STRATEGIC DEVELOPMENT COMMITTEE

14 July 2021

Report of the Corporate Director of Place

Classification: Unrestricted

Application for Planning Permission *click here for case file*

Reference	PA/20/02509
Site	Land at Blackwall Yard, Blackwall Way, London, E14 2EH
Ward	Bromley North
Proposal	Phased redevelopment of the site and construction of 5 buildings (with maximum heights of between 9 and 39 storeys) comprising residential dwellings of mixed tenure, primary school & nursery, commercial, business & service floorspace, communal floorspace, public house, realignment of & environmental improvements to Blackwall Way, associated car & cycle parking, landscaping & public realm works (including alterations to the existing graving dock), installation of plant and associated works. External repairs and alterations to Grade II listed graving dock. This application is accompanied by an Environmental Statement.
Summary Recommendation	Grant planning permission with conditions and planning obligations
Applicant	Hadley Blackwall Yard Property Limited
Architect/agent	*Architects:* Glen Howells Architects White Arkiteker Panter Hudspith *Planning Agent:* Avison Young
Case Officer	James Woolway
Key dates	- Application registered as valid on 03/12/2020 - Neighbour letters issued 07/01/2021 - Site notices erected 07/01/2021 - Press advert issued 14/01/2021 - Public consultation finished on 13/02/2021

EXECUTIVE SUMMARY

The application proposes the comprehensive redevelopment of the private staff car-park associated with the adjacent data centre, and the application site boundary represents the entirety of the Reuters Ltd., a Site Allocation as designated within the Tower Hamlets Local Plan (2020). The scheme proposes the erection of 5 buildings on site, varying in maximum

heights of between 9 and 39 storeys, including a 2FE primary school and accommodating 898 new homes. The scheme proposes a policy compliant mix of affordable housing at 35% with a 70:30 split in favour of social rented tenure, representing an overall offer of 263 new affordable homes within the scheme.

In addition to the residential and education uses on site, the scheme provides for over 1,500sqm of commercial and retail spaces spread throughout the scheme at ground and lower levels which would provide activation and vitality for the site as well as the local community. A 'Community Hub' is included within the primary plot on site which will allow for public access and utility for local residents in addition to those of Blackwall Yard.

The application seeks to maximise public access to and through the site along the Thames Path and includes the restoration and enhancement of the Grade II Listed Blackwall Yard Graving Dock which has not benefitted from public access for a considerable length of time. Associated with the redevelopment are a suite of improvement works to the public highway along Blackwall Way, as well as the removal of parking along this space to create a more pedestrianised interface with the site allocation.

The scheme has been designed in a collaboration between three architecture practices comprising Glen Howells Architects (GHA), White Arkitekter, and Panter Hudspith. The three firms have worked in consort to create a scheme which has varying but complementary architecture creating a mix of high-quality built form across 4 'Development Plots'. The landscape strategy has been prepared by LDA Design and includes a diverse mix of high-quality character areas and public open space which will provide considerable public benefits for a range of users.

The proposal provides considerable public benefits by way of delivering high quality and well-integrated affordable homes, the delivery of a new primary school, enhancement of a underutilised and dilapidated historic asset as well as the improved linkages, public open space and commercial and retail offering for local and future residents of the area.

The submission of the scheme represents over 2-years of proactive engagement with the Council and local community and has been designed to limit impacts to neighbouring properties and residents. As such, it is recommended that the scheme be granted conditional planning permission.

The application is accompanied by Listed Building Consent for the works (PA/20/02510) related to the Grade II Listed Graving Dock, as such this report considers both applications jointly.

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

Planning Applications Site Map PA/20/02509

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

TOWER HAMLETS

London Borough of Tower Hamlets

Scale: 50m grid squares

Date: 06 July 2021**OW**

1. SITE AND SURROUNDINGS

1.1 The application site is approx. 1.9ha located on the northern side of the Thames River, immediate opposite the Greenwich Peninsula and bound to the north by Blackwall Way – the primary access to the site. Immediately abutting the east of the site is the Virginia Quay Estate, a large residential development consented in the 1990s as well as Longitude House, a tall residential development consented in 2012. The western boundary of the site is shared with a large data-centre and associated sub-station, owned and operated by Telehouse.

1.2 The existing use of the site is as a private car-park for use by staff of Telehouse, and maintains no public access from any point. The current boundary conditions of the site are typified by security fencing and gates to the shared boundary with Virginia Quay. It is noted that the red-line boundary encompasses an overgrown vegetated patch of land which now benefits from a meanwhile use as allotments for benefit of the residents to John Smith Mews during the redevelopment of the land.

Figure 1: Aerial Image of Application Site (Google Earth)

1.3 While broadly undeveloped and almost wholly hard surfaced, the site includes the Grade II Listed Blackwall Yard Graving Dock which is the remaining extents of the historical maritime industrial use of the site dating back to the 17th Century. The dock has been substantively modified over time, and has fallen into some disrepair following its partial demolition associated with an approved consent in 1988.

1.4 The site benefits from strong public transport links given its immediate proximity to the East India DLR station and bus services along Blackwall Way. The site is in very close proximity to Aspen Way which is a large multi-lane arterial road which bisects the Borough in an east-west fashion and severs the site from the northern extents of Blackwall as well as South Poplar and the associated Poplar Neighbourhood Centre. The site represents a link in the chain of the Thames Path, which seeks to connect pedestrians and cyclists along the River Thames in a contiguous fashion.

1.5 The prevailing character of the area is mixed, with a blend of low to medium rise residential character defining the eastern surrounds while complemented by larger floor plate office and specialist function floor space such as those at The Republic and Telehouse Data Centre. Further to the west the prevailing character is designed by New Providence Wharf, a contemporary high density residential development accompanied by hotel and small scale commercial uses.

1.6 The scale of the wider area transitions from the east between 4-12 storeys to the west at Virginia Quay, across to the taller components of New Providence Wharf which are characterised by a pair of towers rising between 27 and 42 storeys in height. These towers are accompanying by a series of similarly contemporary buildings of approx. 12-storeys. To the north of the site, across Aspen Way, the character is immediately lower rise goods storage and residential uses abutting the Naval Row Conservation Area, before rising to the taller components of Blackwall Reach which rise to 23-storeys in height and form part of a broader masterplan area reaching over 35-storeys in height under an Outline consent.

1.7 The key relevant designations for the site are as follows:

- Reuters Ltd. Site Allocation 4.10 (S.SG1)
- Blackwall Tall Building Zone (D.DH6)
- Isle of Dogs and South Poplar Opportunity Area (SD1)
- Tower Hamlets Isle of Dogs and South Poplar Sub-area (S.SG1)
- Borough-wide Air Quality Management Area (AQMA) (NO2 objective and 24-hour mean PM10 objective)
- Blackwall Character Area (Tower Hamlets Local Plan 2031)
- Archaeological Priority Area 2.17 (Blackwall) (S.DH3)
- Green Grid Buffer Zone (D.OWS3)
- Predominantly within area of sub-standard air quality (D.ES2)
- Flood Zone 2/3A (D.ES4)

2. **PROPOSAL**

2.1 The application proposes the comprehensive redevelopment of the car-park and associated land of Blackwall Yard. The development would comprise 5 buildings on site between 5-39 storeys in overall height, a new 2FE primary school, redevelopment of the Grade II Blackwall Yard Graving Dock, and associated landscaping and public realm improvements. The scheme also proposes improvements to the public highway associated with Blackwall Lane, and enhancements to cycle parking provision at East India DLR.

2.2 The scheme seeks to provide for 898 new residential units, including 263 affordable homes constituting 35% affordable housing by habitable room at a 70:30 tenure split in favour of social rent. The social rented units will be split 50:50 between London Affordable Rent (LAR) and Tower Hamlets Living Rent (THLR).

Figure 2: Southern Aspect CGI

Buildings

2.3 The scheme comprises four development plots (reference within this report as Plot 1, 2 3 & 4 respectively and as detailed in the below Figure), all contain buildings of varying scale, use and design. The overall landscaping masterplan ties these four plots together.

2.4 Located on the north-west edge of the application site, Plot 1 represents the largest built form on the site and provides for a mix of functions and uses. Two tower blocks of 34 (119.15m AOD) and 39 (136.30m AOD) storeys, respectively are set above an approx. part 4 and part 7 storey podium which accommodates residential and public amenity space, commercial floorspace and a 'community hub'. The tower blocks provide for mixed tenure housing, while the podium provides the primary access to the Plot and provides for mixed tenure amenity space, play space, and access to the Community Hub at the lower levels. The ground floor of the podium accommodates a mix of commercial and retail blocks, as well as the primary servicing routes, cycle parking and accessible parking bays.

2.5 Plot 2 represents the lowest scale of built development on site, and comprises a part 5 and part 9 storey block running parallel to the adjacent John Smith Mews at the site's eastern boundary. The Plot contains a 9-storey residential block to the northern edge, with the 2FE primary school. At ground level Plot 1 and 2 form the primary entrance to the site, which forms part of The Lane character area within the landscaping strategy.

2.6 Plot 3 falls to the south of Plot 2 and consists of a 15 storey block, with the lower levels forming a 'base' and 'middle', being of a notably different architectural appearance. Plot 3 is the southern-eastern riverfront building on the site and consists of almost wholly residential accommodation at upper levels. The ground floor accommodates a commercial unit to the north-western corner, and a large restaurant/public house comprises the bulk of the southern frontage to the river.

2.7 Plot 4 is the remaining development plot, and accommodates the third tallest tower block on site at 20-storeys within the south-western corner of the site at the interface with the Telehouse data centre. The block is overwhelmingly residential, with a resident wellness, gym, lounge and break out spaces with associated cycle parking and servicing making up the ground floor.

2.8 No basement levels are proposed.

Figure 3: Indicative layout of Development Plots

Land uses

Table 3: Proposed uses

Use	Use Class	GIA Sqm
Residential*	C3	84,952
Flexible commercial units	E	1,561.8
Pubic House**	*Sui Generis*	665
Primary school	D1	2,966
Total floorspace		89,480

* Excluding deck & roof access areas
**Flexible E/Sui Generis use class – included in total area of Class E

Car parking

2.9 The scheme would be car free which the exception of parking for disabled people. At consent 45 accessible car-parking spaces will be provided representing an overall provision of 5% across the development. 3 additional spaces will be provided for the 'zero-carbon' car club spaces.

Public Realm

2.10 The scheme comprises of a series of distinct character areas making up the landscaping and public realm of the site, with one of the area comprising the restoration and enhancement works to the Grade II Listed Graving Dock. These areas are referenced within the report (and within the Figure below) as:

- Blackwall Way
- The Lane
- The Square
- The Dock
- Meridian Gardens
- Riverside and Meridian Square

Figure 4: Landscaping Character Areas

3. RELEVANT PLANNING HISTORY

PA/20/02510/NC – Pending Determination *(Associated Listed Building Consent)*

Phased redevelopment of the site and construction of 5 buildings (with maximum heights of between 9 and 39 storeys) comprising residential dwellings of mixed tenure, primary school & nursery, commercial, business & service floorspace, communal floorspace, public house, realignment of & environmental improvements to Blackwall Way, associated car & cycle parking, landscaping & public realm works (including alterations to the existing graving dock), installation of plant and associated works. External repairs and alterations to Grade II listed graving dock.

This application is accompanied by an Environmental Statement.

PA/03/01515/EX – Permitted 15/07/2005

Redevelopment to provide six buildings of 11 to 29 storeys comprising 708 residential units (C3) and leisure (D2), non-residential institution (D1), business (B1a) and retail (A1,A2,A3) uses, new open space, access arrangements and car parking. Involves works to listed dock structure.

Application includes the submission of an Environmental Statement under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999.

PA/03/01517 – Permitted 15/07/2005

Works to dock structure in connection with redevelopment of site.

PA/00/00267/A1 – Permitted 22/06/2001

Development to provide 735 residential units; 29,500 sq. metres hotel floorspace in a building approx. 85.85 metres high; 42,600 sq. metres office accommodation; retail; a restaurant; a health club; car parking; riverside walkway; landscaping; and public open space.

4. PUBLICITY AND ENGAGEMENT

Pre-application

4.1 The submitted Statement of Community Consultation, prepared by London Communications Agency (LCA), sets out the non-statutory consultation undertaken by the applicant and how this influenced the application and revisions to it. The engagement was split across a series of Phases with the general public, focus groups and key stakeholders as well as a pre-application presentation to the Borough's Strategic Development Committee in June 2020.

4.2 The final stage of engagement between August and September 2020 was conducted virtually with the agreement of the Council due to the Covid-19 pandemic and associated restrictions. The phases are detailed below:

- **Phase 1 (November 2019):** Initial engagement with Virginia Quay residents and other key stakeholders to introduce the Applicant, the site and the early development principles. This included two drop-in sessions held exclusively for residents of the Virginia Quay Estate, one taking place at the local community hall and the second in the Radisson Blu Hotel which neighbours the site

- **Phase 2 (Jan – Feb 2020):** A public exhibition, open to all, on the Applicant's early thinking for the Site. Publicised extensively and staffed at all times by the Applicant and project team. This exhibition was also supported by an online presence, including a dedicated website and online polling promoted through social media.

- **Phase 3 (Aug – Sept 2020):** A digital-led consultation on the final designs for the Site. This included the design and publishing or a panoramic virtual exhibition space which could be accessed from home (following discussions with the Council and due to the Coronavirus pandemic) and was publicised extensively through letters and printed adverts, accompanied by online animations requests feedback on the proposals. This final phase of engagement also included a presentation to the Council's Strategic Development Committee.

4.3 As noted within the SCI, residents and those engaged showed strong levels of support for the redevelopment of the site with particular enthusiasm for enhancements to the Graving Dock, access to the River, and provision of new local shops and restaurants. Emphatic support was shown for the opening of the Thames Path, while some residents remained concerned with respect to the inclusion of tall buildings within the site.

Statutory application consultation

4.4 The application was consulted with the public by way of 5x planning notices erected locally on 05 January 2021, a press notice published on 14 January 2021, and 2,513 neighbour letters were issued on 07 January 2021. As such, the 30 day statutory consultation period for the application ended on 13 February 2021.

4.5 Representations were received from the local community as a result of the Council's consultation process during the course of the application and are summarised below.

4.6 **24** Individual objection letters received. It is noted that a number of objection letters related to demolition works unrelated to the merits of this application, but have been duly noted below.

4.7 **83** letters of support from the local community, including one from a Member of the London Assembly received. It is noted that many of the letters of support have been issued by way of pro-forma letter, and two letters have been received from Organisations registered outside of the Borough.

4.8 The material considerations raised within the objections are summarised below

- Thames Path (and associated Anti-Social Behaviour (ASB))
- Overshadowing (inclusion of daylight/sunlight loss)
- Construction noise and disturbance
- Loss of outlook
- Quantum/scale of development
- Demolition impacts
- Nuisance associated with new potential public house
- School siting (in relation to potential public house)
- Flood risk
- Traffic congestion
- Servicing/delivery
- Insufficient details
- Light spill
- Noise
- Air quality

4.9 The material considerations raised within the support letters are summarised below

- Affordable housing
- New Community Hub
- Thames Path opening
- New local commercial and retail
- New homes
- New open and public spaces
- New primary school
- Sustainable transport initiatives
- Open water swimming

5. CONSULTATION RESPONSES

5.1 Below is a summary of the consultation responses received from both external and internal consultees.

External responses

Cadent/National Grid

5.2 (i) Low or Medium pressure (below 2 bar) gas pipes and associated equipment are in the vicinity (ii) work needs to be accrued out in accordance with published guidance.

[Officer Comment: An informative will be placed on consent reminding the Applicant of their obligations in relation to infrastructure safeguarding and licencing.]

Crossrail Safeguarding

5.3 No objection, subject to conditions.

[Officer Comment: Recommended conditions to be applied to consent.]

Crime Prevention (Metropolitan Police)

5.4 No objection, subject to conditions.

[Officer Comment: Recommended conditions to be applied to consent.]

Docklands Light Rail (DLR)

5.5 No objection in principle, but a condition was originally requested requiring further submission of construction details prior to commencement and a restriction on operable windows facing onto DLR assets.

[Officer Comments: Following further discussion with TFL and DLR, it was considered that the proposed condition is unreasonable given the distance between DLR assets and the application site. DLR advised in June 2021 that the additional conditions were not required, and only a baseline radio survey needs to be conditioned. This condition will be placed on consent.]

Environment Agency

5.6 Initial objection on flood risk grounds. Following submission of further information on February 25, objection removed and request inclusion of conditions.

Full comments detailed and discussed in Flood Risk & Drainage section of the report.

[Officer Comment: Recommended conditions to be applied to consent.]

Greater London Archaeological Advisory Service (GLAAS)

5.7 GLAAS officers note that while there is likely to be buried remains given the extensive history of the site, that the lack of basements and sub-structures mean that no further pre-determination work with respect to archaeology is required and request a series of conditions be applied to the consent.

5.8 Officers also note that while they will defer to LPA Conservation Officer comments with respect to heritage impact to the Graving Dock, they would welcome a more ambitious and detailed interpretation strategy which celebrates the history of the Dock. As such, a further condition relating to public interpretation is requested.

[Officer Comment: Recommended conditions to be applied to consent, with applicant response to consultation and assessment of heritage/archaeology impacts discussion in the relevant sections below.]

The Gardens Trust

5.9 No comments received.

Historic England

5.10 Officers note that the works to the Grade II Listed Graving Dock fail to grasp on the opportunity of revealing more of the original dock structure, and do not support the subdivision and filling of part of the dry dock with water. Conditions as recommended by GLAAS (detailed below) are supported by HE, and are similarly recommended.

[Officer Comment: Recommended conditions to be applied to consent, with applicant response to consultation and assessment of heritage impacts discussion in the relevant sections above.]

Historic Royal Palaces

5.11 No comments received.

London Fire Brigade

5.12 No comments received.

[Officer Comment: Notwithstanding the lack of formal response, a final Fire Strategy will be secured as part of a condition upon consent.]

London Borough of Greenwich

5.13 No comments received.

London Borough of Newham

5.14 No comments received.

London City Airport

5.15 No objection to the proposal. London City Airport recommends conditions relating to light pollution, bird/green roof management, cranes/scaffolding, and construction methodology.

[Officer Comment: Recommended conditions to be applied to the consent.]

Marine Management Organisation (MMO)

5.16 No comments received.

Maritime Greenwich World Heritage

5.17 No comments received.

Mayor of London (GLA Stage 1 Report)

5.18 The Mayor of London, through the GLA case officer, prepared a Stage 1 report on the application which, while fundamentally supportive of the application, made a series of recommendations as summarised below:

- Further Information relating to the estimated energy costs for occupants, potential connection to the district heating, heat pumps and the 'Be seen' monitoring is required. In addition, further assessment of overheating is required and the applicant should demonstrate that the provision of PV has been maximised. The applicant should also confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough.

- Further confirmation or clarifications, however, relating to material quantity and end of life scenarios, material types and quantities, maintenance, repair and replacement cycles and estimated mass (kg) of reusable and recyclable materials for each building element category.

- Further improvements to the Urban Greening Factor sought

- The applicant should demonstrate how a maximum of 105 l/s/day would be achieved as per Policy SI5 of the Publication London Plan. For the non-residential components, information on a shell and core BREEAM pre-assessment has been provided, with water consumption excluded. The applicant should include water re-use/rainwater harvesting to reduce consumption of water across the development.

- In accordance with Policy SI7 of the Publication London Plan a circular economy statement has been submitted with the application, which is welcomed. Further

information on a number of matters including gross internal area, Bill of Materials, recycle waste and operational waste, however, should be provided.

