224 The DSO also assessed the 2 hours 'sun on ground' test as set out by BRE guidelines to this terrace and reported that it does not currently achieve this as existing.

7.225 For these reasons Officers consider that the level of overshadowing given the specific site context is not unacceptable towards the Owl & Pussycat's rear terrace.

7.226 The additional overshadowing towards the other terraces are small and Officers consider this to be acceptable too.

Solar glare and light pollution

- 7.227 The DSO also assessed the impact of solar glare and light pollution on nearby sensitive receptors.
- 7.228 A minor adverse effect on light pollution was reported at Shoreditch House Hotel, and regarding solar glare minor adverse impacts were recorded at five viewpoints and a moderate adverse impact at one viewpoint.
- 7.229 LBTH's appointed consultant has reviewed the report and deemed the assessment method as acceptable. Officers agree with this and consider the solar glare and light pollution impacts are acceptable on balance.

Overlooking

- 7.230 The Local Plan does not contain specific separation distances between proposed office space and residential properties to prevent overlooking. However, the 'Explanation' section of policy D.DH8 of the Local Plan does state that a distance of approximately 18m between habitable rooms reduces inter-visibility to a degree acceptable to most people.

Neighbours to the west

- 7.231 West elevation windows at first floor level and above and the seventh floor terrace of the proposed building would be opposite Shoreditch House/Soho House Hotel to the west and be set back approximately 9m from this neighbouring property. On balance, and given that windows are serving office accommodation, it is considered that this relationship would not create unacceptable overlooking issues towards the east-facing hotel rooms, their private outdoor terraces and its communal rooftop terrace which is set further to the west over 20m away.
- 7.232 West elevation windows at first floor level above, the fifth floor terrace and the seventh floor terrace of the proposed building facing the Tea/Biscuit Building would be approximately 8-9m from this neighbouring property. Given this distance and commercial nature of this neighbouring property it is considered that there would not be unacceptable overlooking issues.
- 7.233 Officers acknowledge the importance of Shoreditch House, located adjacent to the Tea & Biscuit Building as a local enterprise which has a positive impact on the surrounding area. The vibrant nature of the uses at the premises, the private members club and the hotel all partially face the application site. Due to the existing buildings being of two storeys, Shoreditch House has enjoyed wide views over the eastern part of Tower Hamlets.
- 7.234 The proposed development will significantly obscure these views. Loss of views is not normally a material planning consideration. However, given the views experienced by the private members club are a unique benefit of this facility they have been considered in this instance and discounted as not being of sufficient material weight to restrict a development of the scale proposed and the associated benefits including job creation which have been discussed elsewhere in this report.

Neighbours to the north

- 7.235 Proposed north elevation windows at first floor level and above would be approximately 10m - 45m from a opposite Nos. 19 - 29, 31 - 39 and 41 - 43 Redchurch Street. The proposed third, fourth, fifth and sixth floor loggias would be approximately 30 - 33m opposite 31 - 39 Redchurch Street. The proposed seventh floor terrace would be approximately 32 - 36m opposite 31 - 39 and 41 - 43 Redchurch Street.

7.236 On balance, it is considered that these relationships would not create unacceptable overlooking issues towards windows and terraces of these neighbouring residential properties.

Neighbours to the east

7.237 The loggias at second and fourth floor levels would be approximately 10m opposite 2 - 4 Chance Street and 15 Bethnal Green Road. The third, fifth and seventh floor terraces would be approximately 7m from these neighbours.

7.238 It is noted that these separation distances fall below the recommended 18m in the Local Plan. However, Officers note that similar separation distances already exist between properties on Redchurch Street and Whitby Street. For example, an even closer relationship already exists between the rear windows and terraces of 48 - 50 Redchurch Street and 17 – 23 Whitby Street and similar separation distances existing between east elevation windows of 41-43 Redchurch Street and the west elevation windows of 45 Redchurch Street

7.239 On balance, given the specific existing context (which already consists of close relationships) it is considered that the proposed development would not create unacceptable overlooking issues towards windows and terraces of these neighbouring residential properties to the east.

Neighbours to the south

7.240 The nearest existing residential properties to the south are over 150m away on Quaker Street which are considered to be too far to be overlooked.

7.241 The south elevation windows in the proposed building would be over 20m away from nearest residential properties within the resolved to grant Bishopsgate Goodsyrd scheme. This therefore exceeds the 18m guideline in policy D.DH8 of the Local Plan and is considered acceptable.

7.242 Given these distances it is considered that there would not be unacceptable overlooking issues towards neighbouring residential properties to the south.

Overbearing

7.243 Assessing whether a development provides an acceptable or unacceptable sense of enclosure or is unduly overbearing cannot be readily measured in terms of a percentage or a measurable loss of outlook. Rather it is about how an individual feels about a space and consequently it is a subjective assessment, albeit based on principles of good urban design and relevant characteristics of the site and surroundings.

Neighbours to the west

7.244 The part of the proposed building facing Soho House Hotel would consist of its seven -storey element which would be set away by approximately 10m at its closest point and its nine-storey element which would be set a further 3m eastwards.

7.245 On balance, it is considered that this relationship would not appear unacceptably overbearing towards the east-facing hotel rooms, their private outdoor terraces and the hotel's communal rooftop terrace.

7.246 The part of the proposed building facing the Tea & Biscuit Building would consist of its two-storey element up to its seven-storey element.

7.247 On balance, it is considered that this relationship, together with the commercial nature of this neighbouring building would mean that the proposed development would not appear unacceptably overbearing towards the Tea & Biscuit Building.

Neighbours to the north

7.248 The proposed building would be opposite part of the south elevation 19 - 29 Redchurch Street. The closest part of the proposed building would be two storeys in height and set approximately 10m away. This is a similar relationship to the existing 28 Redchurch Street building (which would be demolished). Set back approximately 19m would be the proposed five-storey element and then set back approximately 34m would be the proposed nine-storey element. Given the set backs of these taller elements, Officers consider that the proposed development would not appear unacceptably overbearing towards 19 - 29 Redchurch Street.