- The applicant should clarify the split between London Underground trips at Canning Town and at Canary Wharf. Station capacity assessments should be done for both stations and a line loading assessment of the Jubilee line should be submitted for agreement with TfL. Given the relative remoteness of the nearest LU station, the applicant should also submit a 'first mode analysis' for trips to access Canary Wharf and Canning Town stations. These trips should be included in the summary table of all trips.

- DLR Train Capacity Guidance, which can be obtained from TfL, should be used to analyse this along with the updated trip generation figures which are expected to be higher than currently set out. A line loading assessment of DLR should be submitted to be agreed with TfL.

GLA officers also request that public access to the primary school MUGA, residential amenity access, scheme of interpretation, S278 highway works, parking management, and Thames Path access be secured through S106 agreement. Condition relating to transport, heritage, materials, and construction management are also sought.

[Officer Comment: All above points have been addressed during the submission of the application, with specific details relating to sustainability, transport and energy considered within the relevant sections of the report. S106 obligations, where practical and applicable have been considered and secured, as with the recommended conditions.]

Natural England

5.19 Advise of no comment to make.

National Air Traffic Services (NATS)

5.20 No objection.

Port of London Authority

5.21 The Port of London Authority provided general comments relaying their support for the use of freight by water, and would recommend a condition requiring the full Construction Logistics Plan to expand on using this service. Further comments and support received with respect to the indicative provision of life saving equipment and riparian ecology initiatives, and also recommending this be conditioned upon consent. Final comments welcome endeavours within the submitted lighting strategy which highlights lower luminance levels at the river edge to minimise light spillage towards the river.

[Officer Comment: Specific note will be made within the CLP condition relating to use of freight by water, and details of both riverwall ecology and life saving equipment will be conditioned.]

Georgian Society

5.22 Object to the proposed works relating to the Listed Graving Dock, and advise that they consider the collection of buildings within the proposal to cause less than substantial harm to the All Saint's Church. The Society objects to only a small amount of the dock being filled with water.

[Officer Comment: The Georgian Society objection is discussed within the Heritage section of this report.]

Thames Water

5.23 No objection to the proposed works. Makes note that at present water infrastructure needs to be upgraded to accommodate the development. An occupation control is recommended on consent to ensure the infrastructure is able to support residents at occupation.

[Officer Comment: Conditions and informatives to be applied.]

Transport for London – Land Use Planning

5.24 Detailed comments in addition to the Mayor's Stage 1 Report were received 5 March 2021 and were in principle strongly supportive of the removal of the car-park and its redevelopment, but requested further information with respect to:

- A revised trip generation assessment should be provided and agreed with TfL.
- A contribution towards improvements at Prestons Roundabout and walking /cycling connections in the vicinity of the site is expected.
- Thames Path should be fully opened upon first occupation and secured via a s106 agreement.
- The mobility hub is expected to be secured by condition.
- The Delivery and Servicing Plan should be amended to show the expected number of weekly/daily delivery and servicing trips.
- A full Construction Logistics Plan should be secured by condition.

[Officer Comment: Further information with respect to trip generation was provided and considered acceptable, while a contribution towards the Prestons Road Roundabout was considered not required following further discussions with the applicant with respect to appropriateness. Suggested conditions will be secured on consent.]

Victoria Society

5.25 The Society objects to the infilling of the Graving Dock, and recommend that is should be filled wholly with water. They note that the Dock appears subordinate to the rest of the development, and the proposed decking, and planting is inappropriate and harmful.

[Officer Comment: The Victorian Society objection is discussed at length within the Heritage section of this report. It is noted, however, that the Blackwall Yard Graving Dock functioned solely as a 'dry-dock' during it's operational years, and both LBTH Conservation and Historic England officers preference would be to reflect this character..]

Internal responses

LBTH Biodiversity

5.26 Officers raise no objection to the scheme, but make observation with respect to the proposed biodiversity enhancements, potentially protected aquatic species which need to be considered, as well as noting the Local Biodiversity Action Plan (LBAP) benefits associated with various parts of the scheme. The officer makes a series of recommendations with respect to enhancing biodiversity on site, and recommends the inclusion of a condition relating to a comprehensive biodiversity enhancements submission.

[Officer Comment: General comments reflected and considered within the Biodiversity section of this report, recommended condition will be secured on consent.]

LBTH Design & Conservation

5.27 Design and conservation officers broadly support the architectural and design approach of the scheme. Conservation officers note that the proposed approach towards the listed dock enhancements could be more heritage led, while noting that this potential harm to the asset must be weighed against the considerable public benefits of the scheme.

Full comments are included within the Design & Heritage section of the below report.

LBTH Education

5.28 Education team welcome the delivery of the 2FE school on site, following a comprehensive pre-application process.

Full details of the school, and how it will be secured within the consent included in the relevant sections below.

LBTH Energy Efficiency/Sustainability

5.29 No objection, request a carbon off-setting contribution of £1,571,775 be secured within the S106 to address the remaining carbon needing to be off-set against the observed baseline.

[Officer Comment: Financial contribution agreed and to be secured within the S106.]

LBTH Environmental Health (Contamination)

5.30 No objection subject to standard conditions.

[Officer Comment: Recommended conditions to be applied to consent.]

LBTH Environmental Health (Air Quality)

5.31 Concerns raised with respect to the submitted air quality assessment accompanying the Environment Statement. Primary concerns related to odours relating to adjacent diesel generators have not been assessed, pollutant concentration with adjacent data centre generators, use of traffic data, as well as a general concern on the modelled baseline of air quality on site. LBTH Air Quality Officers note that while previous agreement on modelling baselines were agreed, a more representative model should be pursued at this stage.

[Officer Comment: It is noted that the above air quality points, as raised by Temple Group in their role as EIA reviewers, as well as LBTH Air Quality Officers, have been resolved through the application process and is considered in more detail in the Air Quality section within this report.]

LBTH Environmental Health (Noise)

5.32 No objection subject to standard conditions. It is noted that further concerns were raised by Temple Group as part of the EIA review, which is detailed in the body of this report. Conditions have been recommended to address these impacts, and are discussed in greater detail in the relevant section.

[Officer Comment: Recommended conditions to be applied to consent.]

LBTH Health Impact Assessment Officer

5.33 Initial concerns raised with respect to the robustness of the open space and play space considerations within the submitted HIA, and request that a recommendations section be included to reflect this. Subsequent amendments including a further consideration of the health impacts associated with the shortfall of play space, and access to open space submitted.

[Officer Comment: Subsequent to further information, LBTH Public Health satisfied with the reporting of the health impacts within the scheme. Recommend securing the play space and open space improvements as discussed within the body of this report as suitable mitigation measures. It is noted the relevant improvements to open space, play space, and financial obligations will be secured through the consent as requested.]

LBTH Growth & Economic Development

5.34 End-user and construction phase contributions requested, as detailed within the S106 schedule at the bottom of this report. Non-financial employment and enterprise obligations to also be secured to ensure best endeavours are made to hire and train local persons.

[Officer Comment: Financial and non-financial obligations to be secured within the consent.]

LBTH Housing

5.35 Housing officers welcome the provision of affordable housing within the scheme, and are generally satisfied with the proposed unit mixes – notwithstanding the ambition for greater family sized units within the intermediate tenures. Officers query the suitability of the mixed cores within Plot 1 which integrates the housing across the entire plot, and inquiries whether the applicant has engaged within any Registered Providers (RPs) in their discussions to date. While officers welcome the shared communal spaces within the development, they would like reassurances that the rent levels prescribed can be achieved with respect to service charge. Officers request that full details of the wheelchair housing, including access strategy, be provided as a condition.

Full comments are incorporated within the 'Housing' section of this report.

[Officer Comment: all aspects of the housing are discussed within the Housing part of this report, however it is noted that the above comments have been addressed through the application and that a commitment to LBTH required rental levels and splits within the social rented tenure will be secured within the S106.]

LBTH Infrastructure

5.36 No comments received.

LBTH Policy

5.37 Officers view the scheme as broadly policy compliant with respect to Local Plan policies relating the Tall Buildings, Isle of Dogs and South Poplar Opportunity Area, the quantum of outside of centre retail, broad compliance with housing provision and recognition that the application provides for all the infrastructure requirements as set out by the Reuters Ltd. Site Allocation.

[Officer Comment: Full consideration of policy comments given throughout the body of the report, with specific regard to land use, design and housing.]

LBTH Sustainable Urban Drainage

5.38 LBTH SUDS Officer raised initial concerns with respect to the robustness of the submitted flooding and SUDS information accompanying the application, citing concerns with respect to rainwater harvesting, drainage to the Thames, and assessments of tidal breaches/pluvial flooding. Subsequent information provided removed this objection, and a condition is requested upon the consent.

[Officer Comment: Further information supplied by Buro Happold in response to these comments satisfied the objection, and the condition will be placed on consent as requested.]

LBTH Transportation & Highways

5.39 LBTH Highways Officers are broadly supportive of the scheme, and the innovative approach taken towards a number of the transport goals within the scheme. Some points of clarification requested with respect

Full comments are incorporated within the 'Highways' section of this report.

LBTH Waste Policy & Development

5.40 No objection to the proposed Envac waste system, generally queries and observations provided around food waste streams and their management.

[Officer Comment: Further details on food waste streams included within the updated Operational Waste Strategy, and detailed within the relevant section in the report below.]

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

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

6.2 In this case the Development Plan comprises:

- The London Plan 2016 (LP)
- Tower Hamlets Local Plan 2031

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

Growth (spatial strategy, healthy development)

- London Plan policies: SD1, SD10
- Local Plan policies: S.SG1, S.H1, D.SG3

Land Use (town centre, social infrastructure, residential, employment)

- London Plan policies: SD6, SD7, SD8, SD9, S1, S2, S4, H1, E11
- -Local Plan policies: S.TC1, D.TC2, S.CF1, D.CF2, D.CF3, DS.H1, S. EMP1, D. EMP2

Housing (housing supply, affordable housing, housing mix, housing quality, fire safety, amenity)

- London Plan policies: GG2, H1 H4, H5, H6, H8, H10, S4
- Local Plan policies: S.H1, D.H2, D.H3,

Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage)

- London Plan policies: D1, D2, D3, D4, D5, D8, D9, HC1, HC3, HC4
- Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, D.DH6, D.DH7

Amenity (privacy, outlook, daylight and sunlight, noise, construction impacts)

- London Plan policies: D3, D6, D9, D14
- Local Plan policies: D.DH8

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

- London Plan policies: T1, T2, T4, T5, T6, T6.1, T7, T8
- Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4

Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste)

- London Plan policies: G1, G4, G5, G6, SI1, SI2, S13, S14, SI5, SI7, SI8, SI12, SI13
- Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.MW1, D. OWS3, D.MW3

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

- National Planning Policy Framework (2019)
- National Planning Practice Guidance (as updated)
- LBTH Planning Obligations SPD (2021)
- LBTH High Density Living SPD (December 2020)
- LBTH Community Infrastructure Levy (CIL) Charging Schedule (2020)
- LBTH Development Viability SPD (2017)
- LP Affordable Housing and Viability SPG (2017)
- LP Housing SPG (updated 2017)
- LP Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Building Research Establishment's Site Layout for Daylight and Sunlight: A Guide to Good Practice (2011)

- Isle of Dogs and South Poplar Opportunity Area Planning Framework (2019)

6.5 The following draft guidance is relevant, although it has limited weight:

- LBTH Draft Reuse, Recycling & Waste (Consultation draft January 2021)

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

i. Land Use
ii. Housing
iii. Design & Heritage
iv. Neighbour Amenity
v. Transport
vi. Environment
vii. Infrastructure
viii. Local Finance Considerations
ix. Equalities and Human Rights

Land Use

Residential use

7.2 Increasing housing supply is a fundamental policy objective at national, regional and local levels. The NPPF encourages the effective use of land through the reuse of suitably located previously developed land and buildings.

7.3 The application site relates to the entirety of the Reuters Ltd. Site Allocation (4.10) within the Tower Hamlets Local Plan. The site allocation is identified as being primarily for delivery of new homes, with a secondary objective of re-providing existing jobs within the site allocation. This designation is reflected within the Mayor's Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF), within which the site is recognised within the Blackwall Sub-Area.

7.4 As such, it is considered that the principal use of the site for housing is supported and in line with the strategic objectives of the relevant Local Plan and London Plan polices as well as the strategic ambitions of the Reuters Ltd. Site Allocation and Isle of Dogs and South Poplar OAPF.

Two-form Entry (2FE) Primary School

7.5 A two-form entry (2FE) primary school is identified within the Reuters Ltd. Site Allocation as an infrastructure requirement. The school is intended to meet future projected demands within the Blackwall Sub-Area, and its management and disposal will be secured within the agreed Section 106.

7.6 As required, the scheme proposes the delivery of a 2FE Primary School within Plot 2 of the development. The primary school has been designed in close-collaboration with LBTH Education and design advisors as well as Panter Hudspith, the architects responsible for this plot within the application team. The school will integrate with the residential component of Plot 2 to create a well designed and consistent response to the architecture of the rest of the scheme, which is detailed in the relevant design section below.

7.7 In order to ensure that the school will meet the needs of any future operator, the layout of the scheme meets the most contemporary school requirements and benefitted from numerous dedicated education led pre-application workshops. The school building will be built out as per the consented plans, before being handed over to a school operator for fit-out.

7.8 The future management and disposal of the school will be secured within the Section 106, and will allow for the LBTH Education department to identify another education asset following commencement on site if for whatever reason the projected needs for the area remain met by existing infrastructure. This will ensure that the notable public benefits of the school within the consent remain locked into the scheme, and will continue to meet the needs of the local community.

7.9 Mindful of the above, the principle of an education asset on site is both supported and welcomed by policy.

Proposed flexible retail and commercial uses

7.10 Local Plan Policy D.TC3 requires that retail proposed outside of designed Major, District and Neighbourhood Centres must be subject to a series of policy tests and supplementary information to be considered acceptable. To ensure that new retail units outside of this recognised Centres does not undermine the viability and vibrancy of those adjacent, Polic D.TC3 requires that they be subject to sequential testing, and a impact assessment be submitted for any retail units over 200sqm.

7.11 The application site is approximate 200m from the nearest designated centre at Poplar Neighbourhood Centre; however the site, and South Blackwall more generally, suffers from acute dislocation from this Centre due to Aspen Way and limited pedestrian crossings. In pedestrian terms the site is approximately 650m from the edge of this Centre and requires elevated crossing via East India DLR or the Prestons Round underpass. Within the scheme, 1,561.8sqm of flexible commercial/retail floorspace is proposed across 10 individual units across the development, as detailed within the below Figure.

Plot	Unit	Indicative Use	Area (sq.m. GIA)
Plot 1 / Hub	1	Retail	30
	2	E-car Hub	34
	3	E-bike Hire	32
	4	Grocer	205
	5	Retail	127
	6	Cycle Workshop	33
	7	Café / Commercial / Co-working	240
Plot 2	1	Retail	91.8
Plot 3	1	Retail	104
	2	Riverside Pub (see below)	665
Total			1,561.8

Figure 5: Non-residential Use Schedule

7.12 In support of the proposal the applicant has included a Retail Impact Assessment within the submitted Planning Statement, which assessing the likely impact of the out of centre retail within the scheme. It is noted that the overall proportion of commercial floorspace within the scheme represents roughly 2% of the overall floorspace, and in this context is considered notably minor. It is also noticed that of the 10 proposed non-residential units, only 3 would exceed the 200sqm floorspace triggering a Retail Impact Assessment requirement, one of which is the proposed riverside public house.

7.13 The Assessment tests the likely impact on the nearby centres, while balancing against the likely demand created by the development itself and what immediate needs must be supported within the development to accommodate them. As detailed within the assessment, it is

highlighted that an anticipated 1,909 new residents will be accommodated within the site, and that any scheme should provide for some level of retail provision for these persons.

7.14 As noted above, and within public representations and the submitted Statement of Community Involvement, access to local convenience south of Aspen Way is particularly challenging for local residents and the inclusion of low-level commercial and retail uses within Blackwall Yard is strongly supported by the community. Providing for new local services while ensuring existing services aren't overburdened is viewed as being an appropriate and well planned response.

7.15 LBTH Policy Officers note that the sequential test examined the potential appropriateness of sites within two nearby neighbourhood centres and their capacity to accommodate the proposed development. The London City Island and Poplar High Street Neighbourhood Centres were examined, however both were found to be inappropriate locations to host the proposed development given size constraints and land availability.

7.16 Further to this, it is noted that it is in fact more likely that future residents will instead support these existing centres through increased footfall and local economic stimulation while simultaneously creating approximately 100 full-time jobs, and upwards of 25 additional part time jobs, for the local community.

7.17 As such, it is considered that the retail being provided through the proposed development would not prejudice the vitality of existing local centres and will instead provide for local jobs and invigorate the existing centres through increase trade and footfall owing to the additional 1,900 new residents associated with the scheme.

Housing

Housing supply

7.18 Tower Hamlets Local Plan Policy S.H1 outlines the need for the Borough to secure the delivery of 58,965 new homes across the Borough between 2016 and 2031, which equates to 3,931 new homes each year. London Plan Policy H1 sets Tower Hamlets a housing completion target of 34,730 units between 2019/20 and 2028/29. The proposed development would result in a net increase of 898 new homes, which would make an important contribution towards meeting the above target and is strongly supported.

7.19 The 2020 Housing Delivery Test (HDT) results were published on 19 January 2021 and as a result Tower Hamlets Local Planning Authority is now a "presumption authority" and paragraph 11d of the NPPF is relevant. The Council's delivery of housing over the last three years is substantially below its housing target and so paragraph 11d of the NPPF is engaged by virtue of footnote 7 of the NPPF. Nevertheless, the proposed development has been found to be in accordance with development plan policies and, therefore, consideration of para. 11(d) is not required where the recommendation is to grant planning permission (but would be if the application were to be refused).

Housing mix and Tenure

7.20 The below table details the overall schedule of housing broken down by tenure and unit type, with the Figure immediately below highlighting the distribution of tenures within the scheme. Notably, all tenures are blended throughout the scheme, encouraging truly mixed and balanced communities.

	Social Rent	Intermediate (Shared Ownership)	Market
Studio	0	0	83
1-bed	39	30	171
2-bed	57	53	321
3-bed	47	9	60
4-bed	28	0	0
Total	**171**	**92**	**635**
	898		

7.21 London Plan Policy H10 requires developments to consists of a range of unit sizes. Tower Hamlets Local Plan Policy D.DH2 also seeks to secure a mixture of small and large housing that meet identified needs which are set out in the Council's most up-to-date Strategic Housing Market Assessment (2017). This preferred housing unit mix for all tenures is set out in the 'Policy Target %' in Figure 6 below.

	Market	Intermediate	Affordable rented
1 bed	30%	15%	25%
2 bed	50%	40%	30%
3 bed	20%	45%	30%
4 bed			15%

Figure 6: Policy D.H2 Unit Mix Targets

Site Wide Distribution

7.1 The housing across the site is spread across all four development plots, with the greatest density of housing of all tenures located within Plot 1 of the proposal. While detailed in the below sections, a summary of the location of all housing, tenures and unit mix by Plot is described within the figure below. Notably, Plots 3 and 4 comprise wholly market sale units, while Plot 2 is wholly social rented, with Plot 1 representing an integrated offer of all three tenures.

Plot 1	Market	Shared Ownership	Affordable Rent	Total
Studio	1	0	0	1
1 Bed	75	30	35	140
2 Bed	186	53	55	294
3 Bed	45	9	47	101
4 Bed	0	0	8	8
Total	**307**	**92**	**145**	**544**

Plot 2	Market	Shared Ownership	Affordable Rent	Total
Studio	0	0	0	0
1 Bed	0	0	4	4
2 Bed	0	0	2	2
3 Bed	0	0	0	0
4 Bed	0	0	20	20
Total	**0**	**0**	**26**	**26**

Plot 3	Market	Shared Ownership	Affordable Rent	Total
Studio	28	0	0	28
1 Bed	42	0	0	42
2 Bed	28	0	0	28
3 Bed	8	0	0	8
4 Bed	0	0	0	0
Total	**106**	**0**	**0**	**106**

Plot 4	Market	Shared Ownership	Affordable Rent	Total
Studio	54	0	0	54
1 Bed	54	0	0	54
2 Bed	107	0	0	107
3 Bed	7	0	0	7
4 Bed	0	0	0	0
Total	**222**	**0**	**0**	**222**

Figure 7: Sitewide Distribution of Housing

Market Housing

7.2 The scheme provides for 635 units for market sale, the details of which are included in the below table against Local Plan Policy D.DH2 unit mix targets.