7.249 The proposed building would be opposite the south elevation 31 - 39 Redchurch Street. The closest part of the proposed building would be three storeys in height and set approximately 30m away. A proposed seven-storey element would be approximately 32.5m away and a nine-storey element would be approximately 47m away. Officers consider that the combination of these proposed heights, massing and separation distances would not make the built form appear unacceptably overbearing towards 31 - 39 Redchurch Street.

7.250 The proposed building would be in line with the south elevation 41 - 43 Redchurch Street. The closest part of the proposed building would be three storeys in height and set approximately 20m away. A proposed seven-storey element would be approximately 30m away and a nine-storey element would be approximately 42m away. Officers consider that these proposed heights, massings and separation distances would not make the built form appear unacceptably overbearing towards 41 - 43 Redchurch Street either.

Neighbours to the east

7.251 The proposed building would be opposite part of the west elevation of 15 Bethnal Green Road. The closest part of the proposed building would be five storeys in height and set approximately 6.5m away and a proposed nine-storey element would be approximately 9.5m away. Officers recognise that the proposed building would be comparatively close and high in relation to this neighbouring property. However, on balance, taking into account the site context and giving due consideration to the relationship with the previously consented scheme, Officers consider this relationship to be acceptable.

7.252 The proposed building would be opposite part of the west elevation of 2- 4 Chance Street. The closest part of the proposed building would be three storeys in height and set approximately 6.5m away and a proposed seven-storey element would be approximately 9.5m away. Officers consider that these proposed heights, massings and separation distances would not make the built form appear unacceptably overbearing towards this neighbour.

7.253 The west elevation windows of 42 Redchurch Street would not directly face the proposed building. Therefore, Officers consider that the proposed development would not appear unacceptably overbearing towards this property either.

Conclusion on neighbouring impacts

7.254 For the reasons stated above including (a) the adverse impacts being limited to a relatively small number of residential properties, (b) tight built relationships often replicating existing distances set between properties and facing windows across the streets in question and (c) giving material weight to the amenity impacts that would have resulted from the previously consented, albeit now lapsed, scheme officers consider the impacts on balance acceptable and broadly compliant with policy D.DH8 of the Local Plan

Transport & servicing

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

7.256 The application site is located opposite the Shoreditch High Street Station which is served the London Overground line. Opposite the site lie two bus routes (8, 388 and N8) and the site is within walking distance of the A10 which is a major bus corridor, as such the site has an 'excellent' PTAL rating of between 6a and 6b, which are the highest possible levels.

7.257 The nearest cycle hire docking station is on the opposite side of Bethnal Green Road, with 38 docking points.

7.258 Officers consider there would be benefits to pedestrian journeys from the new pedestrian crossing on Bethnal Green Road and the new access through the building from Bethnal Green Road to Chance Street. There would also be some benefits to pedestrians on Chance Street as there would no longer be vehicles existing onto it.

Healthy Streets and public realm

7.259 The Transport Assessment (TA) contains an Active Travel Zone (ATZ) assessment.

7.260 TFL raise concerns that streets surrounding the proposed development may not be able to accommodate the increased footfall. They requested that the applicant assess pedestrian comfort levels on surrounding the streets, capturing cumulative development including Bishopsgate Goods Yard and agreed with TFL.

7.261 TFL also commented that pre-application advice in 2019 was based on an internal route through the site being provided and that the status of this route and site permeability is unclear. TFL requested that the applicant clarify this, including wayfinding and whether any routes through the site are intended to be made publicly available in perpetuity.

7.262 TFL also commented that the public realm should be expanded on Ebor Street and Chance Street to provide footways of 2m on either side, in support of the Healthy Streets Approach and the Streetspace for London plan.

7.263 *(Case Officer's note:*

Pedestrian comfort levels contained within the Environmental Statement were considered to be acceptable.

There is public access from Chance Street and Bethnal Green Roads shown on the proposed ground floor plan. Although, there is no mechanism for maintaining this route in perpetuity Officers do not consider this to be unacceptable given that there is no public access through the site currently.

Officers note the comments on expanded footways but are of the view that this would not constitute grounds for refusal given that existing buildings on site do not have these setbacks.)

Cycle parking

7.264 Policy T5 of the London Plan set out the following cycle parking standards for areas with higher minimum cycle parking standards:

Figure 26: London Plan cycle parking standards

Use Class	Long-stay for employees	Short-stay for visitors/ customers
A1 food retail above 100sqm	1 space/175sqm GEA	1 space/20sqm GEA for the first 750sqm 1 space/150qm thereafter
A1 non-food retail above 100sqm	1 space/150sqm GEA for the first 1,000sqm 1 space/100sqm GEA thereafter	1 space/60sqm GEA for the first 1,000sqm 1 space/500sqm GEA thereafter
A3	1 space/175sqm GEA	1 space/20sqm GEA
B1a office	1 space/75sqm GEA	1 space/500sqm GEA for the first 5,000sqm 1 space/5,000qm thereafter
B1c industrial	1 space/500sqm GEA	1 space/1,000sqm GEA

7.265 Based on these minimum requirements the proposed development would need to provide the following:

Figure 27: Cycle parking minimum requirements

Use Class	GEA	Long-stay spaces for employees	Short-stay for visitors/ customers
A1/A3 unit (based on non-food A1)	666qm	5	34
A1 units (based on non-food A1)	661sqm	5	34
B1a/B1c affordable workspace	1,444sqm	20	3
B1c industrial	15,738sqm	32	16
Total	18,267sqm	62	87

7.266 The proposed development would have 364 cycle spaces which would all be contained within a single store at the first basement level.

- 7.267 LBTH T&H comment that the number of cycle spaces is adequate. However, a minimum of 5% of these need to be for large/adapted cycles. They comment that the applicant should refer to the LCDS and highlight where the requirements have been met.
- 7.268 They also concur with TFL's response which references the need for the cycle facilities (including washing and changing facilities) to meet the requirements of the London Cycle Design Guide (LCDS).
- 7.269 The LCDS sets out that there should be a minimum aisle width of 2500mm beyond the lowered frame of two-tier parking, and 3500mm between racks on opposite sides of the aisle. TFL comments that the layout in the submitted plans shows that the space between tiered racks is not in line with LCDS.
- 7.270 TFL also comments that short-stay cycle parking should be provided in the public realm and should include cargo cycle parking to encourage and enable active freight.

7.271 (*Case Officer's note:*

Discussions between Officers and the agent on large/adapted cycles storage layouts are ongoing. The Committee will be updated with any progress made on this matter. However, in any case, Officers are of the view that there is sufficient space in the first basement level to provide confidence that these details could be secure via condition if required.

Officers are of the view that it would not be reasonable given the specific site context to request public realm cycle parking.)

Car parking

- 7.272 Policy T6 of the London Plan states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport. Policies T6.2 and T6.3 add that office and retail development in the CAZ should be car-free with the exception disabled persons parking. Policy T6.5 adds that non-residential element should have access to at least one on or off-street disabled persons parking bay.
- 7.273 The proposed development would be car-free with the exception of an on-site disabled persons parking bay next to the ground floor loading bay on the western side of the proposed building.
- 7.274 LBTH T&H welcome the general lack of car parking.
- 7.275 LBTH T&H also note that one accessible bay is proposed on site and whilst there are a number of uses planned at the development they consider this acceptable subject to a management plan outlining how this bay will be made available to book.
- 7.276 TFL raises no objection and adds that future occupants should be restricted from applying for a parking permit.

Deliveries & Servicing

- 7.277 A Transport Statement (TS) and a Delivery, Servicing and Management Plan (DSP) was submitted with the application.
- 7.278 It highlighted that delivery vehicles are proposed to access the proposed off-street ground floor loading bay via Ebor Street which is a one-way street.

- 7.279 LBTH T&H objected to these initial on-street servicing proposals due to pedestrian safety concerns.
- 7.280 Following discussions with Officers the agent team submitted a Transport Addendum (TA) which proposed that all vehicles used the off-street loading bay and that the applicant would fund the costs of advertising and implementing a traffic regulation order (TRO) for Ebor Street to have no-loading restrictions imposed on it. The TA showed an amended swept path analysis with a proposed extended vehicle crossover.
- 7.281 LBTH T&H were supportive of the off-street servicing. Concerns were raised that the proposed crossover was unnecessarily wide which would be detrimental to pedestrians. However, LBTH T&H are of the view that these details can be addressed through a Section 278 agreement. They therefore raised no objection subject to the Section 278 agreement.

Cycling

- 7.282 TFL comment that cycle mode share for trips in this part of London are some of the highest in the city, with Bethnal Green Road ranking in the top 5% of streets in London for current cycling demand.
- 7.283 TFL state that the ATZ should be amended to show the closest part of the Strategic Cycle Network (SCN) which is CS1 (700m west of the site) and the proposed Q13 (which will be 250m to the north on Virginia Road).
- 7.284 TFL adds that given existing and planned cycle infrastructure enhancement, future improvements including the Streetspace for London plan, the wider trend towards greater levels of cycling, and the existing demand for cycling in the area, the cycle mode share should be higher than that presented in the trip generation assessment. The TA should be amended to reflect this and to applied to the design of the development accordingly.
- 7.285 TFL comments that the cycle hire docking station opposite the site on Bethnal Green Road has 38 docking points and is among the top 15 busiest docking stations in London out of over 800 sites and is the busiest in east London. This docking station already operates over capacity and TFL expects the development to increase use of cycle hire.
- 7.286 Therefore, TFL expects the applicant to expand cycle hire at or near the site to mitigate the impact on the cycle hire network via a £220,000 contribution of towards expanding the cycle hire system. This would include and cover the cost of the assets, construction, surveys, planning, design and maintenance for one station with 40 docking points.

Waste & recycling

- 7.287 Local Plan policies require adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements.
- 7.288 Policy D.MW3 of the Local Plan requires new major residential development to incorporate high quality on-site waste collection systems that do not include traditional methods of storage and collection and are compatible with the Council's waste collection methods. In instances where this is not practicable, supporting evidence must be submitted with the application to demonstrate this.
- 7.289 The submitted Planning Statement (PS) states that the proposed development is estimated to generate 99,220L of waste per week and 559 tonnes per year from all commercial land uses. This is based on the following:

- Weekly waste generation of 72,220L from B1a use, 18,420L from A1/A3 use and 6,600L from B1a/B1c use.
- Approximate densities of 84 kg/m³ for mixed dry recyclables (MDR), 667 kg/m³ for food waste (FW) and 81 kg/m³ for residual waste (RW).

- 7.290 The proposal includes a dedicated refuse storage area in the north west corner of the first basement level. It is proposed to have capacity for 24 x 1,110L bins, 18 x 360L bins and 2 x in-bin lever-arm compaction units.
- 7.291 The PS states that the compaction units would compact the MDR and RW to ratios 2:1 and 3:1 respectively with FW remaining uncompacted.
- 7.292 Based on this the PS estimates that the waste quantity required to be managed and stored would be approximately 44,252 L per week from all commercial land uses.
- 7.293 The waste storage requirements for all the proposed uses has been calculated based on a twice-weekly collection frequency. The waste generated from the A1 and A1/A3 space are based on a seven-day working week, whereas waste generated from the B1a and B1a/B1c space are based on a five-day working week.
- 7.294 The PS states that on a daily basis (or as agreed), an internal management team will transfer waste from the all commercial spaces (A1, A3, B1a and B1c) to the basement waste store where it will be compacted as described above, by trained members of staff only
- 7.295 LBTH WP&D raises concerns over the submitted Delivery and Servicing strategy. The proposed deliveries will be from 06.30 - 08.00 which are concerns with noise nuisance particularly within built up areas. Waste Improvement does not allow waste operational services to make any waste collections before 07.00am. There are no exceptional circumstances to show that deliveries should be made before 07.00am.
- 7.296 The proposal is showing refuse collections to be made from the kerbside. This is not acceptable for this development as sufficient space within the site should be provided for an internal management system. Waste Improvement will require the applicant to ensure that the bags / containers are brought to ground level on the day of collection. Any Containers / bags must be left at a suitable collection point away from the highway on land belonging to the development and within 10m of vehicle access.
- 7.297 *(Case Officer's note: Discussions in regards to waste collection arrangements are currently ongoing with the agent and the Committee will be updated with any progress made.)*

Energy & sustainability

- 7.298 At a national level, the NPPF sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The NPPF also notes that planning supports the delivery of renewable and low carbon energy and associated infrastructure.
- 7.299 Part 1 of policy D.ES7 of the Local Plan requires development to be Zero carbon (to be achieved through a minimum 45% reduction in regulated CO₂ emissions and the remaining regulated CO₂ emission to 100% - to be off-set through a cash in lieu contribution).
- 7.300 Part 2 of the policy adds that new non-residential development over 500sqm is expected to meet or exceed a BREEAM 'excellent' rating.