Unit Type	Total	Overall %	D.DH2 Target %
Studio	83	13%	No defined target
1-bedroom	171	27%	30% (-3%)
2-bedroom	321	50.5%	50%
3-bedroom	60	9.5%	20% (-11.5%)
4-bedroom	0		

7.3 As detailed in the above table, and as considered against Policy D.H2 mix targets, the scheme would notionally overprovide within the studio tenures while underproviding for family sized units in this mix. The shortfall within the larger units is effectively picked up within the studios, with 1 and 2-bedroom units broadly meeting the Council's targets within the site.

7.22 Notably, the development comprises 13% studio units, which while not recognized as a unit typology within the housing mix table of the Tower Hamlets Local Plan, or the supporting Strategic Housing MA, they are acknowledged as a unit typology in the Nationally Described Space Standards embedded within the London Plan and referenced within Policy D.H3.

7.23 Notwithstanding the absence of studio units within the Tower Hamlets Local Plan and SHMA, it is considered that the typology continues to satisfy an important housing need for single occupants if well designed within schemes. Providing for a range of homes to accommodate a variety of residents within the Borough is considered essential, and while not recognised within the Borough's Strategic Need Assessment studios remains a valid and common housing typology within market tenures locally London more generally.

7.24 When considering the overall housing mix, it is relevant to consider the impacts of the housing typologies on the viability of the scheme.

7.25 Section 4.12.2 of Policy H10 of the London Plan, "Housing Size Mix", places importance on considering housing mix in a contextual basis in determining how it best meets a need. In taking a holistic view of housing within the scheme, it is considered that the mix provides for a range of unit types and seeks to proportion them within the tenures most effective – mindful of the overall viability position of the scheme i.e. more family sized units in the affordable section, smaller sized units in the market section.

7.26 While solely with respect to unit mix the scheme fails to be policy compliant with regard to policy D.H2, it is considered that the aspiration of the policy which seeks to ensure that developments provide for a range of units across tenures is achieved to a feasible extent. Despite the reduced offer of larger sized units within the private mix, when considered holistically across both tenures, the scheme will provide for 144 new family sized units (3-bedrooms and above).

7.27 Despite the scheme not being viability tested due to the policy complaint provision of affordable homes within the scheme, it is further noted and accepted by LBTH Housing Officers that larger sized market and intermediate units are typically less productive within development viability appraisals, and rarely offer meaningful family accommodation given their associated costs. As noted within the evidence base for the Council's High Density Living SPD, 42% of families within Tower Hamlets live within 1 or 2-bedroom units, and as such it remains likely that market housing at less than 3-bedrooms will continue to provide homes for families within Tower Hamlets.

7.28 On balance it is considered that the private housing offer, while under-providing for larger units and over-providing studios, would constitute an acceptable mix of homes which would cater for a range of residents within the Borough at a variety of stages in their life. When considered against alongside the strong affordable housing officer provided within the scheme, as detailed below, it is considered that the scheme will provide for a variety of high-standard and diverse accommodation.

Affordable Housing

7.4 Tower Hamlets Local Plan Policy S.H1 sets an overall strategic target of 50% of affordable housing, with a minimum of 35% provision sought, subject to viability.

7.5 London Plan policy H4 (Delivering Affordable Housing) sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable, and highlights the need to meet the need for 43,000 affordable homes each year. Specific measures to achieve this aim include requiring major developments to provide affordable housing through the threshold approach and using grant to increase affordable housing delivery beyond the level that would otherwise be provided.

7.6 Tower Hamlets Local Plan Policy D.H2 sets the requirements of affordable housing provision within development in the borough, in terms of quantum, standard and provision. Development is required to maximise the provision of affordable housing with a 70% affordable rented and 30% intermediate tenure split (Para. 9.30 making clear that rented housing is expected to be 50% London Affordable Rent and 50% Tower Hamlets Living Rent). This policy highlights the

acute demand for affordable housing within the Borough, and the particular need for affordable family homes.

7.7 Tower Hamlets Local Plan Policy D.H3 requires development to provide affordable housing which is not externally distinguishable in quality from private housing.

7.8 The overall provision of affordable housing, as determined by habitable room, is detailed within Figure 8 with the unit mix and policy targets described within Figure 9 beneath.

	Habitable Rooms	Percentage split by tenure
Private	1,628	65%
Affordable Rent	623	35%
Shared Ownership	225	
Total	**2,506**	**100%**

Figure 8: Housing Tenures (by habitable room)

Fast Track

7.9 Policy H6 of the London Plan outlines the eligibility for schemes to utilise 'Fast Track' for the purpose of avoiding viability testing within the application. Given the strong affordable housing offer, it was agreed with the Council at pre-application stage that the scheme qualifies for Fast Track and therefore did not necessitate a viability testing route. Notwithstanding of this, an early-stage review as outlined in the below sections will still be secured within the S106 accompanying the consent.

Amount and tenure

7.10 As detailed below the affordable housing within the scheme constitutes 263 new homes in total, representing 35% overall by habitable room. The affordable housing is divided within the scheme at 70:30 in favour of social rented accommodation, and aligns with Council policy in this respect.

		Affordable Rent		Shared Ownership		
Unit Type	No. of Units	LBTH Policy Target	Proposed Mix	No. of Units	LBTH Policy Target	Proposed Mix
Studio	0	-	0%	0	-	0%
1 Bed	39	25%	23%	30	15%	33%
2 Bed	57	30%	33%	53	40%	58%
3 Bed	47	30%	27%	9	45%	10%
4 Bed	28	15%	16%	0		0%
Total	**171**	100%	100%	**92**	100%	100%

Figure 9: Affordable Housing Details

7.11 The social rented mix within the scheme is broadly policy compliant, with negligible differences across all unit types. While there is a minor under-provision of 3% within the 3-bedroom units, there is a small over-provision of 1% within the 4-bedroom units and brings the total family housing within the scheme to 43%, representing 75 new homes. The homes within this tenure will provide for a welcome and diverse offering in line with the policy objectives for D.DH2, and meeting the demands of those on the Borough's housing list.

7.12 The Shared Ownership (SO) housing falls short of meeting the Council's policy objectives within most tenures, with a higher provision within smaller units (1/2-bedrooms) and a notable shortfall of 30% within the larger family units. The shortfalls were discussed with LBTH Housing Officers during pre-application stage who recognised that SO larger units at present create challenges for affordability and scheme viability due to their relative high cost and

limited demand within this tenure. The overprovision within 1 and 2-bedrooms reflects the highest demand within this particular intermediate product and helps support the overall affordability of this intermediate product as well as assisting the delivery of a strong social rented offer through a more viable overall intermedia offering.

7.13 It is noted that other intermediate products were considered, such as London Living Rent, but Shared Ownership was considered most appropriate and viable for the scheme; allowing for a policy compliant offer overall and a strong proportion of socially rented family units. All intermediate products will remain secured within the S106 to be made available to persons below the upper limit of £90,000 shared incomes, providing for a well-blended overall affordable housing offer within the site.

Viability review

7.14 In line with relevant policy and guidance, to ensure that the maximum reasonable amount of affordable housing is delivered, it is recommended that s106 planning obligations secure an Early Stage Review. This would re-consider viability in the event that any planning permission is not implemented within two years from the date it is granted. Given the application was considered appropriate for Fast Track due to its policy compliant affordable housing offer, tenure and unit mix, a late-stage review is now required in line with the GLA's Affordable Housing and Viability SPG.

Affordability

7.15 As per the Council's policy objectives detailed above, the social rented housing will be secured within the S106 at 50% Tower Hamlets Living Rent and 50% London Affordable Rent. The proposed LAR homes would be let at rents that are capped at benchmark levels published annually by the GLA. The LAR rents for 2021/22 (exclusive of service charges) are 1-bed - £161.71, 2-bed - £171.20, 3-bed - £180.72 and 4-bed - £190.23. The Council would have first nomination rights to these homes.

7.16 The proposed SO homes would be with a minimum of 25% share on equity and a rental on unsold equity of between 0.5 and 2.75% and available to households with a maximum annual income of £90,000. In accordance with Mayoral and Council guidance, housing costs (a combination of mortgage, rent and service charge) must not exceed 40% of net household income.

Integration of different tenure types

7.17 The below Figure details the distribution of tenures throughout the development, highlighting the truly integrated nature of the homes within the scheme.

Figure 10: Tenure Distribution

7.18 As shown above, the affordable housing within the scheme is distributed through the three buildings comprising Plots 1 and 2 of the proposed scheme. One block of wholly social rented tenures comprises the primary gateway building to the site, and is conjoined with the primary school building as shown above in grey. The block provides a lower rise transition to Blackwall Way and the interface with John Smith Mews, and comprising the bulk of the family housing within the scheme.

7.19 Plot 1 is wholly tenure blind, and comprises the greatest quantum of development within the scheme. The lower floors of the western tower comprise the remaining balance of social rented tenure with the scheme, which is shared with the market sale units within the upper levels. Similarly, the eastern tower block within Plot 1 is divided between intermediate units at the lower ground and market tenure at the upper, with the intermediate units wrapping around the podium block, creating a central community space which is accessed by all tenures.

7.20 The remaining two riverside blocks are wholly market housing, with primary access to both blocks via the public square at the head of the Blackwall Yard Graving Dock which acts as a connector between all the buildings and tenures on site. These riverside blocks will maintain the same level of access to the community spaces within Plot 1 as other blocks, and as such will continue to contribute towards a wholly integrated community within Blackwall Yard.

7.21 LBTH Housing Officers noted within their consultation comments that while the integrated approach towards housing was supported, that the applicant would need to carefully consult with Registered Providers (RPs) to ensure that the management and service charges associated with the shared spaces would not breach any of the rental caps or create affordability issues for the social rented units in particular. The applicant has advised that they have engaged with a series of RPs to ensure the layouts would be acceptable, and that all service charge estimates remained within the budgeting of these RPs.

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7.22 London Plan Policy D3 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; is designed to incorporate safe and dignified emergency evacuation for all building users; and as a minimum at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.

7.23 London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (Regulation M4(3) (a) designed to be 'wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

7.24 The application provides for 90 Wheelchair Adaptable Units (WAU), representing just over 10% of all total apartments. The WAU are distributed across various buildings site wide in closest proximity to the wheelchair parking within Plot 1 (as per below figure), to provide equal distribution and across tenures and Plots. Indicative layouts for these flats are provided within the submitted Design and Access Statement, and the distribution within each plot is discussed further below.

Figure 11: M4(3) Housing Distribution

Plot 1

7.25 Given the mixed tenure of Plot 1, and the siting of the wheelchair accessible parking bays within the podium, the bulk of the wheelchair user dwellings will be located within the tower and podium of this plot. Indicative layouts are included within the Design and Access Statement which showcase the even distribution of these flats across the floors, as well as an access strategy for users, as detailed within the below Figure..

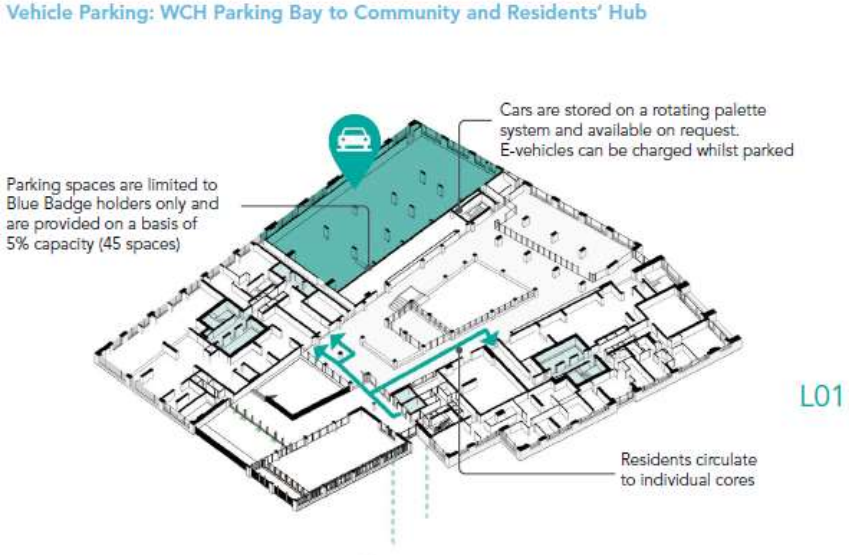


Figure 12: Accessible Bay Access Strategy

Plot 2

7.26 All homes within Plot 2, the wholly socially rented block, will be designed to achieve Regulation M4(2) in order to provide accessible homes in perpetuity. Site wide 10% of the new homes will achieve Regulation M4(3); however these will be concentred in buildings in closest proximity to Plot 1 where the accessible parking is located.

Plot 3 & 4

7.27 As highlighted in Figure 12 above, wheelchair homes are provided between levels 1-7 within Plot 4 and levels 1-3 within Plot 3. Indicative layouts for these homes are provided within the Design and Access Statement.

7.28 With respect to overall design of homes across the whole development, basic circulation provisions are required within homes, with corridors typically a minimum of 1050mm wide and turning space for a wheelchair within the living room and dining areas. All 1-bed homes are designed with open plan living/dining/kitchen spaces, whilst some 2-bed homes are provided with separate living rooms with shared kitchen/dining areas. Turning circles within the living and kitchen spaces meet the minimum requirements. All bedrooms are provided with the required manoeuvring space around the bed and have the required space to approach the window.

7.29 Hallways and doorways are suitably designed to enable movement for the widest range of people, inclusive of those using wheelchairs or mobility scooters or moving furniture. Individual home entrance doors are located either with straight on or right-angle approaches. All doorways within individual units are provided with minimum clear opening widths of 775mm with minimum 300mm nibs on leading edge.

7.30 To accommodate residents utilising wheelchairs, the positioning of all switches, controls and devices will be provided at a height of between 450mm – 1200mm above floor level at a minimum.

7.31 Further details of all wheelchair units, the location, and the layouts, will be conditioned upon consent.

Quality of Residential Accommodation

7.32 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This policy also requires the maximisation of dual aspect dwellings and the provision of sufficient daylight and sunlight to new dwellings.

7.33 Tower Hamlets Local Plan Policy D.H3 requires developments to meet the most up-to-date London Plan space standards and provide a minimum of 2.5m floor-to-ceiling heights.

7.34 Private amenity space requirements are determined by the predicted number of occupants of a dwelling. Local Plan Policy D.H3 sets out that a minimum of 5sqm is required for 1-2 person dwellings with an extra 1sqm provided for each additional occupant. In addition, London Plan Housing SPG reiterates the above standards and states that a maximum of eight dwellings per each core on each floor .

7.35 The proposed dwellings are of a notably high standard, with residential floor plates minimising as much as practical the number of units per core. While it is noted that Plot 1 podium blocks have a substantial number of units per core, this is unavoidable given their elongated nature however they remain broken up between two separate cores. The tower blocks of this Plot do not exceed 8-units per core, and reduce to 6 at upper levels. Plot 2 is a notably smaller in scale, and maintains no more than 4-units per core due to their large family sizes. Plot 3 maintains no more than 9-units per core, while Plot 4's dual core nature limits the numbers of units per core to no more than 7.

Housing Standards and Guidance

7.36 The proposed unit sizes meet the London Plan's minimum space standards. All units would have private amenity space provision that meets minimum standards, with the west facing units of Plot 4 in closest proximity to the Telehouse Data Centre to have enclosed solar gardens to maximise their daylight and sunlight, and amenity.

7.37 The housing on site has been designed to maximise wherever possible the percentage of dual aspect flats within the scheme. Notable constraints with respect to aspect ratios relate to the podium units of Plot 1 which particularly along the western elevation maintain a linear elevation along the site boundary facing the Telehouse site.

7.38 The design of the tower blocks within the same Plot were amended considerably through the pre-application process to minimize the number of single aspect north-facing units, which have been reduced to one per floor. Notably, these flats benefit from particularly generous amenity spaces to compensate for this single aspect profile.

7.39 The larger social rented homes within Plot 2 benefit from dual, or in some instances, triple aspect accompanied by generous private amenity space.

7.40 Plots 3 and 4 face similar constraints to the podium blocks of Plot 1 with respect to their long and rectilinear floorplates and layout. By virtue of this there are a number of single aspect east and west facing flats; however the number of these were reduced considerably through the pre-application process. Notwithstanding this, no flats suffer from a solely northern aspect and all flats within these developments benefit from excellent private and communal amenity access.

Noise & Vibration

7.41 The application is supported by a Noise Impact Assessment. This concludes that the proposed development would not have an unacceptable impact on nearby homes and that the proposed housing would have an acceptable noise environment. Noise was scoped into the Environment Statement, and the chapter was part of rigorous assessment by LBTH noise officers and Temple Group acting on behalf of the Council.

7.42 Within the scope of the ES, concerns were raised with respect to noise impacts as related to overheating mitigation. Officers held reservations that for occupants of flats requiring overheating mitigation by way of operable windows, that unacceptable noise conditions could be resultant.

7.43 Temple Group states that the Energy and Sustainability Statement submitted with this application includes, in its analysis of overheating risk, a consideration of noise levels which acknowledges that high noise levels will prevent the preferred overheating strategy (openable windows in early morning, late evening and throughout the night). The Energy and Sustainability Strategy states that mechanical cooling has been included to reduce the risk of noise disturbance due to open windows. This has been factored into energy calculations, although it is not clear from this report the extent of the requirement for mechanical cooling.

7.44 It is noted that these concerns remain within the application, notwithstanding the limited number of flats this may affect. As such a condition has been recommended securing acceptable noise levels during periods of overheating, supported by information from the Applicant identifying which units will exceed acceptable levels and require mechanical cooling.

7.45 LBTH Noise Officers separately recommend the inclusion of conditions relation to restrictions on demolition and construction activities, mechanical plant, and noise and vibration mitigation.

7.46 Subject to securing the above mitigation by way of planning conditions, officers agree that the proposed new homes would have an acceptable noise environment and that the proposed development does not cause unacceptable noise impacts on existing surrounding homes.

Air Quality

7.47 Tower Hamlets Local Plan Policy D.ES2 requires development to be at least 'Air Quality Neutral' and calls on air quality impacts to identify any necessary mitigation for developments that would cause harm to air quality.

7.48 Air Quality has been scoped into the scheme for the purpose of the EIA and is considered within the Air Quality Assessment (AQA) submitted. It is noted that a supplementary Air Quality Note was prepared on 22 June 2021 to respond to concerns raised by LBTH Officers and Temple Group, in their role as EIA reviewers.

7.49 The application site is constrained by a number of negative air quality receptors, notably due to its adjacency to Aspen Way. The scheme is located within an area of sub-standard air quality as defined within the Local Plan. The scheme itself has been defined as air quality neutral with respect to London and Local Plan policies. The removal of over 200 private car parking spaces on site has positively contributed towards this.

7.50 Concerns were raised throughout the assessment of the submitted ES with respect to the described baseline of the development, due to the way in which the baseline model was constructed by Buro Happold on behalf of the applicant. Reviewers and officers raised concerns that the use of monitoring stations in Millwall Park, and failure to use more local Defra background monitoring stations. Other concerns raised relating to pollutant concentrations associated with the Telehouse Data Centre backup generator, which tested monthly, produced unacceptable levels of emissions.