7.301 Part 3 adds that major non-residential development will be required to submit an energy assessment, with part 4 stating that this assessment should demonstrate how the development has been designed in accordance with the energy hierarchy ('be lean, be clean, be green') and will:

- Maximise energy efficiency as per the requirements set out in Part 2.
- Outline the feasibility of low N02 decentralised energy.
- Seek to provide up to 20% reduction of C02 emissions through on-site renewable energy generation.

7.302 The Environmental Statement reports that the proposed development would have significant effects on Greenhouse Gas emissions. However, the LBTH Energy Efficiency/Sustainability Officer considers that the proposed energy efficiency measures and on-site carbon emission reductions are acceptable, subject to the recommended financial contribution to carbon offsetting and the recommended conditions.

Biodiversity

7.303 Policy D.ES3 of the Local Plan requires development to protect and enhance biodiversity.

7.304 Policy G6 of the London Plan requires proposals to manage impacts on biodiversity and aim to secure net biodiversity gain.

7.305 A Preliminary Ecological Appraisal (PEA) was included within the ES.

7.306 LBTH's Biodiversity Officer raises no objection to its finding and has deemed the proposed development acceptable on biodiversity grounds subject to a condition requiring details of biodiversity mitigation and enhancements to be secured through a condition.

Flood risk & drainage

7.307 Policy D.ES5 of the Local Plan requires development to reduce the risk of surface water flooding, through demonstrating how it reduces the amount of water run-off and discharge from the site through the use of appropriate water reuse and sustainable drainage systems techniques.

7.308 A Drainage Strategy DS has been submitted with the application.

7.309 The LBTH SUDS Officer reviewed the DS and made the following comments:

- The proposed 3.2L/s discharge rate is too high and the site should go further to reduce the peak discharge rate to 2.0L/s in a 1 in 100 year storm + 40% climate change storm event. This would bring the peak discharge rate closer to the defined greenfield rate for the site.
- The drainage proposal primarily makes use of below ground storage attenuate tanks and has incorporated very few SUDS techniques.
- The DS states that incorporating green roofs into the drainage strategy will be subject to architect and MEP design input. This need to be committed to.

7.310 The LBTH SUDS Officer is of the view that these details can be secured via condition requiring a detailed surface water drainage scheme.

Pollution

7.311 Policy D.ES2 of the Local Plan requires development to meet or exceed the 'air quality neutral standard, to submit an air quality assessment for major development and provide mitigation where an assessment indicates that a development will cause harm to air quality or where end users could be exposed to poor air quality.

7.312 LBTH Environmental Health (Air Quality) Officer has raised no object to the air quality assessment with the submitted Environmental Statement subject to conditions.

Health Impact Assessment (HIA)

7.313 Policy D.SG3 of the Local Plan requires proposed development that is of a scale referable to the GLA to submit a detailed HIA with a planning application.

7.314 The 'Explanation' section of this paragraph adds that a detailed HIA can also be submitted as part of an integrated impact assessment.

7.315 It is noted the Council's HIA Officer sought a detailed HIA.

7.316 However, Development Management Officers consider that given the nature of the proposed uses, the quantum of development and the site location, the absence of a submitted HIA does not pose any undue substantive concerns in respect of health outcomes in relation to Policy D.SG3.

Environmental Impact Assessment (EIA)

7.317 It is considered that the proposed development is likely to create significant effects so it would constitute EIA development. The application was submitted in March 2020 and was accompanied by an Environmental Statement (ES) produced by Waterman on behalf of UKI (Shoreditch) Limited, and provided assessment of the following topics:

- Socio-Economics
- Transport
- Air Quality
- Noise & Vibration
- Ground Conditions
- Wind Conditions
- Daylight, Sunlight, Overshadowing, Light Pollution & Solar Glare
- Greenhouse Gases Chapter
- Townscape and Visual; and
- Heritage.

7.318 The ES noted a significant adverse effect from demolition and construction works.

7.319 However, it also noted significant socio-economic benefits during construction and operation and significant beneficial effects for wind.

7.320 The ES has been reviewed in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations).

7.321 The application has been supported by an ES and Non-Technical Summary (NTS) (March 2020), an ES Interim Review Report Response (November 2020), and an ES Addendum including a revised NTS and revised Townscape, Heritage and Visual Impact Assessment (February 2021). The ES Addendum was considered to be 'further information' under Regulation 25 and were processed as required under the EIA Regulations.

- 7.322 The LBTH EIA Officer and the Council's appointed EIA Consultants have confirmed that the submitted ES (including the subsequent ES submissions as set out above) meets the requirements of the EIA Regulations.
- 7.323 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the proposed development, which forms the basis of the assessment presented in this report.
- 7.324 Appropriate mitigation / monitoring measures as proposed in the ES will be secured through planning conditions and/or planning obligations. The environmental information comprises the ES, including any further information and any other information, any representations made by consultation bodies and by any other person about the environmental effects of the Proposed Development.

Planning balance

- 7.325 In line with Paragraph 196 of the NPPF (2019) the less than substantial harm to the Redchurch Street CA, the setting of the South Shoreditch CA and the setting of the Grade II listed 34 Redchurch Street resulting from the development needs to be weighed against public benefits.
- 7.326 Each of these elements in isolation is considered to result in less than substantial harm at the lower end of the less than substantial harm category. Taken together they would still result in less than substantial harm towards the lower end of the scale.
- 7.327 The main public benefits resulting from the proposals are considered to be substantial and of compelling weight including the increase of employment floorspace and employment jobs that will flow from that including the provision of affordable workspace. There would also be benefits to local residents and the local economy during the construction process.
- 7.328 It is considered that on balance these public benefits outweigh the identified heritage harm and as such the proposals would accord with the provisions of the NPPF as they relate to harm to designated heritage assets.