7.51 While initial requests were made for the applicant to use Defra background modelling, Temple Group and LBTH Officers accepted that these values were too high when compared against roadside monitoring stations within adjacent gridded squares.

7.52 To address these concerns, the applicant has undertaken an alternative modelling exercise in consultation with Temple Group and LBTH to create a more representative baseline. Using Defra background concentration projections for the adjacent grid square for the year of development opening (2025) indicates a background concentration of 25ug/m3, compared to the 24µg/m3 which was used in the air quality assessment. The use of this background concentration would therefore not change any of the conclusions of the assessment with regards to onsite conditions, and would lead to a maximum predicted onsite NO2 concentration of 38.8µg/m3, compared to the 37.8 presented in the ES chapter, both below the Air Quality Objective of 40µg/m3.

7.53 Temple Group and LBTH Officers have accepted the above model, and recognise the new baseline as satisfactory. With respect to site wide values, it is important to note that there are no exceedances across all receptors by the indicative point of opening, with the school and associated play areas remaining comfortable beneath 40µg/m3. The siting of the school was carefully considered in such a way to minimize pollutants associated with Aspen Way and vehicular traffic.

7.54 To address further concerns associated with the operation of the data centre generators, the applicant has agreed to a S106 obligation requiring the reconfiguration of these generator flues prior to occupation of the relevant residential units. These units will also serve to benefit from mechanical ventilation with odour and NOx filtration at western facades designed to enhance the air quality infiltrating into these properties – the details of which will be secured by condition. Additional mitigation measures are included through the conditioning of a detailed Construction and Environmental Management Plan (CEMP) which identifies and provides mitigation against construction phase air quality impacts due to dust.

Privacy & Outlook

7.55 The proposed buildings are located, and the proposed flats have been designed such that all proposed homes would have a good outlook, whilst safeguarding the privacy of people living in other proposed blocks and existing homes. Overlooking between Plot 3 and residents of Virginia Quay and Longitude House have been minimised as much as practical, with generous separation distances ensured throughout. Plot 1 and Plots 3 and 4 have been designed as such so that the internalised spaces between the buildings do not overlook each other, and

benefit from acceptable levels of physical separation. Acoustic privacy should be ensured by compliance with the Building Regulations.

Daylight, Sunlight & Overshadowing

7.56 The submitted Internal Daylight and Sunlight report assesses the internal daylight provision for the proposed homes in terms of Average Daylight Factor (ADF) and No Skyline (NSL) methodologies. It also assesses internal sunlight by way of the Annual Probable Sunlight Hours (APSH), and a Sun Hours on Ground (SHoG) assessment was undertaken to consider potential overshadowing of internal amenity spaces.

7.57 The assessment has been undertaken by GIA Chartered Surveyors, and through the preparation of a 3D model have tested 2,513 rooms within the development.

7.58 Full details per Plot are provided below, however in summary, for daylight the results of the ADF assessment show that of the 84% (2,101) of the rooms would achieve or exceed compliance with the prescribed BRE guidance while 88% (2,217) would achieve or exceed compliance with the prescribed BRE guidance with respect to NSL.

7.59 With respect to sunlight, 62% of living areas facing within 90 degrees due south would benefit from good levels of sunlight through the year, with 83% being well lit during winter months.

7.60 Overall, the proposed open spaces benefit from 67% of their areas seeing in excess of 2 hours sunlight on 21 March, ensuring the predominant provision of communal and public open spaces are well lit and offer high amenity value.

7.61 It is important to note that due to the site's orientation and the layout of the development, which is aimed at minimising the number of north-facing units, most living areas tested are predominantly southwest facing and so can only naturally receive direct sunlight in the afternoon, resulting in lower PSH values overall.

Plot 1

7.62 For daylight the results of the ADF assessment shows that of the 84% (1,638) of the rooms would achieve or exceed compliance with the prescribed BRE guidance, rising to 92% when including all LKDs, while 95% would achieve or exceed compliance with the prescribed BRE guidance for NSL.

7.63 For sunlight 62% of living areas facing within 90 degrees due south would benefit from good levels of sunlight through the year, with 83% being well lit during winter months.

Plot 2

7.64 For daylight the results of the ADF assessment shows that of the 89% (121) of the rooms would achieve or exceed compliance with the prescribed BRE guidance, rising to 91% when including all LKDs, while 73% would achieve or exceed compliance with the prescribed BRE guidance for NSL.

7.65 62% of living areas facing within 90 degrees due south would benefit from good levels of sunlight through the year, with 83% being well lit during winter months.

Plot 3

7.66 For daylight the results of the ADF assessment shows that of the 86% (195) of the rooms would achieve or exceed compliance with the prescribed BRE guidance, rising to 91% when including all LKDs, while 84% (191) would achieve or exceed compliance with the prescribed BRE guidance for NSL.

7.67 62% of living areas facing within 90 degrees due south would benefit from good levels of sunlight through the year, with 83% being well lit during winter months.

Plot 4

7.68 For daylight the results of the ADF assessment shows that of the 80% (410) of the rooms would achieve or exceed compliance with the prescribed BRE guidance, rising to 83% when including all LKDs, while 72% (369) would achieve or exceed compliance with the prescribed BRE guidance for NSL.

7.69 62% of living areas facing within 90 degrees due south would benefit from good levels of sunlight through the year, with 83% being well lit during winter months.

7.70 While overall strong compliance is adhere to, particularly within Plot 1, it is noted that Plot 4 suffers from notably poor daylight and sunlight levels within some lower level flats given its close adjacency to the Telehouse Data Centre to the west of the site. Many of these values would fail to meet BRE guidance with respect to both ADF and NSL values, and would suffer from poor daylight and sunlight until such a time as the Telehouse Data Centre were to be redeveloped.

7.71 In considering these impacts within Plot 4, it is important to consider the site constraints and the overall benefits of the scheme, the tenures affected and the proportionate amenity disbenefits suffered. Given the separation distance between the western dock edge and the Data Centre, some challenges with respect to daylight and sunlight are viewed as being unavoidable. The desire to have a generous setback from the Graving Dock while ensuring a reasonable quantum of development at this Plot has had to be balanced carefully in the consideration of the impacts.

7.72 It is important to note that through pre-application and submission the applicant has tried to mitigate these impacts as much as possible through the increasing separation at this boundary, as well as the limiting of overhanging balconies to lower habitable rooms which may further diminish their amenity. Finally, the introduction of 'solarium' balconies at these locations marginally improved the daylight and sunlight values benefited to these apartments.

7.73 The flats affected are wholly market sale tenure, which while not a specific mitigating factor in and of itself, ensures that any occupants who purchase these flats have a choice in their accommodation unlike those within social rented tenures or even intermediate products where affordability is a limiting factor.

7.74 Overall, while the failures within these lower level flats are regrettable and will reduce the amenity enjoyed by occupants, it is considered that on balance they represent a notably small proportion of units within the scheme and the overall public benefits provided through 898 new residential units, primary school, and sitewide enhancements outweighs the harm to these market units. It should also note that these units would continue to maintain access to communal and public spaces within the site, including generous communal riverside rooftop spaces within Plot 4 which benefit from unparalleled views and sunlight/daylight.

Wind/Microclimate

7.75 Policies D3, D8, and D9 of the London Plan require developments, particularly those with tall buildings, to be considerate of micro-climate impacts associated with their scale and mass. Local Plan Policy S.DH1 requires new buildings to be built to the highest standards of design, and ensure that there are no unacceptably harmful impacts arising from wind. Policy D.DH6 similarly requires all tall buildings to be designed in such a way to avoid wind-tunnelling effects.

7.76 Chapter 12 of the Environment Statement reports the findings of the wind and microclimate study. The assessment of the wind conditions requires a standard against which the measurements can be compared. This report uses the Lawson Comfort Criteria, which is the established criteria which seeks to define the reaction of an average pedestrian to the wind. If the measured wind conditions exceed the threshold for more than 5% of the time, then they are unacceptable for the stated pedestrian activity and the expectation is that there may be complaints of nuisance or people will not use the area for its intended purpose. The below Figure highlights the Lawson Comfort Criteria, and the suitability of associated activities:

Key	Comfort Category	Threshold	Description
	Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods
	Standing	4-6 m/s	Gentle breezes acceptable for main building entrances, pick-up/drop-off points and bus stops
	Strolling	6-8 m/s	Moderate breezes that would be appropriate for strolling along a city/town street, plaza or park
	Walking	8-10 m/s	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering
	Uncomfortable	> 10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended

Figure 13: Lawson Comfort Criteria

7.77 As described within the assessment, through the testing of a 1:300 model of the proposed development and through utilising a large number of receptors both on and off site, determines the impacts associated. The testing is undertaken at a number of scenarios including existing conditions which presents as a baseline, the proposed development, proposed including cumulative development, and proposed including landscaping and mitigation measures. The Figure below highlights the receptor impacts during the windiest season around the site. Notably, there are no 'uncomfortable' winds and only 4 receptors which register as only suitable for walking.

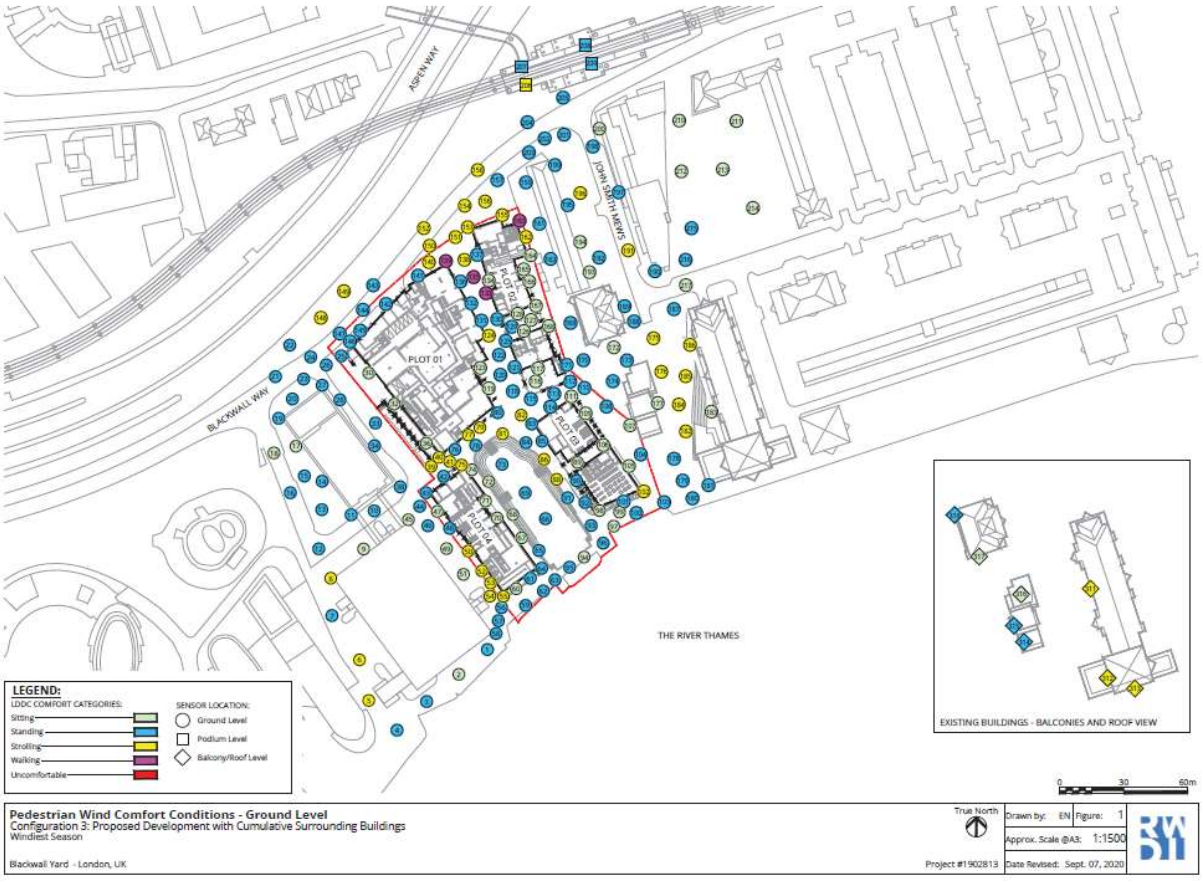


Figure 14: Ground Level Receptors (Windiest Season)

7.78 Overall it is considered that the development would not result in any unreasonable impacts with respect to wind-tunnelling within or outside of the development boundaries. Additional Mitigation measures have been identified within the ES review by Temple Group and will be secured by way of condition.

Fire Safety

7.79 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. London Plan Policy D5 (B5) states that new development should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The Mayor of London has also published pre-consultation draft London Plan Guidance on Fire Safety Policy D12(A).

7.80 A comprehensive Fire Strategy has been prepared by suitably qualified professionals at Buro Happold in support of the application. The strategy details how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Within the Mayor's Stage 1 response to the application, the comprehensive nature of the application is noted while requesting confirmation whether fire evacuation lifts will be provided as required by Policy D12.

7.81 Firefighting lifts are provided to all residential blocks. As noted in the fire strategy, it is proposed these remain operational in a fire scenario to allow them to be used as evacuation lifts (before they are required by the fire service, subject to suitable management). This is considered a reasonable approach for residential occupants to be able to suitably manage their evacuation independently. It is proposed that the occupant lift in the school should be an evacuation lift to be in line with the draft London Plan

7.82 While the submitted Fire Strategy remain comprehensive and well considered, it is recommended that a planning condition secures the submission and approval of a detailed statement before the commencement of development to ensure compliance with any final detailed design.

7.83 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

<u>Communal Amenity Space & Play Space</u>

7.84 London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10sqm per child.

7.85 Local Plan Policy D.H3 requires a minimum of 50 sqm of communal amenity space for the first 10 units and a further 1sqm for every additional unit thereafter, as well as the provision of appropriate child play space as determined by the child yield calculator.

7.86 The proposed development would provide the following play space, communal amenity space and publicly accessible open space. The development provides for 938sqm of communal amenity space overall, which meets the objectives of Policy D.H3. The breakdown of this space is detailed in the Figure below. It is noted that the overall quantum is provided in line with the policy; however it is not evenly distributed. The bulk of the amenity space within the development would be centred within Plot 1, the mixed tenure nature of which would ensure that it remain accessible for all residents of the development.

Typology	Scheme Requirement (sqm)	Scheme Provision (sqm)
Communal Amenity	Plot 1	768
	Plot 2	59
	Plot 3	57
	Plot 4	54
	938	938

Figure 15: Communal Amenity Space Distribution

7.87 The amount of proposed communal amenity space is noted to exactly meet the policy requirements. It is noted that a substantive amount of the high value amenity space on the site is intended as public or play space and as such is not included in the above figure. The development and its residents would benefit from considerable amenity spaces both internal and external.

7.88 The LBTH Child Yield Calculator estimates that a total of 358 children will likely eventually live in the proposed development. The below figure provides highlights the demand and playspace requirements (as determined by Policy D.H3 of the Local Plan) associated with these projected children across the three identified age groups, and how this is addressed within the scheme.

Age Group	Requirement	Provision
Under 5 years (Doorstep Play)	1,408	1,408
5-11 years (Local Play)	1,139	1,139
12-18 years (Neighbourhood Play)	1,074	594
All ages (incidental play)	-	331

Figure 16: Place Space Requirements

7.29 Overall there is a strong provision of playspace within the scheme which provides for a variety of users (as detailed in the Figure below). Notwithstanding this, as detailed in the above table there is a shortfall in the provision on site for children over-12. While the first principle of delivering play space should be for provision on site, it is noted that section 9.50 of Policy D.H3 notes that if due to site constraints it cannot be provided on site, then local play space needs to be identified in the immediate area which caters to the needs of the identified demographics for which there is a shortfall.

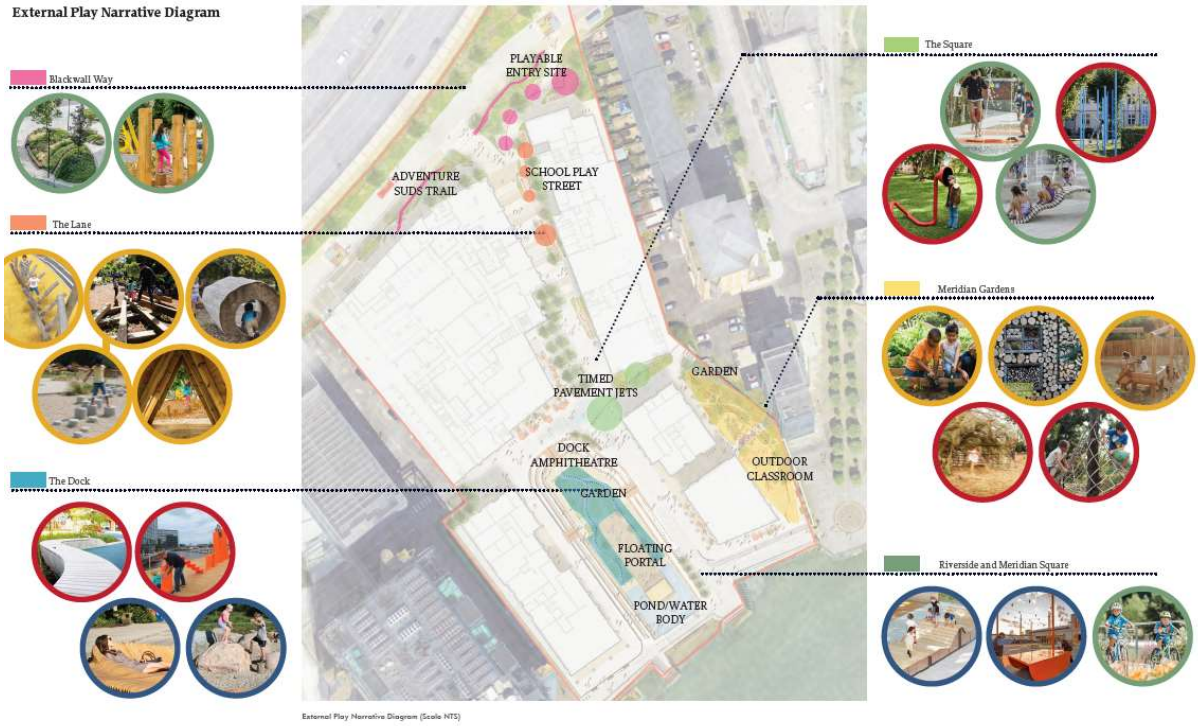


Figure 17: Proposed External Play Space

7.30 The GLA's Play and Recreation Supplementary Planning Guidance (2012) provides detailed guidance on the appropriate distances to local play spaces as well as guidance on the needs of the different age groups in terms of equipment and scale. As detailed in this guidance, for developments projected to accommodate between 30 – 49 children, facilities for 5 – 11s should be provided first on site; however as above if not able to be accommodate they should be located within 400m walking distance of the site. For over-12s it is expected that appropriate play space should be provided within 800m walking distance from the site.

7.31 The SPD provides details on the needs of different age groups, noting that 0 – 11 requires local playable space and neighbourhood playable space which includes landscaped open spaces, kickabout areas, and equipment integrated into the landscape. Youth space, for ages 12 and above, is detailed as catering towards higher intensity uses including multi-use games areas (MUGA), climbing walls, wheeled sports areas, outdoor stages and exercise equipment. As outlined within the SPD, it is challenging to accommodate over-12 provision on site due to the spatial requirements of assets such as MUGAs, the dimensions of which are standardised by Sport England.

7.32 As detailed in the play space strategy, there are a range of open spaces within walking distance of the application site which provide for a variety of character and uses. In catering for children aged 12 and above, the applicant has identified a range of open spaces which would accommodate the requirements of this age group within 800m walking distance of the site including multi-use games areas at Woolmore School, Millennium, Virginia Quay, and East India Dock Basin. It is considered that these spaces, in tandem with the already high level of provision of play space on site, provide a very strong provision of the appropriate typology of spaces for all children.