INFRASTRUCTURE IMPACT

- 7.329 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of **approximately £1,840,663.20** (based on the 2021 indexation and the assumption of all the commercial space being used as retail) and Mayor of London CIL of **approximately £3,422,653.58** (based on the 2021 indexation and the assumption of all the commercial space being used as retail). These figures are indicative only and have been estimated using the most up to date available information on floorspace and would be subject to indexation any relevant relief.
- 7.330 The CIL Regulations 2010 (as amended) allow the Council to accept full or part payment of CIL liability by way of transfer of land to the Council. The Council may also enter into agreements in writing (subject to the criteria in Regulation 73A) to receive infrastructure payments, before the chargeable development is commenced. The infrastructure to be provided must be related to the provision of the types of projects listed in the Council's Regulation 123 list.
- 7.331 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.
- 7.332 The applicant is required to meet a financial contributions that are sought by the Council's Planning Obligations SPD which are as follows:

- £68,032.00 towards construction phase employment skills training
- £411,160.60 towards end-user phase employment skills training
- £363,758.04 towards carbon off-setting

HUMAN RIGHTS & EQUALITIES

- 7.333 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.
- 7.334 The proposed development does however provide a series of benefits through the provision of affordable workspace and the creation of jobs.
- 7.335 Officers are satisfied that the proposed development would not result in adverse impacts upon equality or social cohesion.

CONCLUSION

- 7.336 Officers assessed the proposed development against the relevant Development Plan Policies, having regard to the consultation responses received and other material considerations. In drawing conclusions, officers have given full consideration to the Environmental Statement and are satisfied that the significant effects that would have been considered likely to occur during both construction and operations would be adequately mitigated by the proposed measures. On this basis, Officers are further satisfied that the proposed development would not give rise to an unacceptable environmental impact.
- 7.337 Taking all into account, the proposed development is considered to be acceptable and it is recommended that planning permission is granted, subject to the planning conditions and obligations set out in this report.

8 RECOMMENDATION

- 8.1 Resolve to **GRANT** subject to the prior completion of a legal agreement to secure the following planning obligations

Financial Obligations

- £68,032.00** towards construction phase employment skills training
- £411,160.60** towards end-user phase employment skills training
- £363,758.04** towards carbon off-setting
- £220,000** contribution of towards expanding the cycle hire system
- £500** per heads of term

Non-Financial Obligations

- Economic incentives
 - Access to employment
 - 20% local procurement
 - 20% local labour in construction
 - 10 construction phase apprenticeships, at a minimum of level 2
 - 4 end-user phase apprenticeships
 - Provision of 10% affordable rented (90% of market rent) workspace for the lifetime of the development (including provision of Affordable Workspace Strategy prior to the completion of the construction phase of the development).

- b. Implementation of mitigation measures as per the ES documents
- c. Transport matters:
 - i. Permit free development
 - ii. Non-residential Travel Plans
 - iii. S278 Agreement (highways works to Bethnal Green Road and Ebor Street)
 - iv. Booking scheme for disabled parking bay
 - v. TRO works to Ebor Street
- d. Compliance with Considerate Constructors Scheme
- e. Energy efficiency measures

8.2 That the Corporate Director of Place is delegated the power to impose conditions and informatives to address the following matters:

Planning Conditions

8.3 The conditions apply to each phase of the proposed development, insofar as they are relevant to that phase.

8.4 Compliance

1. Timeframe - 3 years deadline for commencement of development
2. Plans - Development in accordance with approved plans
3. Air Quality – Emission standards for boilers & CHP
4. Construction – Restrictions on demolition and construction activities:
5. Construction – All works in accordance with Tower Hamlets Code of Construction Practice;
6. Construction – Standard hours of construction and demolition
7. Construction – Air quality standards for construction machinery
8. Construction – Ground-borne vibration limits
9. Construction – Noise pollution limits.
10. Energy – Energy and efficiency standards
11. Car-free development
12. Land Contamination – Contamination not previously identified triggers a further Remediation Strategy
13. Land Contamination – No surface water infiltration into ground
14. Land Contamination – Piling
15. Land Use – All A1, A1/A3, B1a/B1c and B1a floorspace shall be maintained as employment floor space for the lifetime of the development
16. Noise – Noise standards from mechanical plant and equipment
17. New SUDS scheme required.

Post- clearance of the site

18. Biodiversity - Measures to ensure no nesting birds harmed

Pre-commencement

The inclusion of the following pre-commencement conditions has been agreed in principle with the applicants, subject to detailed wording

19. Archaeology - evaluation to clarify the nature and extent of surviving remains, followed by a full investigation if necessary
20. Façade retention survey and strategy
21. Biodiversity – Mitigation and Enhancement

22. Construction – Code of Construction Practice
23. Construction – Construction Waste Management Plan
24. Construction – Construction and Demolition Plan
25. Construction – Construction Environmental Management Plan and Construction Logistics Plan
26. Construction – Construction Management Plan
27. Construction - Dust and Emissions
28. Construction - PM 10 monitoring
29. Energy - Zero Carbon Futureproofing Statement
30. Land Contamination - Ground Investigation analysis and risk assessment
31. Land Contamination - Remediation Strategy
32. Land Contamination – Baseline Monitoring
33. Land Contamination - Monitoring Maintenance and Mitigation Plan
34. Land Contamination - Boreholes
35. Circular economy
36. Lifecycle

Pre-superstructure works

37. Air Quality - Details of flue emissions
38. Design - Details of external facing materials and architectural detailing.
39. Design - Details of landscaping
40. Design - Wayfinding and signage strategy
41. Highways – Details of cycle parking
42. Highways - Car parking (details of provision and Management Strategy relating to allocation of parking bay)
43. Highways - Delivery, Servicing and Waste Management Plan
44. Noise - Operational noise impact assessment and mitigation (plant and machinery etc)
45. Odours – Details of kitchen extracts
46. Air Quality - Emission Standards for Boilers & CHP
47. Secured by Design - details
48. Wind mitigation measures for seating on the corner balconies of the fifth, seventh or ninth floors comprising shrubs in planters (1.5m in height) or solid screens (1.5m in height)
49. Landscape strategy
50. Photovoltaic layout
51. Water - Details that all water network upgrades required to accommodate the additional flows to serve the development have been undertaken
52. Drainage – new surface water drainage scheme required

Prior to occupation

53. Energy - Post construction energy assessment including ‘as built’ calculations
54. Energy – BREEAM Certificate ‘Excellent’ rating
55. Land Contamination – Verification report
56. Water - No construction shall take place within 5m of a water main without info. being submitted on diversion/alignment
57. Water infrastructure - Piling

Post-occupation

58. ‘Be seen’ energy monitoring

Informatives

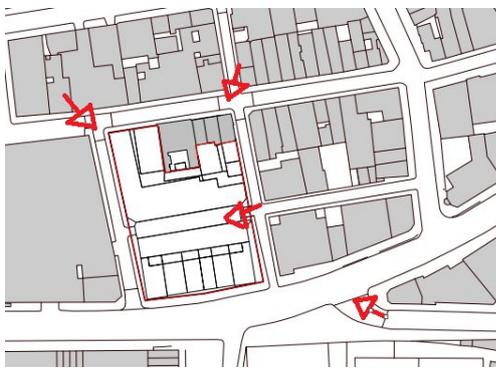
1. Permission subject to legal agreement.

2. Development is CIL liable.
3. Thames Water - proximity to assets.
4. EA informative - contamination
5. EA informative - definition of waste
6. EA informative - contaminated soil
7. In regards to condition 10 the applicant is remind that the Greenhouse Gas emissions mitigation relied on in the submitted ES are:

- Procurement of sustainable materials
- Reuse / recycle of waste materials
- Use of recycled hoarding and fencing
- Efficient construction transport routes
- Air source heat pump
- Travel plan

In addition, the mitigation measures recommended by the Council are:

- A strategy for better identifying, optimising and minimising GHG emissions, other than CO2 across the full life cycle of the Proposed Development.
- Produce a climate change adaptation plan – how will the proposed development be impacted by an RCP 8.5 (new IEMA Guidance), in terms of flooding, intense weather patterns, increasing temperatures over its lifetime. Consider if any new significant in-combination effects will arise as the climate changes and how to plan for this.
- Carry out a pre-demolition audit tied up with the Applicant's BREEAM Assessment.
- To mitigate overheating, the proposed development should include comfort cooling, using the proposed ASHPs.



APPENDIX A: SITE PHOTOGRAPHS

Key



Existing view from the south east on Bethnal Green Road looking towards 2 -10 Bethnal Green Road



Existing view from the north west looking down Ebor Street and part of Redchurch Street

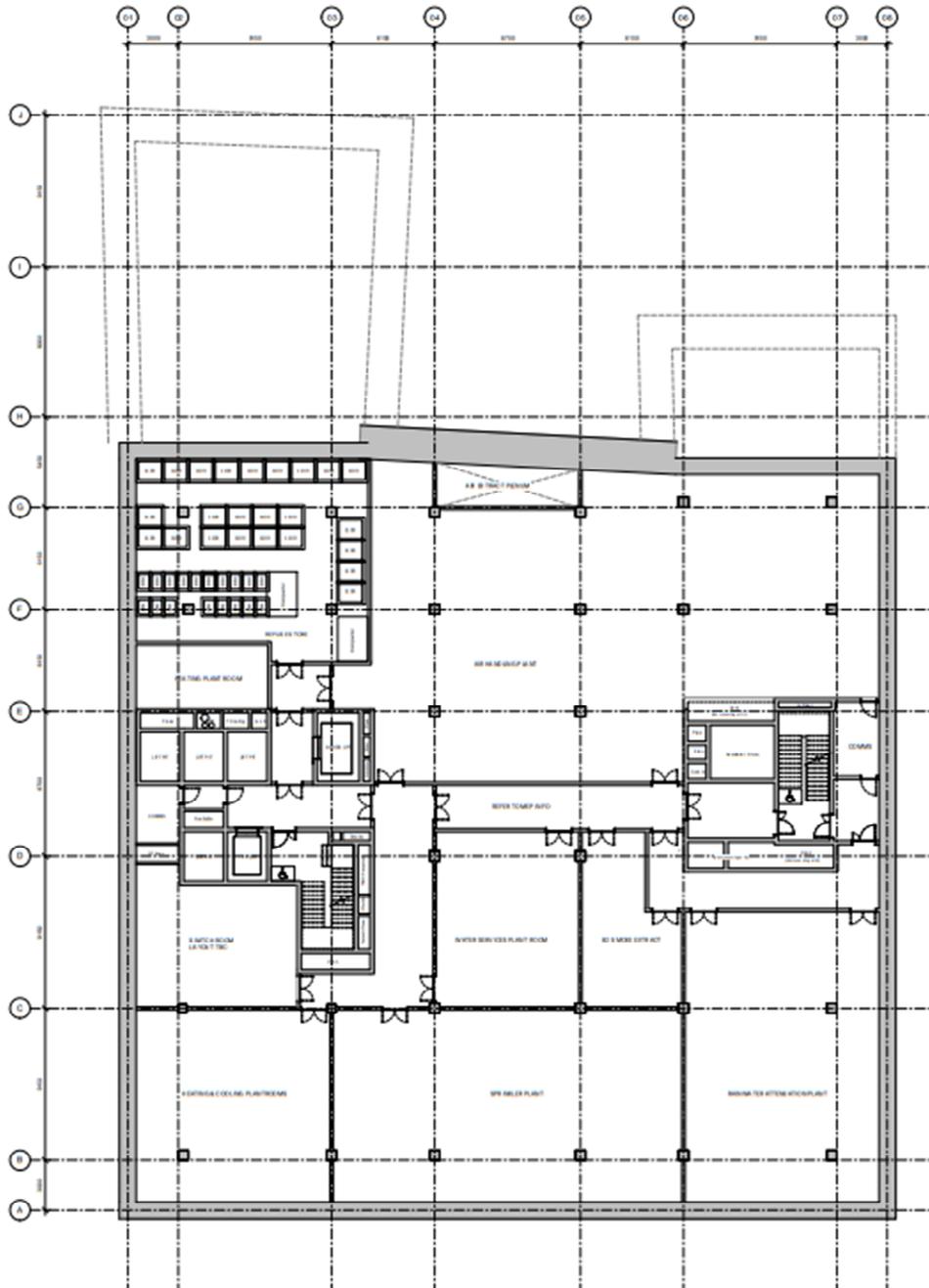


Existing view of Huntingdon Industrial Estate service yard looking west towards Shoreditch House and the Tea & Biscuit Building