7.89 Further to the above, it is noted that the proposed 2FE primary school to be delivered on site will accommodate a Multi-Use Games Area (MUGA) which has been specifically designed to allow for external access after hours in the likely event the school operator allows or caters for access. This has been specifically designed to allow for it to meet the needs of the development, but due to the unknown operational requirements of the future school bidder – it cannot be relied upon to offset against the planning requirements of the scheme.

7.90 As such, notwithstanding a good overall offer on site, an off-site contribution of £100,000 (and a 5-year £7,650 per annum maintenance obligation (£38,250 in total) will be required to be secured within the S106 to allow LBTH Parks to deliver works commensurate with the

demands of the shortfall. This figure is based on projects of similar sizes catering for similar numbers of child within the Borough, and will assist in off-setting the demand generated.

Density

7.91 London Plan Policies D2 and D3 require optimising site capacity through a design-led approach, whilst taking account of existing and proposed infrastructure. Explanatory text to Tower Hamlets Local Plan Policy D.DH7 makes clear that proposed tall and dense developments are required to consider the criteria set out in Policy D.DH6. The Council's High-Density Living SPD (December 2020) provides guidance on designing for high density.

7.92 Taking account of the proposed non-residential uses, the proposed development would have a density of 472u/ha (1,318hr/ha). London Policy D4 requires that all proposals exceeding 30m high and 350 units per hectare must have undergone a local borough process of design scrutiny. The applicant has engaged extensively with officers and an emerging scheme for the site was considered by the Conservation and Design Advisory Panel (CADAP), which has informed the current scheme and design layout. The application scheme generally reflects guidance in the *High-Density Living SPD*, which was in draft at the time that the application was submitted. The London Plan (para. 9.4.9) requires applications for higher density developments (over 350u/ha) to provide details of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers).

7.93 These aspects of the development have been addressed and outlined in the submitted documents, or will be controlled by way of conditions and S106 obligations.

Design

7.94 Development Plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.

7.95 London Plan (2021) policy D3 promotes the design-led to optimise site capacity. The policy requires high density development to be in locations well connected to jobs, services, infrastructures and amenities, in accordance with London Plan (2021) D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.

7.96 Tower Hamlets Local Plan policy S.DH1 outlines the key elements of high-quality design so that the proposed development is sustainable, accessible, attractive, durable and well-integrated into their surroundings. Complementary to this strategic policy, Local Plan policy D.DH2 seeks to deliver an attractive, accessible, and well-designed network of streets and spaces across the borough.

Site Layout

Overall layout

7.97 The proposed site layout has been designed around creating a new inclusive community within Blackwall Yard, defined by four development plots containing a collection of buildings centred around a public plaza and heritage-led redevelopment of the Blackwall Yard Graving Dock which will be revitalised as a public open space. The primary access through the site will be by way of Blackwall Way, accessed through a space described as 'The Lane' which connects pedestrians with the heart of the urban realm at the Graving Dock. An illustrative site layout is shown in the below Figure.

Figure 18: Illustrative Site Layout

7.98 As illustrated above, the site composes of four development Plots, notionally referred to as Plots 1, 2, 3 and 4. These plots have been configured to respond to the constraints of the application site, notably the adjacencies to the Telehouse Data Centre, existing residential development at Virginia Quay and the Grade II Listed Blackwall Yard Graving Dock which encompasses a considerable amount of space centrally within the site existing to the River Thames.

7.99 All four plots accommodate new homes across varying levels of density, with Plot 1 providing for the greatest number of units across a 39 and 32 storey tower before transitioning towards the Thames at Plots 3 and 4 at 20 and 15 storeys respectively. Plot 2 is notably lower in scale and community in character with a 9-storey social rented block attached to the 5-storey primary school on site.

7.100 The layout is predicated upon crucial pedestrian movements leading from and to key infrastructure such as the East India DLR station to the north-east, and Virginia Quay to the east. North-south and east-west links through the site divide it into quarters, drawing pedestrians along the Thames Path and through the heart of the development centred around a revitalised and celebrated heritage asset at the Graving Dock.

7.101 The layout has also been devised to 'shield' the internal public and community focused spaces from negative noise and air quality receptors such as the DLR and Aspen Way, with Plot 1 in particular providing an acoustic barrier to safeguard the amenity of the new public open spaces and plazas within the development.

7.102 The layout and design of the application site have been developed through a robust, and proactive, engagement with Council officers over a 2-year period beginning in May 2019. The scheme has evolved considerably over this time, with LBTH Design Officers firmly supportive of the scheme, noting that:

The principles of good urban design are clearly present, with the site designed from the ground up. There is a clarity to the thought with a focus on spaces, movement and activity, placing people at the heart of the design thinking. This results in a logical and understandable site layout that seeks to maximise permeability, activity and life. This approach is fully supported by Place Shaping who welcome good design principles that respond positively to the features of the site itself and the surrounding context beyond the site boundary. The proposals clearly seek to enhance the positive qualities of the site whilst improving negative ones.

Architecture & Appearance

7.103 The scheme has been designed as part of a collaboration through three celebrated architecture firms responsible for various Plots and themes within the development. Glen Howells Architects (GHA) is responsible for the Plot 1 podium blocks and towers, Panter Hudspith for Plot 2 (including the school) and Community Hub within Plot 1, and White Arkitekter for Plots 3 and 4. In support of the principal architecture within the scheme, LDA Design are responsible for the comprehensive landscaping and urban design strategy for Blackwall Yard.

7.104 The architectural approach for the four plots are detailed below, with landscaping discussed in the following sections.

Plot 1

7.105 Plot 1 is defined by a series of key design components, and represents the largest scale of development within the scheme. The Plot is typified by 2 large tower blocks which dominate the skyline of the proposal, with a lower rise podium presenting a strong street elevation to Blackwall Way and defining the entry to the site. The below image highlights the relationship between the primary components of this Plot, as viewed from Blackwall Way.

Figure 19: Northern Elevation CGI (Plot 1)

7.106 Design by GHA, the plot is characterised between the juxtaposition of the two forms of the podium and tower blocks. The podium is defined by robust masonry benefitting from deep reveals and muted tones – echoing the maritime and industrial heritage of Blackwall Yard. The transition between this language and the tower blocks at the seventh story is stressed by way of a visual break imitating a 'shadow gap' between the forms. The contrast between the towers and podium is compelling and evocative, and creates to distinct forms which marry well when viewed across the various Plots.

7.107 The towers themselves, while being significant structures, maintain a lightweight appearance through their utilisation of an external metal frame which contrasts against the dark glazing and enclosed balconies across the towers. The design of the screen enclosing the towers is drawn from the historic 'keyed' sail of a Chinese junk-rigged ship which visited Blackwall Yard in 1848 to wide acclaim. This concept of drawing from the historic maritime character of the site has been emphatically supported by Borough Conservation and Design Officers, and was developed throughout the pre-application process considerably.

7.108 The tower screens fulfil dual functions of environmental shading, limiting the need for mechanical ventilation of flats and reducing the overall carbon load of these blocks – while also providing for a dynamic façade which changes when light hits the subtly twisted fins which comprise the primary eastern and western elevations (as detailed in the below figure).

Figure 20: Tower Facade Details

7.109 Inset into Plot 1 is the Community Hub which provides a distinctly more pedestrian scale in character and a markedly different appearance as highlighted below. The piece of community focused architecture, as designed by Panter Hudspith, presents as the cornerstone to the public plaza introduced centrally within the scheme at the head of the dock and co-located with the school to create a community zone within the scheme. The contrast in architecture provides a strong distinction in use between this building and the balance of Plot 1 and is strongly supported by Council officers. The transition from the robust masonry finish of the podium to the harder edge contemporary architecture of the Hub which is carried across to the primary school provides a link between to the past, while deftly scaling down from the tall elements within the Plot.

Figure 21: 'The Hub' CGI, as viewed from Dock

Plot 2

7.110 Plot 2 is characterised by the 9-storey residential block to its northern edge, and the lower slung profile of the 5-storey school extending along the perimeter of the site. While conjoined as a pair of buildings, the two components contrast against each other in a compatible fashion to define their use and transition from a grounded masonry building at the entrance of the site to the civic nexus at its core in conjunction with the Community Hub of Plot 1.

Figure 22: Plot 2 Residential

Figure 23: Plot 2 Western Elevation

7.111 The 9-storey residential block of Plot 2 accommodates wholly social rented tenures above some scale retail units which activate the ground floor and entry to the application site. The overall height and massing of Plot 2 has taken into consideration its close proximity to the adjacent residential homes to the east of the Site, specifically endeavouring to minimise any adverse effects by way of transitioning from the 7-storey podium and 32-storey tower to its west down to the 3-storey mews terraces of John Smith Mews to the east.

7.112 With respect to architectural expression, Plot 2 provides a more familiar residential scale and feel with a traditional robust masonry language comprised of muted red and grey bricks and GRC panels forming a clear vertical and horizontal hierarchy. The grounding of this building provides for a strong entrance to the Blackwall Yard development in parallel with that of Plot 1, with the separation space between these blocks creating 'The Lane' character area.

7.113 Transitioning to the south is the 2FE primary school, which provides a complementary architectural language but one which is distinctively different to that of the residential block. The school benefits from a façade structure which expresses a vertical emphasis by way of an expressed GRC grid against the inset glazing behind. The school terminates at the southern edge by way of the 'pavilion' block which benefits from double height spaces which are expressed externally. These spaces will be internally lit and illuminate the plaza space adjacent in the evenings, with the material palette and composition to echo that of the Community Hub adjacent.

7.114 The design of the school, both internal and external, has evolved over an extension pre-application process with the applicant, Panter Hudspith, LBTH Education and their design advisors. The primary focus has always been on functionality, privacy where necessary, and safety with respect to child drop off and accessibility. The Lane, where the school entrance remains recessed from the public highway, is dotted with incidental play spaces and

landscaping – providing a buffer to the secure access to the school which remains recessed behind the grounded GRC façade.

7.115 The school as proposed represents an excellent expression of pedagogical led design, which marries well with the remaining blocks of Blackwall Yard in both its contrast of use and architectural language.

Plots 3 & 4

7.116 Plots 3 and 4 represent standalone tower blocks, which unlike Plots 1 and 2 don't have associated community and civic functions. As such their architectural approach is notably different to that of the northern blocks and seek to response as much as possible to the significant frontages to the River Thames and the Blackwall Yard Graving Dock. Both blocks seek to echo the industrial heritage of the site through the materials and forms utilised, and are composed of distinct base, shoulder, and top elements. Plots 3 and 4, as designed by White Arkitekter respond to each other while remaining distinctly different buildings of differing character and scale.

Figure 24: Plots 3 & 4 (Southern Aspect CGI)

7.117 While Plot 3 stands as a single tower block above its podium base, Plot 4 is split with a taller riverside block rising to 20-storeys with a smaller 15-storey element physically separated and standing alone above the shared podium base. The architectural expression between these two towers present as distinct forms, with the smaller tower reflecting Plot 3 in materiality and balcony design. As detailed in the below Figure, the northern tower block grounds itself at the residential entrances, with the lower north-eastern edge of Plot 4 extruding outwards and forming a cornerstone to the building and reflecting the materiality, colour tones and design language of the southern riverside tower of the same plot. The design of these blocks allow for two distinctive forms to integrate, and create a clear residential entrance while applying the consistent podium approach between Plot 3 and 4 around the base of these buildings.

Figure 25: Plot 4 (Split Towers)

7.118 Both buildings have a clear base formed of concrete columns and beams. The two storey plinth houses the building entrances and immediate interface to their surrounds. The base to both Plot 3 and 4 draws the grid structure composing the predominant language of the buildings to the ground in a fashion reminiscent of historic warehouses which characterised the site. The materials employed are more commercial in scale and nature, providing double height spaces to the entrances, and commercial unit of Plot 3. Within this Plot the glazed facade is set back from the columns to form a colonnade which provides a sheltered entrance to the block as well as shelter for the pub/restaurant.

7.119 The mid-section is the most direct expression of the warehouse form which drives the inspiration for these buildings, constructed from robust brickwork with brick and metal balconies. The brick tones and detailing across both Plots 3 and 4 are similar to provide consistency around the Dock edge, and ensure that at ground and mid-level the buildings read as a pair when viewed from the dock edges. The mid-sections of the buildings are both defined by a visual break or 'shadow gap', as similarly employed on Plot 1 in its transition between podium and tower. The shoulder height provides a lower sense of scale around the dock edge.

7.120 The introduction of a mid-level shoulder and break in the volumes offers provides the ability for the buildings to contrast between the main volumes within the blocks. On Plot 3 this contrast is provided by a change in brick and metalwork colour whilst retaining the overall building rhythm and aesthetic. In the taller Plot 4 the upper 10 floors are conceived as a more expressive volume in response to its prominent riverfront location.

7.121 At a ground level, both of these Plots play a significant role in activating the space around the Dock which will accommodate a new piece of public open space and activated urban realm. Plot 3 will provide for the greatest level of activation through the introduction of a approx. 665sqm riverside public house at the southern edge of the base of the building. The architecture at this location reflects the internal commercial use with a double height recessed colonnade grid with stepped access from the river providing an immediate entrance to the site from Meridian Square adjacent (as shown in the below Figure). At this same block a small commercial unit wraps around the north and western ground floors to activate the public square and northern extent of the dock.

Figure 26: View from Meridian Square (CGI)

7.122 Plot 4 maintains a more residential character at ground floor, with residential amenities including wellness centre, meeting rooms and residential entrances sleeving the eastern façade facing the dockside. Despite these more residential uses at ground floor, the architecture seeks to reflect in part the same language as Plot 3 with tall height and half or double height spaces at ground with an extruded grid grounding itself – with the exception of the residential entrances which are of a materially different character. The consistency in this approach allows for a uniformed understanding of the ground floors to both Plots.

7.123 Townscape, Massing and Heights

7.124 London Plan Policy D9 provides a strategic guidance for tall buildings in the London area. The policy also sets out criteria which against which development proposals should be assessed and these include visual, functional and environmental impacts.

7.125 Tower Hamlets Local Plan policy D.DH6 seeks to guide and manage the location, scale and development of tall buildings in the borough. The policy identifies five tall buildings clusters in the borough and sets out principles of each of them.

Siting & Heights

7.126 The application proposes a series of buildings of varying heights across all four Plots described in the above sections. The building heights and their respective siting within Blackwall Yard are reflective of attempts to minimize harm to adjacent sensitive receptors, as well as to accord with the Council's Tall Building Policy D.DH6 which is described in greater detail below. In summary, the heights of the site are as follows:

- Plot 1: Two tower blocks of 39 and 34-storeys above a 7-storey podium
- Plot 2: 9-storey residential block joined to a 5-storey 2FE primary school
- Plot 3: 15-storey tower block above a 6-storey (including double height ground) podium
- Plot 4: 20-storey riverside tower and separated 16-storey northern tower

Tall building assessment

7.127 London Plan Policy D9 states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other

requirements of the Plan. It also requires proposals for tall buildings to address their visual, functional, environmental and cumulative impacts.

7.128 Tower Hamlets Local Plan Policy D.DH6 directs tall buildings to designated Tall Building Zones (Aldgate, Canary Wharf, Millwall Inner Dock, Blackwall and Leamouth). The application site falls within the Blackwall Tall Building Zone (TBZ) (as per the map below), the significance of which is described in the following section.

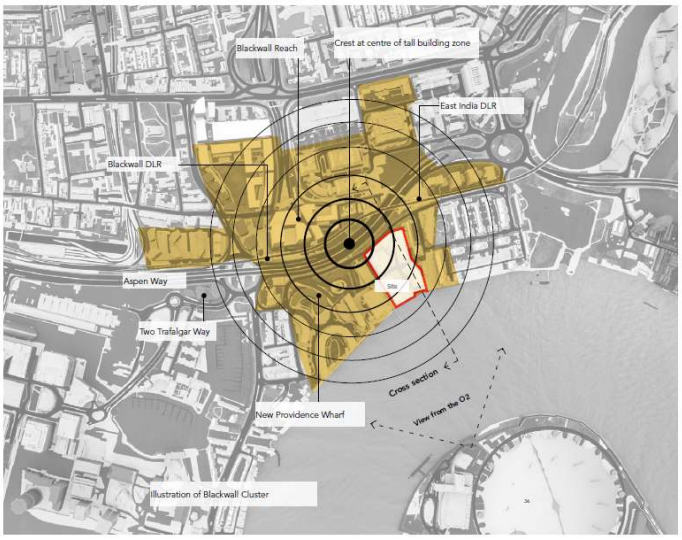


Figure 27: Analysis of the Blackwall Cluster

7.129 The general criteria set out in Part 1 to this policy requires that all tall building proposals must meet specific criteria which can be summarised as follows: have a proportionate scale, be of exceptional architectural quality, enhance character of the area, provide a positive skyline, not prejudice development potential, ensure a high quality ground floor experience, demonstrate public safety requirements, present a human scale to the street, provide high quality private communal open space/play space, avoid adverse microclimate impacts, ensure no adverse impacts on biodiversity/open space, comply with civil aviation requirements and not have unacceptable impact on telecommunications.

7.130 The proposal would introduce a prominent visual addition to the local townscape with particular regard to the two large tower blocks, and associated smaller tall buildings. The Townscape Heritage Visual Impact Assessment (THVIA) that forms part of the ES is based on verified views that were agreed with officers and additional views (not verified) that were tested during the design development process. All views presented within the THVIA are shown in the below Figure.

Figure 28: THVIA Viewpoints

7.131 In understanding the appropriateness of the siting and principal of a tall building, it must be considered where within any designated cluster the site and proposed buildings reside, with regards to the Tall Buildings Study which underpins the relevant policy within the Local Plan. Within this Study it is noted that the centre of the Blackwall TBZ lies between the Blackwall and East India DLR stations, roughly to the north side of Aspen Way and correlating with the Blackwall Reach Outline Masterplan, consented in 2012 and under construction.

7.132 The principles for the Blackwall Tall Building Zone, as described within Policy D.DH6 of the Local Plan are as follows:

- Development heights should step down towards the edge of this cluster.
- The cluster must be subservient to and separate from the nearby Canary Wharf cluster and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich peninsula.

7.133 As noted within the Tall Building Study, no development within the Blackwall Cluster should extend higher than the adjacent Providence Tower at New Providence Wharf, which is approximately 42-storeys in height. This will ensure that any height within Blackwall remains subordinate to the primacy of Canary Wharf are the tallest cluster of buildings within the Borough.

7.134 The surrounding area to the west of the site is typified by Charrington and Providence towers, which form part of the high density New Providence Wharf development. To the north and east of the site are the tallest point of Blackwall Reach which, as consented, reach approx. 37-storeys, as well as the Elektron development adjacent East India DLR which reach 84m AOD. Immediately adjacent are the Telehouse data centre and ancillary buildings which are 63m AOD in height at their tallest points.

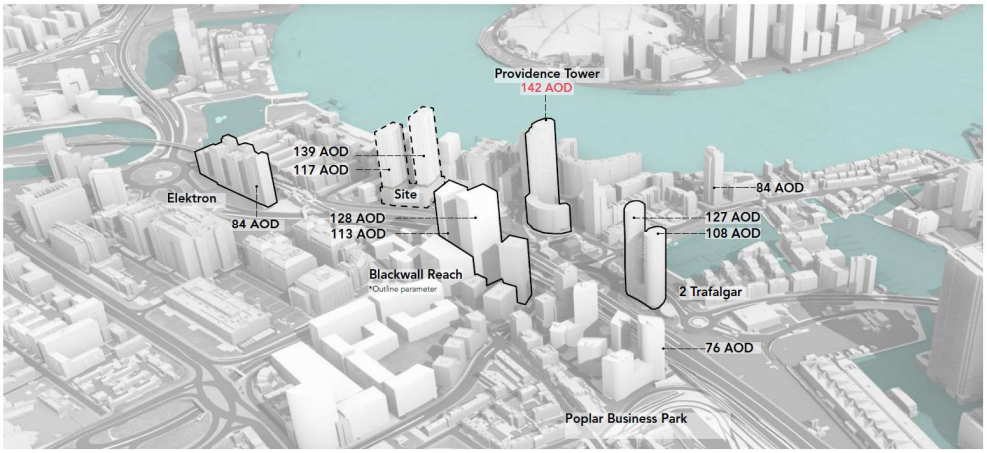


Figure 29: Local Tall Buildings

7.135 The proposed towers at 39 and 34-storeys within Blackwall introduce significant height locally, and would constitute key contributions to the Blackwall Cluster. Given the requirement for the tallest elements within a TBZ to be clustered centrally, the siting of these towers within the north-west corner of the site closest to this centre is a conscious decision It also serves to ensure that the most sensitive receptors at Virginia Quay are protected from amenity disbenefits associated with daylight/sunlight and wind.

7.136 The development naturally steps down from this location towards the Thames, in keeping with the ambitions of the Blackwall character area within the Tall Building Study and the ambitions of Policy D.DH6. The cascade in height south from the towers towards the river is characterised most notably by the part 20 and part 14-storey buildings within Plot 4. These tower blocks are the tallest components on site outside of the primary towers within Plot 1, and have been carefully designed again to minimize amenity impacts on sensitive receptors at Virginia Quay to the east.

7.137 Plot 2, comprising the 9-storey residential blocks and lower 5-storey school, provides the most sensitive interface to Virginia Quay where it transitions to the 3-storey terrace of John Smith Mews. This is notably the most sensitive point of interaction between the two developments, with a lower transition considered essential to minimize visual and amenity harm to residents.

Plot 3 is the final development plot on site, with a tower block of 15-storeys immediately adjacent to the existing 12-storey Longitude House to the east, within the extents of Virginia Quay.

7.138 The distribution of height within the scheme is well-considered, and designed in such a way to minimise harm to neighbouring developments while allowing for a pair of tower blocks to be included in the most appropriate way possible with respect to the policy and good design principles. The distribution of height also serves to transition from the centre of the cluster towards the river, according with the key criteria of the cluster. The distribution of the height west-east towards Virginia Quay is considered a reasonable response and limits as much as possible amenity disbenefits and creates a strong townscape transition, as detailed in the below Figure.

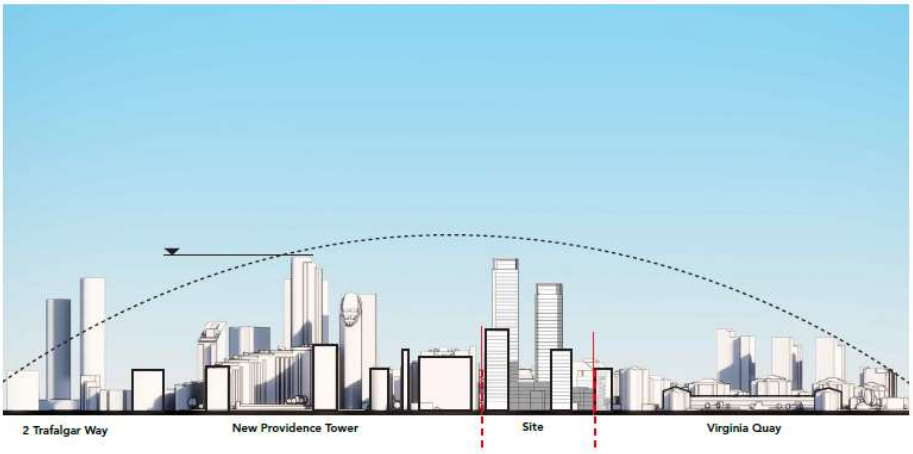


Figure 30: East-West Riverside Height Profile

7.139 The long range views of the site are dominated by the tower pair of Plot 1, which are visible in a range of views including designated strategic views such as London View Management Framework (LVMF) View 5A.1 (Greenwich Park) and from the Thames Barrier panorama view, both southern aspect long range locations. These views are highlighted below in a wireline format, and highlight the subordinate nature of the tallest points in relation to Providence Tower and the Canary Wharf Tall Building Zone as required by Council policy.

Figure 31: LVMF View 5A.1 (Greenwich Park)

Figure 32: Panorama view from the Thames Barrier

7.140 In considering the full range of views within the submitted THVIA, it is notable that the scheme integrates comfortable with the surrounding area and makes a positive contribution with respect to townscape by way of its considered massing and outstanding architecture. The contribution which the development makes to the skyline is considered a positive one, continuing a collection of riverside tall buildings that spans from Canary Wharf to Blackwall in a sensitive and considered way.

7.141 At a ground floor level, the pedestrian experience remains key to creating successful tall buildings on site with all the tower blocks within Blackwall Yard carefully designed to transition to a human scale and integrate with the public realm in a meaningful and positive way. The tallest parts of the site are set in to a podium block within Plot 1 which creates a carefully curated experience for residents and the community. Similarly Plots 3 and 4 transition and break their massing down to provide visual interest and lower scale to pedestrian focused areas such as the dockside or Thames Path.

7.142 Due to their alignment and distance from the site, only Langdon Park within the Designated Borough Views would be affected by the proposed tall building, and this impact is considered notably minor. The provision of communal open space and play space, potential adverse impacts on microclimate and biodiversity and fire safety considerations are addressed elsewhere in this report. They are all considered to be acceptable.

7.143 The townscape impacts as they relate to heritage assets are considered in the heritage section of this report.

Conclusion

7.144 The proposed Tall Buildings on site accord with the ambitions and criteria of the Council's Tall Building Policy D.DH6 through their well considered distribution of massing through the site, as well as their outstanding architectural quality and attention to pedestrian and human scale.

Access

7.145 London Plan Policy D8 requires development proposals to ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, and easy to understand and maintain.

7.146 The scheme has been designed around key access principles at a site-wide and building specific level. The primary access to the site is proposed to be via the north-east corner of the site closest to East India Dock DLR Station, between Plots 1 and 2. The entry to the site is denoted by the grounding of the Plot 2 residential block and podium of Plot 1, both sleeved with activated frontages and engaging landscaped public realm. Pedestrians are then drawn through the site to the new public plaza which is located at the head of the revitalised Blackwall Yard Graving Dock, before circulating through the site more widely.

7.147 Members of the public will greatly benefit from the opening up of the site, which will further extend the Thames Path at the eastern extent of the site with a long term ambition to open the entirety of the site to the public through adjacent developments. Legibility and wayfinding remain key parts of the scheme, and will enhance an area which suffers from limited pedestrian legibility to the riverside.

7.148 Residents access their homes via the four development plots, with residential entrances for Plot 2 at the immediate entrance to the application site while Plot 1 centralises access for all residents, regardless of tenure, through the south-eastern corner of the podium. The access at this location allows for the movements of both residents and pedestrians through The Hub space, before reaching secure gates for residents leading into the internal and podium-top amenity spaces.

7.149 The entrances of Plot 3 and 4 spill onto the dockside, with residential lobbies forming part of the ground floor before allowing secure access to the residential upper floors. Residents of both plots access their respective communal amenity space through the upper floors

Landscaping & Public Realm

7.150 London Plan Policy D8 requires development proposals to ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, and easy to understand and maintain.

7.151 Tower Hamlets Local Plan policy D.DH2 requires developments to positively contribute to the public realm through the provision of active frontages and multi-usable spaces that can cater for social gathering and recreational uses.

Landscape Strategy

7.152 The overall masterplanned approach for the scheme is underpinned by a comprehensive landscape strategy which knits together the various development plots through a series of 'Character Areas' as prepared by LDA Design. The characters areas, as detailed in the Figure below comprise of Blackwall Way, The Lane, The Square, Meridian Gardens, Riverside and Meridian Square and The Dock in addition to the communal areas and roof terraces.

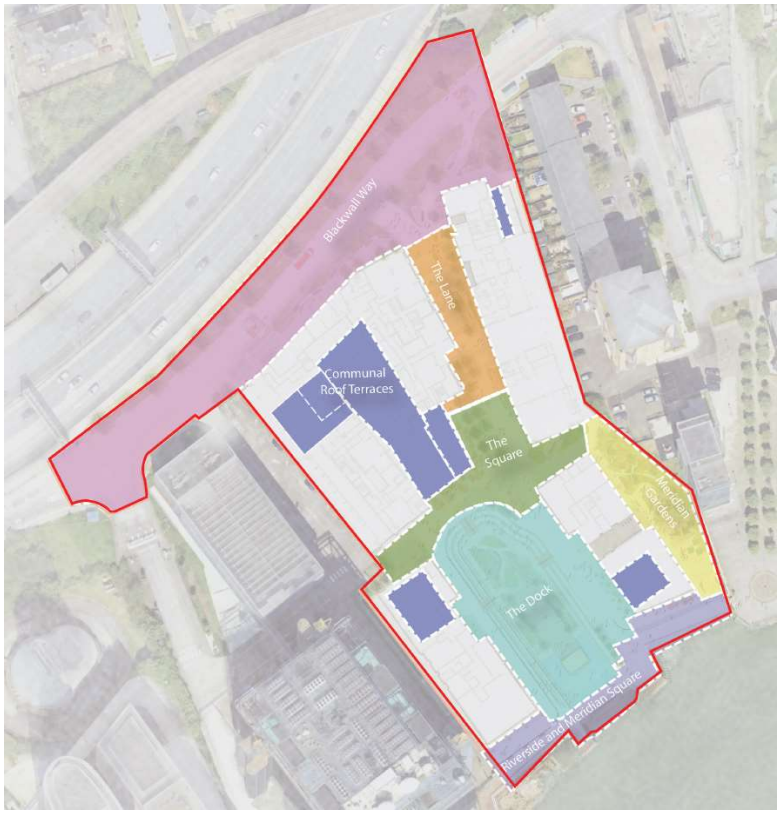


Figure 33: Landscape Character Areas

The Lane

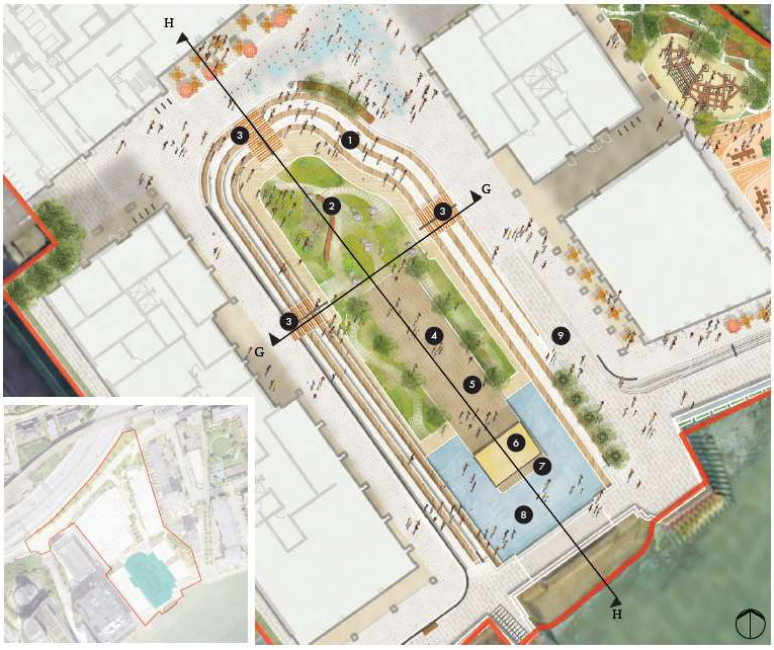
7.153 The Lane is the parallel space between Plots 1 and 2 which provides primary entry into the site, and terminates at The Square character area. The Lane is a tapered entrance to the site which narrows at its southern end as it funnels pedestrians and residents into the site.

7.154 The Lane has been designed to create a welcoming entrance to the Site, with enclosing buildings, flanking buildings designed to funnel the land to create a sense of suspense and surprise when arriving to the square and dock, providing the main north south thoroughfare between the Thames and the DLR station. Play and seating have been integrated into the design to activate the Lane, encourage community interaction and to provide playful landscapes for children to enjoy.

7.155 Paving materials and banding delineate building entrances and have been selected for their suitability for vehicular overrun for emergency and E.A vehicular access. The ground floor usage has been designed to provide active frontages to the length of The Lane, including shops, cycle workshop and the school and nursery entrance to create a bustling street, retail opportunities, as well as increase passive surveillance.

7.156 Shade tolerant planting and trees will soften the public realm, provide a defensible edge to the school, capture and infiltrate surface runoff, and assist with wind mitigation.

The Dock



7.157 The Dock is at the heart of the overall scheme and public realm strategy, proposing an exciting open central space that has a vital connection to both its historic past and its future role as part of the wider waterfront. It is proposed to in-fill the void of the Dock making it publicly accessible for all to enjoy, to create a destination, and to promote outdoor events and activities. The full scope of works, and their heritage impacts, are discussed in the below heritage section of the report.

7.158 The Grade II heritage listed dock has been fully retained and sensitively enhanced through the provision of intermediate bleacher style steps between the existing terraces to make for a more accessible open dock basin. Within the basin lies a garden offering natural play opportunities, flood attenuation, and planted with a species rich mix for increased biodiversity, and to prevent erosion. Additional tree planting has also been included for wind mitigation. As previously noted, listed building consent is sought for these works alongside the wider application for planning permission.

7.159 Towards the river a proposed pond/water body (which could potentially be used for swimming) has been created with a floating platform transitioning from the garden to the pond/water body, offering a flexible space to lie out on, jump off of, host events, etc. At the southern end of the

deck a sculptural installation in the form of a Portal serves to connect the dock with the river and pay homage to the sites ship building past.

7.160 Along the western dock edge there is a 4m offset at +6.2m AOD in accordance with the EA's access requirements, requiring balustrading around Plot 4. Along the eastern dock edge the restaurant sits up at +6.2m and 8 meters from the docks edge, forming the main thoroughfare from Blackwall Way to the river, with sloped access all ability access and emergency/ EA vehicular access.

Meridian Gardens

7.161 To the southeast of the Site adjacent to the Meridian line and Meridian Square, lies a dedicated publicly accessible play area providing an adventurous wild playground suitable for 0 to 11 year olds. This south facing area is strategically located to entice users of the Thames Path into the scheme encouraging better use of the public realm. Adjacent to the river fronting restaurant and just south of the school will also provide an exciting external space for children to enjoy.

7.162 The gardens have been designed to provide a number of trails for children to explore, discovering pockets of activities that spill out into the existing Meridian square and Thames Path, as well as foraging from fruiting trees and plants, with interpretative signage providing opportunity to learn about their environment. A large climbing frame is located at the heart of the gardens providing a more challenging structure to hang off of, climb, balance, jump from, that is suitable for more active and older age groups.

7.163 Towards the riverfront the playground opens out into a series of rubber mounds enclosing more passive activities. A kitchen garden with raised vegetable beds, tables and seating offer educational activities, to teach children how to grow food and care for their environment.

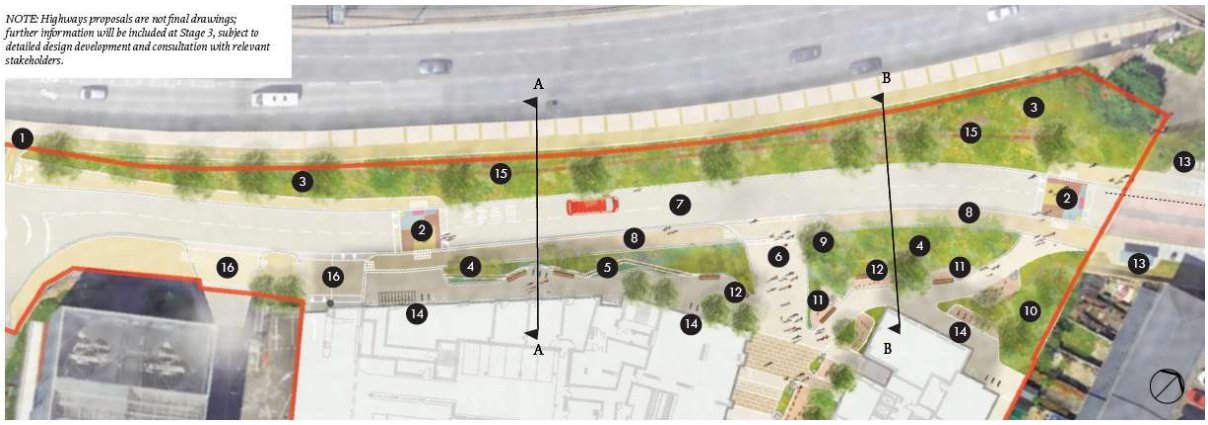
The Square

7.164 The Square is located at the base of the Lane, before opening out affording views across the historic dock, down towards the river, and across to Plots 3 and 4. Sitting at the heart of the Site, directly outside the school and Community & Resident's Hub it provides a generous bright welcoming space for people to gather, meet and greet.

7.165 The Square offers a flexible hard space accommodating opportunities for a sequence of programmed events, pop-up facilities for the new and surrounding community, and allows for any future east west connections. The materiality and design aims to reflect the open character of the historic dock. The copse of trees provides dappled shade and seating areas below. Short stay cycle stands, Brompton bike lockers, a bicycle repair station and drinking water fountain are all located conveniently within this area.

7.166 South facing cafe spill-out space activates the northern boundary of the dock and east of the square, overlooking the dock and in-ground programmable water jets animate the square. The water feature offers a valuable incidental play feature and can be turned on an off as required. Uplighting within the jets creates an ambient atmosphere at night.

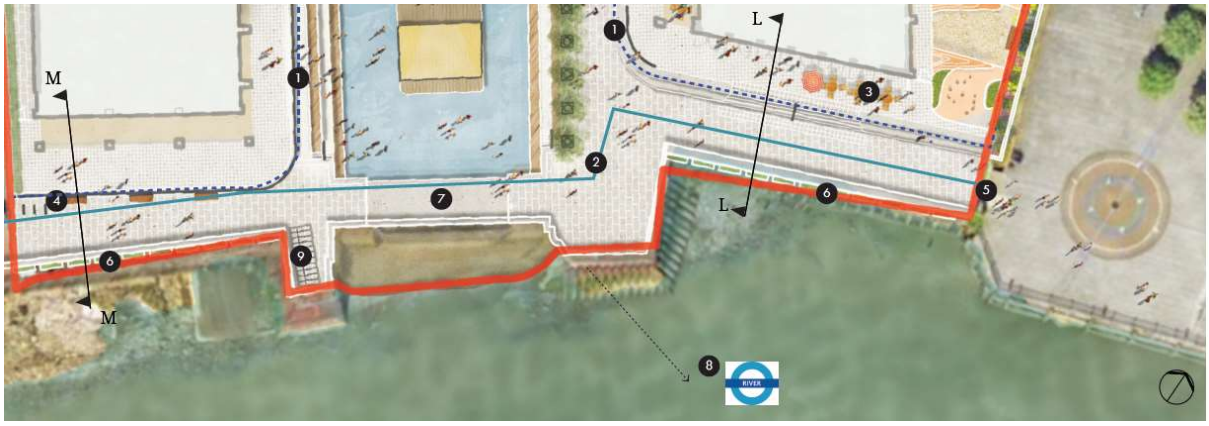
Blackwall Way



7.167 Blackwall Way has undergone extensive coordination and consultation with TfL & LBTH Highways Officers to enhance the quality of the finished surfaces and optimise the layout to create a welcoming safe entrance to the Site, whilst promoting sustainable forms of transport. Existing car-parking along the street will be removed, to create a more pedestrian focused space in close proximity to the new primary school.