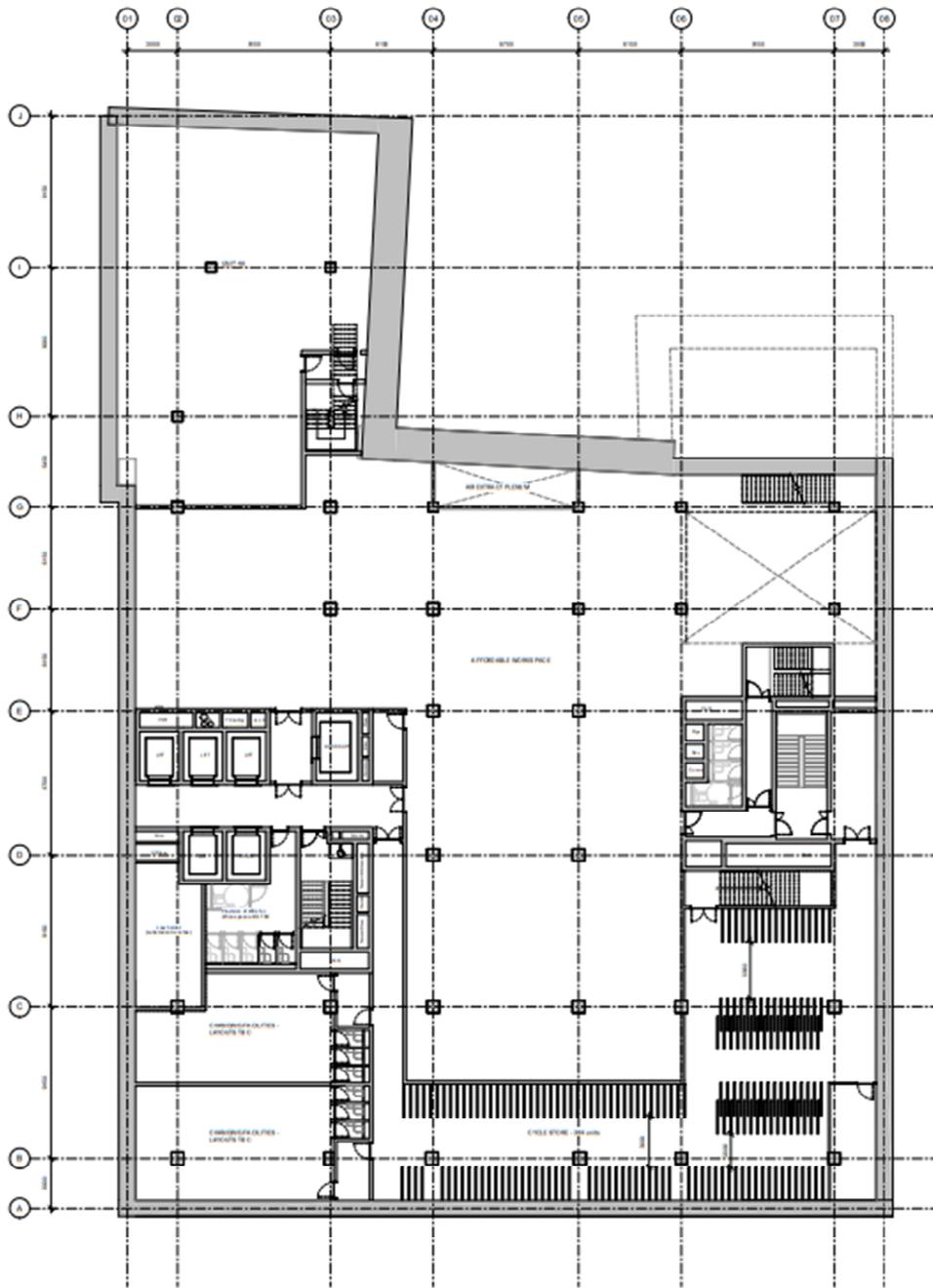


Existing view from the north east looking down Chance Street and part of Redchurch Street