7.168 Vehicular access is via Blackwall Way into the service yard in Plot 1, after which there will be bus and emergency access only, creating a cycle and pedestrian priority landscape. Active street frontages and improved streetscapes for users with well-lit and overlooked spaces enhances site safety.

Riverside & Meridian Square



7.169 The river walk has been closed for over 30 years. This scheme will see the last gate and wall along this stretch finally removed. The proposal will create a newly landscaped continuous river walk along the north bank of the Thames, whilst providing 2100 flood protection. The proposal aims to activate the river walk with a restaurant and spill out space onto the river front, as found at Battersea Power Station, providing places to meet, rest and overlook the Thames to the O2 arena.

7.170 The proposals have maintained the existing river wall, and tied into the adjacent sites, whilst maintaining a 4m clear route for EA maintenance access. Meridian square will now interface with a new public realm and river walk increasing its size and sense of openness. It is believed that these changes will make the square a more desirable place and allow it to be used as it was intended. Furthermore the proposed public house will draw people to the location.

Summary

7.1 Officers support the proposed landscaping and consider it to be well-designed and a significant public benefit within the scheme. The landscaping successfully pieces together the various architecture within the scheme and creates connections and variety within the public realm into the wider Blackwall community. It is recommended that details of the landscaping management are secured by planning condition to ensure a high quality of landscape design and maintenance.

<u>Safety & Security</u>

7.2 The site at present is a wholly

- Communal access control – the blocks will be compartmented with the main entry door having audio/visual access control.
- Lifts – access controlled with a secondary call point up to the flats, and destination controlled to the residents' floor and communal amenity floors only.
- Where compartmentation is not possible – communal access / egress doors are fitted with a secondary access / egress door of the same Secured by Design standard controlled by the legitimate user.
- Integrated systems will be utilized to link fire and security systems with a default that all security doors open in the event of a fire within the block.
- ACB / Fire Access – use of an Access Control Box is in addition to the installation of a Premises Information Box (PIB), which are recommended by the fire and rescue service and are referenced within clauses of BS 9991:2015. The exact location of an ACB will be specified following consultation with local fire and rescue services.
- Doors – will be self-closing and self-locking slam-shut BS8621 lock with access control unless using magnetic locks. When using magnetic locks there will be two per door with a minimum of 1200lbs (500kg) each lock set a third from the top and a third from the bottom of the door for maximum benefit.
- Mailboxes, windows, doors to be certified in accordance to the requirement.
- Alarm Systems / CCTV – CCTV will be installed in the entrance foyer, cycle stores, top of stairwells, covering all areas of car parking and an additional camera covering the access control panel at the entrance to the block.

- Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office will be of good facial recognition and colour quality in both daylight and night vision.
- CCTV will be securely stored i.e. on a remote cloud system, or on locked and secured hard drive.
- Appropriate signage will also be included highlighting its use

7.3 The Metropolitan DOCO raises no objection to the proposal but have recommended that a planning condition requiring a commitment to meet Secure by Design standards to the satisfaction of the LPA and Met Police. While it is noted that the applicant believe the appropriate levels of safe and security have been provided for within the submitted material, officers recommend the inclusion of a Secure by Design condition to ensure the highest level of safety compliance.

Heritage

7.4 Statutory tests for the assessment of planning applications affecting listed buildings and conservation areas are found in Sections 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990. Section 66(1) relates to applications that affect a listed building or its setting. It requires the decision maker to: "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". Section 72(1) relates to applications affecting a conservation area. It states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". There is a presumption that development should preserve or enhance the character or appearance of conservation areas.

7.5 Where a decision maker considers there is harm, the NPPF requires decision makers to distinguish between 'Substantial' or 'Less than substantial' harm. If a proposal would lead to substantial harm to or total loss of significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm (paragraph 195). Where a development would 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 (paragraph 196).

7.6 London Plan Policy HC1 and Tower Hamlets Local Plan Policy S.DH3 require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.

7.7 London Plan policy HC4 seeks to protect strategic views identified in the London View Management Framework. Tower Hamlets Local Plan D.DH4 reiterates this requirement and requires developments to preserve and positively contribute to the skyline of strategic importance.

7.8 Within the scope of the proposal are significant works to the Grade II Listed Blackwall Yard Graving Dock on site. The application is accompanied by a Heritage Assessment, which in great detail impacts the heritage assets on site, the scope of works, and the statutory and legislative requirements around their preservation and the assessment of harm.

7.9 Blackwall Yard, as described within the Heritage Assessment prepared by Montagu Evans, was a shipyard associated with the operation of the East India Trading Company who were formed in 1600 following the grant of an East Indies trading licence by Queen Elizabeth I. Blackwall Yard was established by the Company in the 17th Century, replacing an earlier used yard in Deptford. The Yard was expanded in the late 17th Century and became the largest wet dock in England. The below Figure is a map of Blackwall Yard and the surrounds in 1703.

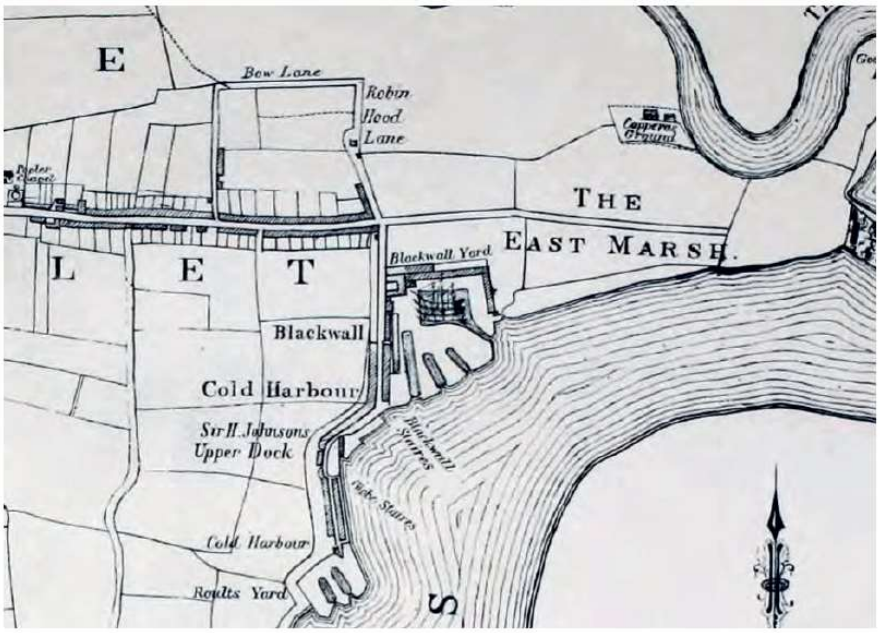
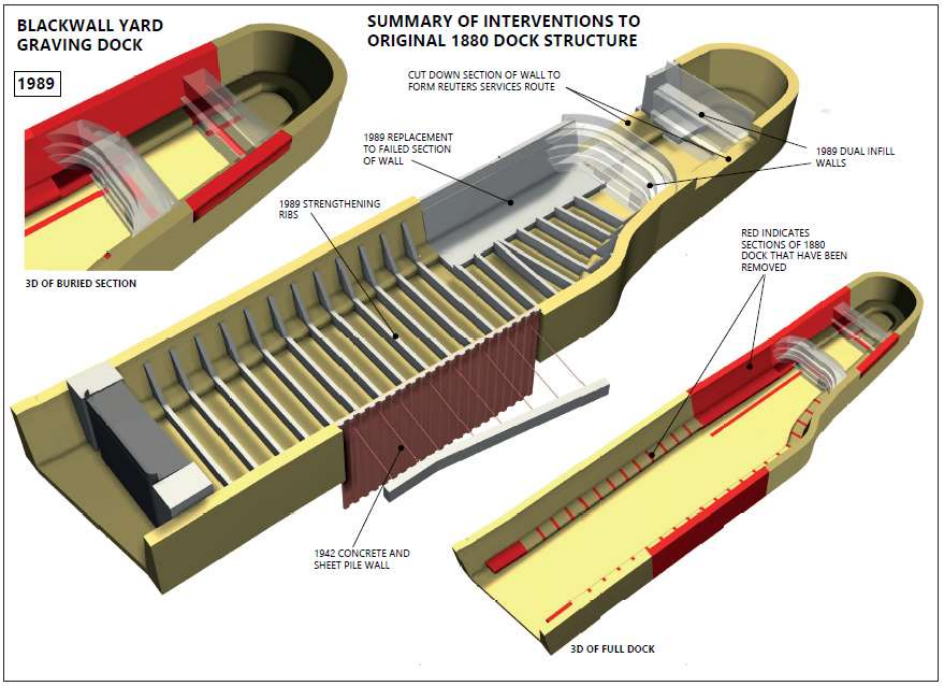


Figure 34: Blackwall Yard in 1703

7.10 The Listed Graving Dock on site was built as a dry dock between 1779 and 1799 as indicated by survey maps. modified an altered a substantial number of times over it's years of operation. Over the next 220 years, the Graving Dock was to be significantly altered and changed over time as its use evolved over time. Over the 18th and 19th Centuries, the Dock was extended and enlarged. By the 20th Century much of the surrounding docks had been filled in, or bomb damaged, with the Blackwall Yard Graving Dock remaining one of the only surviving docks at this locality. The adjacent western dock was filled in at the site of the adjacent Thomson Reuters (now Telehouse South) building.

7.11 In 1983 the Blackwall Yard Graving Dock was Listed, before being partially concreted in and extensively modified in 1989. The below Figures highlight the series of interventions taken with respect to the original dock form.



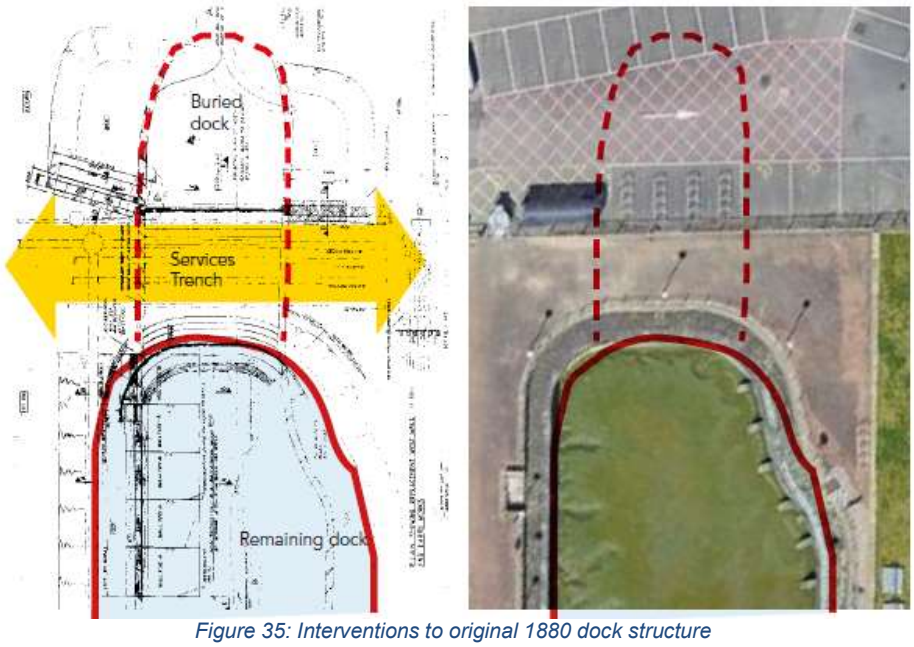


Figure 35: Interventions to original 1880 dock structure

7.12 It is noted that public access to the historic Graving Dock has been restricted for over 30 years, prior to its infilling in 1989. While visible at glimpses while traveling westbound on the elevation DLR from East India DLR, or from parallel views at Meridian Square, pedestrians have been unable to access and enjoy the industrial heritage of the Blackwall Yard Graving Dock for a considerable length of time.

7.13 The proposed scope of works to the dock include partially infilling the base of it, to allow for it to be utilised as a public open space – contributing towards the Site Allocation requirement of 0.4ha of public open space on site. The current plan form, inclusive of the distinct 'kink' at its northern most edge, will be retained and preserved (as noted in the below Figure). The robust concrete and masonry finishes of the existing dock edge will retained with sympathetic plantings included in the landscaping. The southern edge of the dock where it meets the River Thames will be filled with water, notionally for the purpose of open water swimming.

Figure 36: Graving Dock, as viewed from Plot 1

7.14 The proposed works would constitute a significant revitalisation of the dock, but would fundamentally alter its character forever. Mindful of this, officers must carefully consider the heritage harm and benefit associated. LBTH Conservation Officers welcome the alterations to the dock and note that the proposal represents *"the opportunity to breathe new life into the heritage asset and create a central focal point to the overall development that celebrates the maritime and trading history of the area is welcomed by Place Shaping".*

7.15 Notwithstanding this tacit support of redevelopment, LBTH Conservation Officers raise specific concerns with respect to the subdivision of the dock and the partial infilling with water. While it is noted that the Georgian and Victorian Society both recommend fully infilling the dock with water, given its over 200 year operational use as a dry-dock, LBTH officers would have preferred a wholly 'dry' and landscaped solution in line with the proposals for the northern half of the site.

7.16 LBTH Conservation Officers expand within their consultation response to note that *"…the wider benefits of the proposals are acknowledged and, on balance while the proposed alterations to the dock fail to comply with the objectives of S16 and S66 of the PLBCAA, the benefits delivered by the scheme would clearly outweigh the direct harm to the dock".* In reaching the decision on the acceptability of harm, which is deemed as less than substantial by Heritage England and LBTH Officers, these noted public benefits must be considered.

7.17 It is noted that Historic England and the Greater London Archaeological Advisory Service (GLAAS) raise similar concerns to that of LBTH Conservation offers with respect to the subdivision of the dock and requested through conditioning that further historic interpretation be implemented within the landscaping strategy. Officers consider this to be appropriate to ensure the historic fabric of the dock is celebrated to its fullest extent within the consent.

7.18 It is also noted that within Montagu Evans' Heritage Assessment they take a contrary view that statutory tests at S16(2) and S66(1) of the Planning (LBCA) Act 1990 are satisfied and that no harm is apparent. They go on to conclude that the proposed works would in fact preserve, and better reveal the significance of the dock.

7.19 In taking the view that the harm would be less than substantial to the heritage asset, notwithstanding the difference of opinion taken by the applicant team and statutory consultees, the wider public benefits of the site are considered against this harm. Notably the opening up of the site itself, and access to the dock for the first time in 30 years is considered a public

benefit in and of itself, as well as the considerable weight given to the provision of housing, affordable homes, primary school and public open space throughout the site.

7.20 Mindful of Section 196 of the Act, officers take the view that the enhancement of the dock – in any fashion that retains its original character – is a public benefit to the scheme despite the potential harm associated. The Dock lies at the heart of the development and has been designed in such a way to encourage future generations of Londoners to interact with over 300 years of maritime heritage, and as such the interventions are considered acceptable. The full public benefits test pursuant to s196 of the Act is undertaken at the end of this section.

7.21 The Townscape Heritage Visual Impact Assessment (THVIA) that forms part of the ES considers and assesses cumulative schemes within a 1km radius of the site, including all above ground heritage assets and Conservation Areas (detailed in the Figure Below).

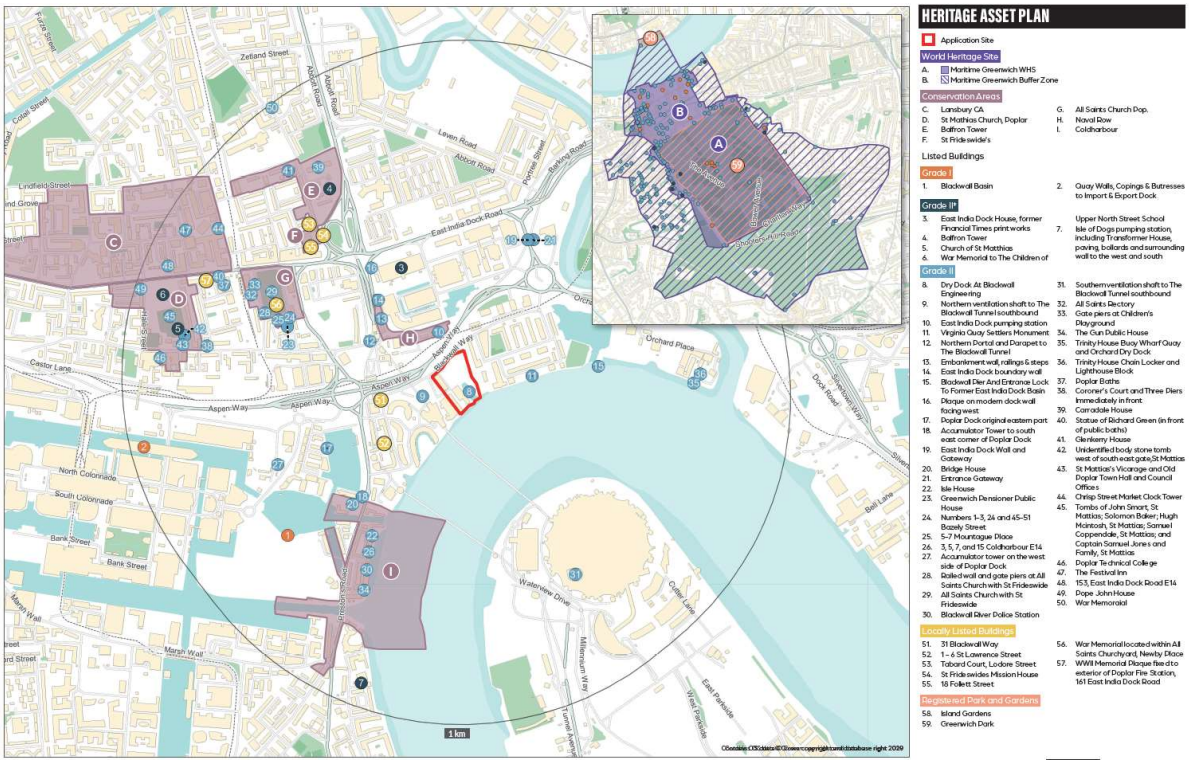


Figure 37: Identified Heritage Assets within 1km of application site

7.22 Of particular note within the scope of the THVIA is the Naval Row Conservation Area immediately to the north of the site, across Aspen Way and the Grade II Listed Poplar All Saints Church approximately 600m north-west of the site. The open character of the Church and limited existing buildings within its background and setting ensure that any significant development on the site would protrude within its setting.

7.23 As discussed under Design above, none of the Designated Borough Views or strategic views identified in the London Plan would be affected by the proposed tall building.

7.24 In terms of heritage assets, the tallest buildings on site are prominently visible in the setting of a number identified heritage assets. In terms of the setting of the neighbouring conservation areas Lansbury, Naval Row, All Saints, Balfron Tower, and St Frideswide's the proposed development would not change the varied taller modern character of those settings and would not therefore harm the ability to appreciate the heritage significance of the conservation areas, which is the NPPF policy test.

7.25 With regards to other neighbouring heritage assets officers conclude that the proposed tall building would cause some harm to the setting of a nearby heritage asset, namely the Grade II Listed Poplar All Saints Church. Three views from and around the Church are included within the submitted THVIA (views 17, 18, and 19). The two tallest buildings on site, within Plot 1, are noticeable in the background of the Church as viewed from East India Square at Chrisp Street (view 19).

Figure 38: Tower blocks of proposal in background of Poplar All Saints Church

7.26 The tallest tower block is located immediately behind the spire, with the lower block falling away and separated comfortably from the spire. It is noted in cumulative assessment that a considerable number of large consented buildings, notably those at Blackwall Reach, would interfere more significant with the setting of the Church – however the harm associated with the proposal is considered in isolation of that.