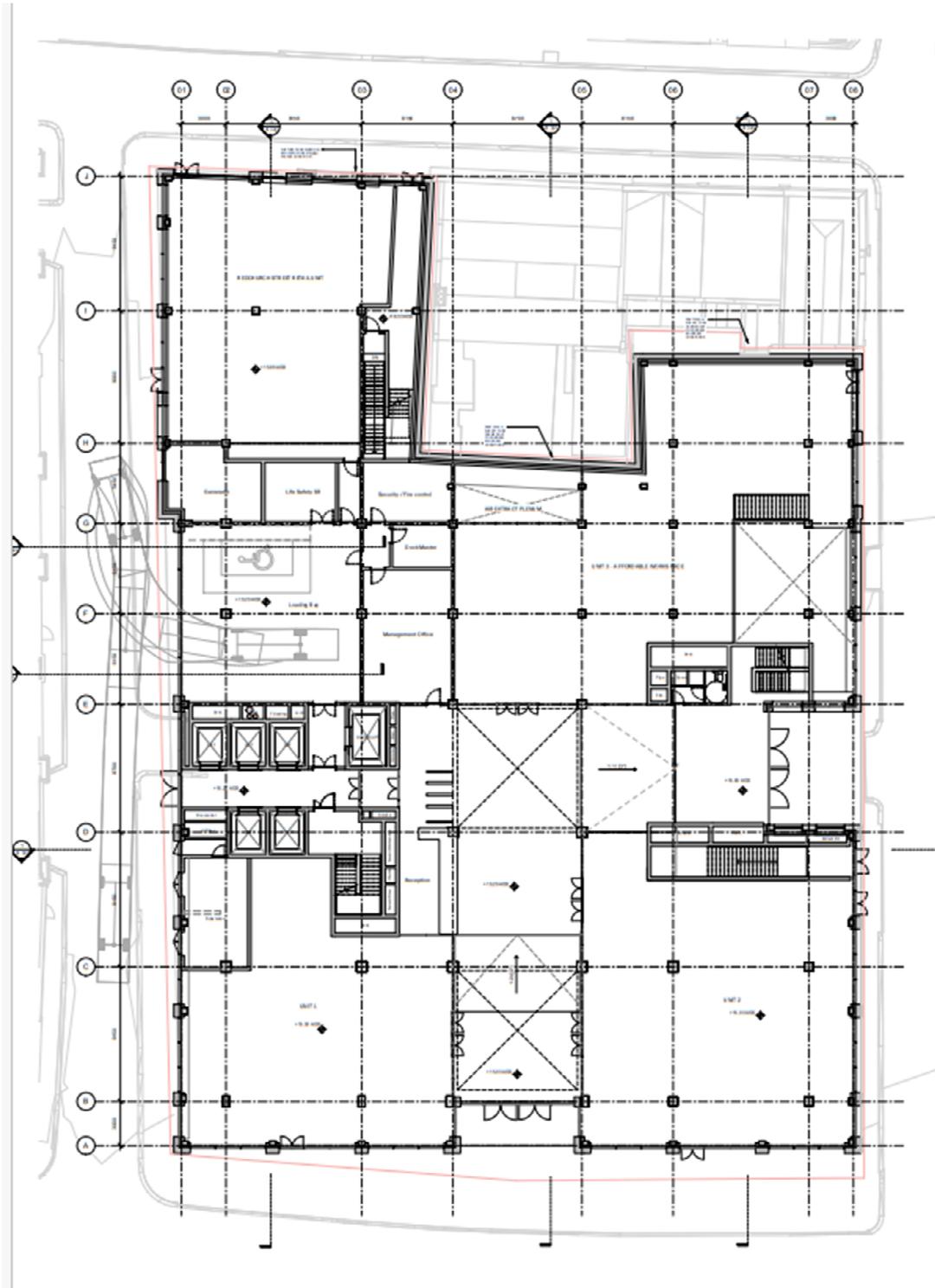
APPENDIX B: SELECTED DRAWINGS



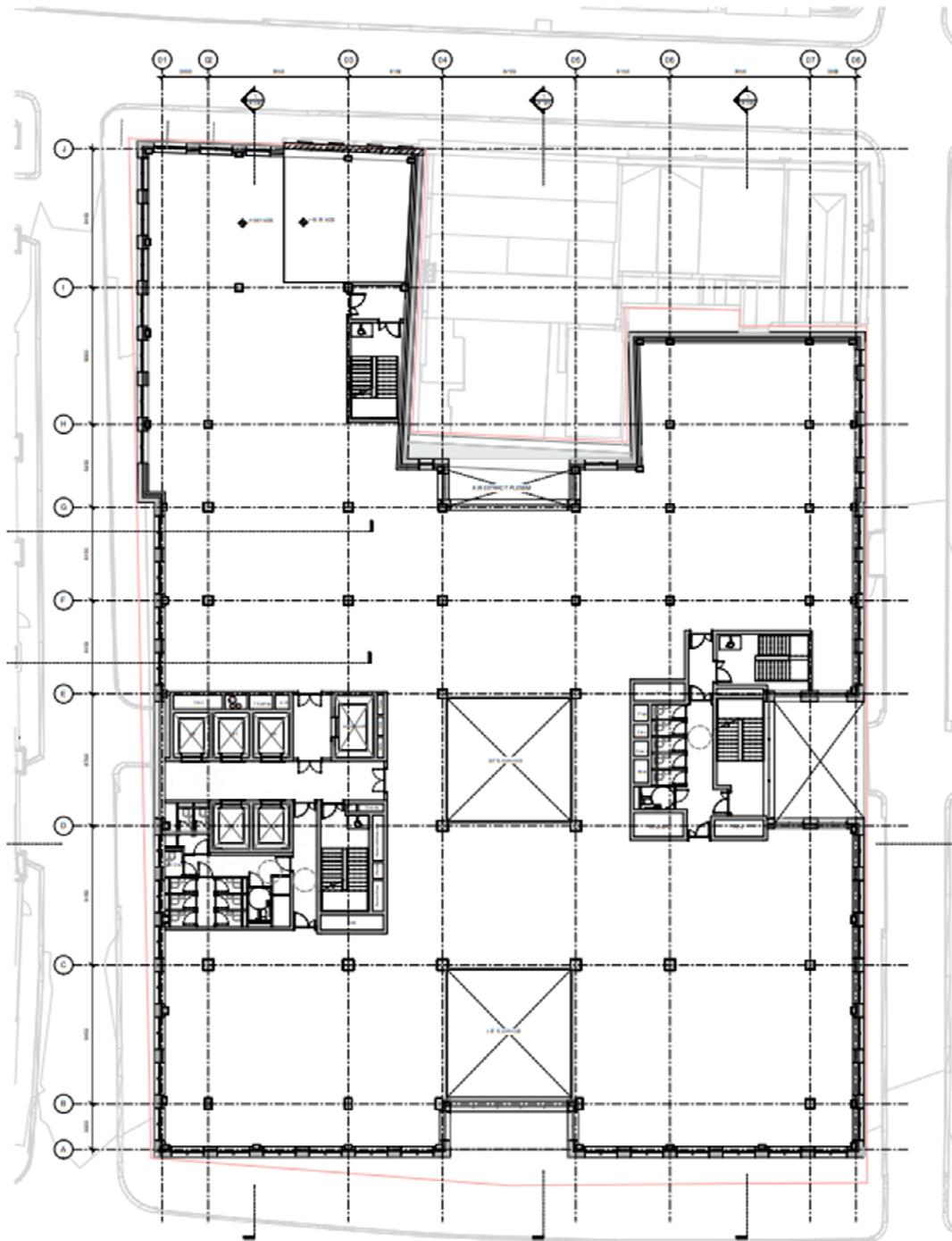
Proposed second basement plan



Proposed first basement plan



Proposed ground floor plan



Proposed first floor plan



Proposed front (south) elevation



Proposed rear (north) elevation

Proposed side (east) elevation



Proposed side (west) elevation



Proposed section