7.27 It is considered that there would be harm associated with the proposal and its interference with the at present uncluttered setting of Poplar All Saints Church, and it is viewed as less than substantial. This is acknowledged by Montagu Evans in their Heritage Assessment, and LBTH Conservation Officers.

7.28 Whilst the pair of towers would also be visible in the setting of other listed buildings included within the scope of the THVIA it is officers view, and that of LBTH Conservation Officers, that the setting of these heritage assets already consist of a varied and modern built form which includes tall buildings similar in scale to the proposed in the application and as such would cause no harm.

7.29 The likely overall public benefits of the proposed development can be summarised as follows:

- Redevelopment of an inaccessible private car-park, removing over 200 parking spaces
- Opening of the Thames Path
- New 2FE primary school
- 898 new homes (given substantive weight mindful of the Council's Housing Delivery Test)
- 35% affordable housing at a 70:30 split in favour of social rent
- New public open spaces
- New flexible commercial units for the benefit the local community dislocated from local Centres
- Car-free development providing for over 1,500 cycle parking spaces
- Over 120 jobs
- Wider improvements to Blackwall Way and associated public highway
- New local trainee and apprenticeships
- Public play spaces
- Enhanced biodiversity on site, including various green roofs and meadowlands
- Non-residential space to meet BREEAM 'Excellent' rating;
- Improved flood defences on site

- Enhanced access to the Grade II Listed Blackwall Yard Graving Dock, and much needed refurbishments

7.30 Officers consider that, on balance, the likely overall planning benefits of the proposed development would outweigh the 'less than substantial harm' to the heritage assets identified above.

Archaeology

7.31 Development plan policies require measures to identify record, protect, and where appropriate present the site's archaeology. The site lies within the Blackwall Tier 2 Archaeological Priority Area which was designated for its potential to contain evidence of prehistoric activity, particularly settlement and use in the Neolithic period; evidence of later medieval and post-medieval industrial development related primarily to ship. The application, as such, has been referred to the Greater London Archaeological Advisory Service (GLAAS).

7.32 The ES (Chapter 6) identifies likely 'minor' and 'moderate' adverse effect relating to construction phase of development and advises that as a mitigation method that all work be undertaken in accordance with a Written Scheme of Investigation and it is recommended that this is secured by condition. Significant effects are also noted on datable peat deposits, prehistoric remains, and remains of later 18th and early 19th contrary shipyard.

7.33 In their consultation response, GLAAS identifies that there is likely to be remains related to two period of history. Prehistoric evidence remains of riverside exploitation by early humans, as does the obvious remnants of the site's industrial and maritime history between the 17th to 20th Century. Officers note that the extents of the original dock, now infilled and buried, once extended considerably further into the site.

7.34 While acknowledging the likelihood of finding archaeological remains on site, GLAAS advises that given the lack of basements on site that no further pre-determination work is required and recommend the imposition of a two-stage condition on consent requiring the submission of a Written Scheme of Investigation (WSI) for evaluation, and then following completion of the first stage a WSI for investigation. The conditioned will be placed on consent.

Neighbour Amenity

7.35 Development Plan policies seek to protect neighbour amenity safeguarding privacy, not creating allowing unacceptable levels of noise and ensuring acceptable daylight and sunlight conditions.

<u>Privacy & Outlook</u>

7.36 The proposed buildings are located and the proposed flats have been designed such that the privacy and outlook of people living in existing homes would be safeguarded. Particular adjacencies of note are as follows:

- Wingfield Court
- Longitude House
- John Smith Mews

7.37 All buildings on site have been carefully designed to minimise the harm done to adjacent developments with respect to privacy and outlook. While it is acknowledged that some loss of amenity with respect to outlook will occur to east aspect flats of Wingfield Court and Longitude House, it is considered that the separation distance between these two blocks and Plot 3 of the development is sufficient to minimise any unreasonable loss of amenity with respect to outlook or privacy. Illustrative views from these particular blocks are highlighted in the Figures below. While it is noted that a number of objections have been received with respect to loss of private views, these do not constitute planning matters.

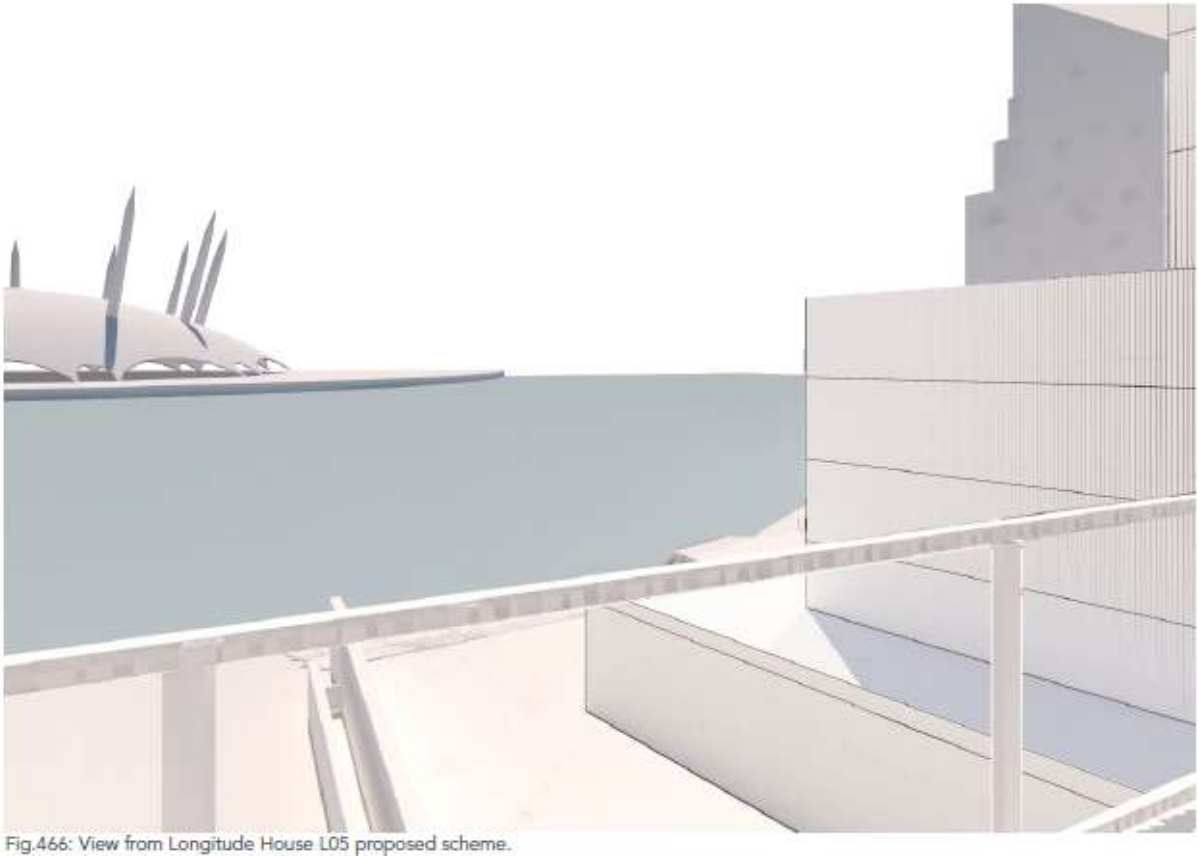


Fig.466: View from Longitude House L05 proposed scheme.

Figure 39: View from Longitude House (Level 5)

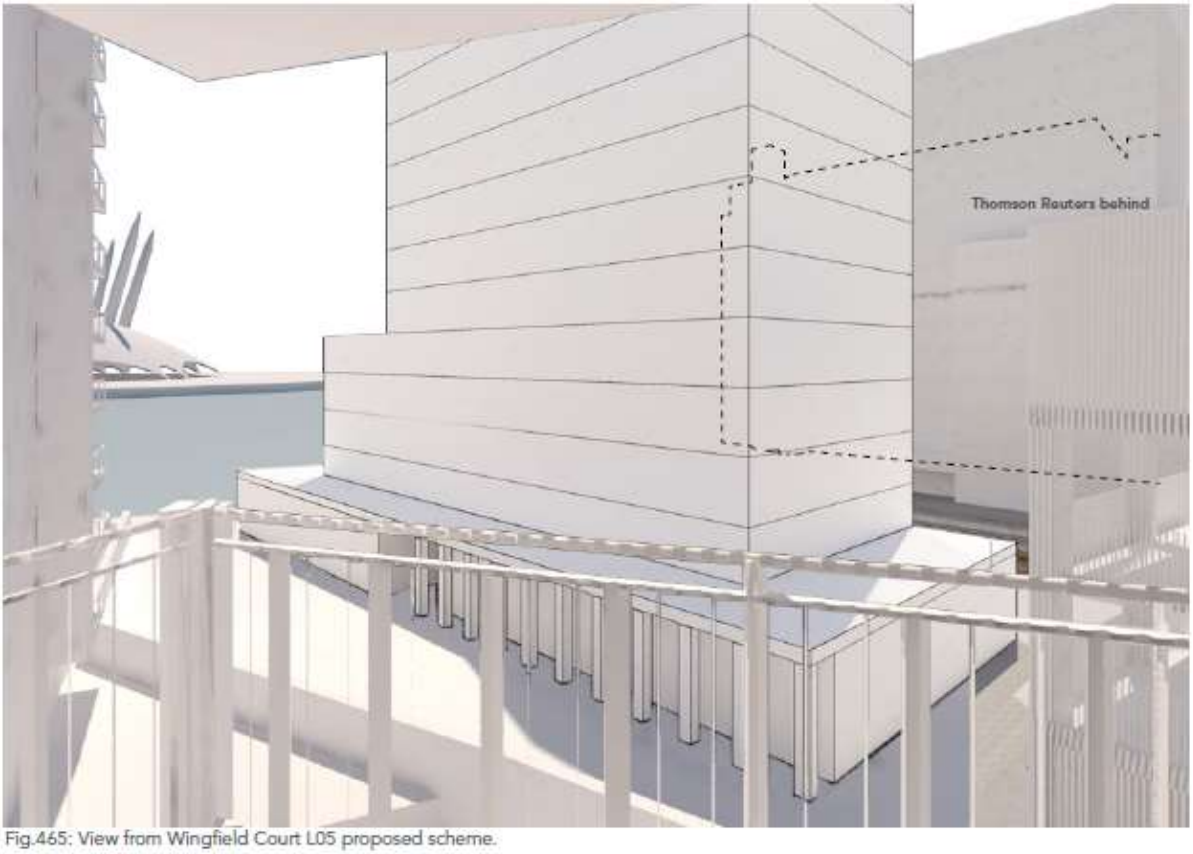


Fig.465: View from Wingfield Court L05 proposed scheme.

Figure 40: View From Wingfield Court (Level 5)

7.38 With respect to occupants of John Smith Mews, the residential block of Plot 2 has been carefully designed in order to limit as much as practical any perception of overlooking or loss of privacy for residents of these dwellings. Along the eastern facades to this block, living spaces have been configured to face away from the eastern elevation, while corner balconies provide a degree of privacy for future occupants as well as existing residents. While there will be an increased sense of enclosure to a small degree for occupants of John Smith Mews

within their rear gardens, it is considered that the separation distance between their rear windows to habitable rooms is great enough to avoid a sense of overbearing associated with this.

7.39 In terms of impacts due to the school, it is noted that the school has been carefully designed throughout pre-application in order to limit its impacts to adjoining neighbours with respect to both outlook and privacy. All windows to the eastern elevation facing residents of John Smith Mews are high level, with extruding fins to framing the fenestration and limiting oblique views in and out of the classrooms. The high level Multi-Use Games Area (MUGA) will be recessed behind a parapet wall, and won't allow students or users to overlook into private spaces. As such, it is considered that there are no adverse privacy or overlooking impacts associated with the school.

Daylight, Sunlight & Overshadowing

7.40 Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011).

7.41 To calculate daylight to neighbouring properties, the BRE guidelines, referenced in the Council's Local Plan policies, emphasise that vertical sky component (VSC) is the primary assessment together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be assumed. For sunlight, applicants should calculate the annual probable sunlight hours (APSH) to windows of main habitable rooms of neighbouring properties that face within 90˚ of due south and are likely to have their sunlight reduced by the development massing. For Sun Hours on Ground (SHoG) assessment, the requirement is that a garden or amenity area with a requirement for sunlight should have at least 50% of its area receiving 2 hours of sunlight on 21st March.

7.42 The ES assesses the likely significant impact of the proposal on the daylight and sunlight on surrounding residential properties (sensitive receptors) identified in the Figure below.

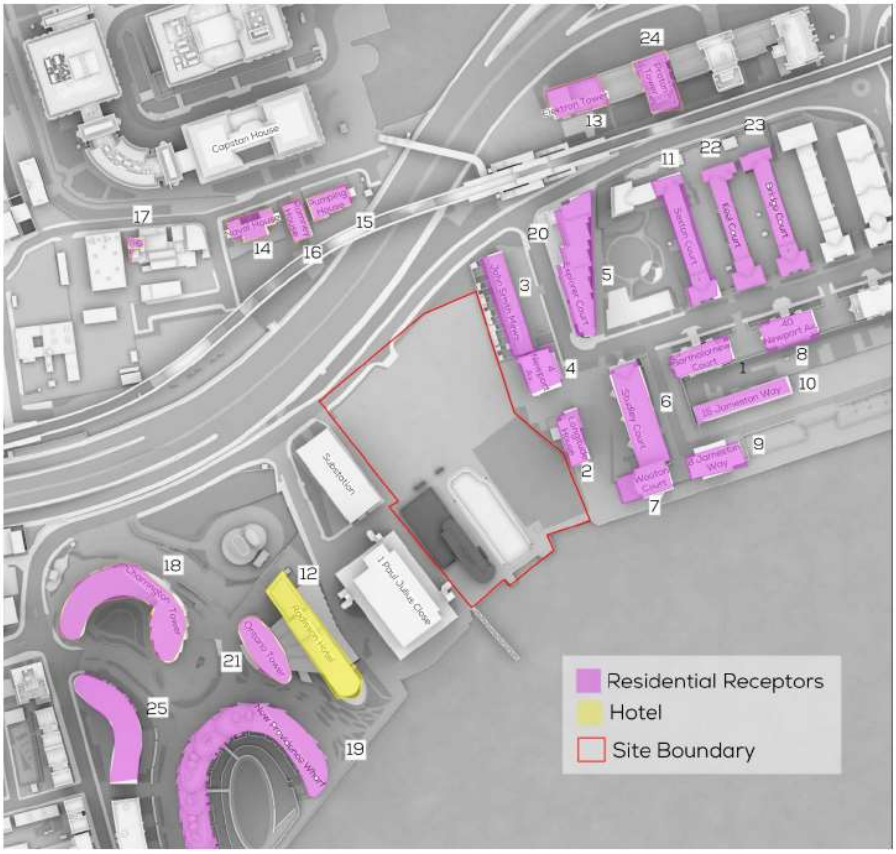


Figure 41: Daylight & Sunlight Sensitive Receptors

7.43 There is no industry-standard categorisation for impacts that exceed BRE guidelines. However, for VSC, NSL and ASPH, the Council consistently uses the following categories:

- Reduction less than 20% - Negligible
- Reduction of 20% - 29.9% - Minor adverse
- Reduction of 30% - 39.9% - Moderate adverse
- Reduction greater than 40% - Major adverse

7.44 The ES adopts the above significance criteria for VSC, NSL and ASPH assessment and also adopts them for its SHoG assessment.

7.45 Daylight effects considered to be 'moderate' or 'major' in scale are determined using professional judgement as well as the established criteria. The ES assumes that a significant effect is either 'moderate adverse' or 'major adverse' in scale (i.e. 'negligible' or 'minor adverse' effects are considered not to significant in EIA terms).

7.46 The submitted technical reports in support of the Daylight and Sunlight for the scheme was reviewed by Delva Patman Redler on behalf of the Council with a review issued on 18 February 2021. This review sought a number of clarifications and review requests which was subsequently responded to by the Applicant, and included some additional modelling as it related to impacts associated with windows/rooms to Naval Row.

7.47 Additional testing was undertaken at 26 Naval Row which determined that any impacts to this property would be negligible (not significant) in nature.

7.48 A final review issued by Delva Patman Redler was issued on 24 March 2021 which confirmed that no further clarifications were needed, while outlining in some instances a differing of opinions on some technical interpretations.

Daylight and sunlight summary

7.49 A summary of the results is set out below.

Table 10: Daylight and sunlight summary

	VSC	**NSL**	**APSH**	
	No. of windows/rooms tested		**No. of rooms tested**	
	2,849	**2,057**	**Other**	**Winter**
			1,486	**1,486**
Negligible (0-19% reduction)	2,636	1,778	1,283	1,352
Minor adverse (20-29%)	209	81	27	2
Moderate adverse (30-39%)	47	73	23	5
Major adverse (>40%)	213	125	153	127

Daylight – likely significant effects

Address	VSC						NSL					
	Total No. of Windows	No. Windows that meet BRE criteria	Below BRE Guidelines				Total No. of Rooms	No. Rooms that meet the 0.8 times former value criteria	Below BRE Guidelines			
			20-29.9% Reduction	30-39.9% Reduction	>40% Reduction	Total			20-29.9% Reduction	30-39.9% Reduction	>40% Reduction	Total
Bartholomew Court	120	115	4	1	0	5	62	62	0	0	0	0
Longitude House	66	17	1	0	48	49	45	18	4	7	16	27
John Smith Mews	96	13	12	8	63	83	84	24	5	6	49	60
4 Newport Ave-Wingfield Court	118	30	18	3	67	88	80	38	14	6	22	42
Explorer Court	164	97	57	7	3	67	144	105	13	12	14	39
Studley Court	172	80	50	21	21	92	127	66	19	22	20	61
Wooton Court	105	68	27	4	6	37	74	61	4	5	4	13
40 Newport Ave-Adventurers Court	136	136	0	0	0	0	74	74	0	0	0	0
8 Jamestown Way-Cape Henry Court	58	58	0	0	0	0	31	31	0	0	0	0
15 Jamestown Way-Docklands House	60	60	0	0	0	0	60	60	0	0	0	0
Sexton Court	204	198	4	0	2	6	163	157	1	5	0	6
Radisson Hotel	109	89	20	0	0	20	95	89	3	3	0	6
Elektron Tower	160	160	0	0	0	0	159	159	0	0	0	0
Naval House	56	49	7	0	0	7	36	36	0	0	0	0
Pumping House	28	28	0	0	0	0	10	7	1	2	0	3
Romney House	19	16	0	1	2	3	15	15	0	0	0	0
26 Naval Row	14	14	0	0	0	0	8	8	0	0	0	0
Charrington Tower	123	119	4	0	0	4	54	54	0	0	0	0
New Providence Wharf	318	318	0	0	0	0	234	234	0	0	0	0
Bright Horizons East India Dock Day Nursery	8	3	3	1	1	5	3	3	0	0	0	0
Ontario Tower	231	231	0	0	0	0	88	88	0	0	0	0
Keel Court	105	105	0	0	0	0	92	89	2	1	0	3
Bridge Court	136	134	1	1	0	2	112	110	2	0	0	2
Proton Tower	198	198	0	0	0	0	162	162	0	0	0	0
Michigan Building	45	44	1	0	0	1	45	28	13	4	0	17
Total	2849	2380	209	47	213	469	2057	1778	81	73	125	279

7.50 The below section will seek to detail the **overall** prescribed impacts to modelled receptors as they relate to impacts associated with the development. Buildings considered to have less than 20% daylight impacts (negligible) across **all** windows or room results won't be examined in greater detail within the report, but have informed the assessment of the application. These receptors are:

- 40 Newport Avenue-Adventurers Court;
- 8 Jamestown Way-Docklands House;
- Elektron Tower;
- 26 Naval Row;
- New Providence Wharf;
- Ontario Tower; and
- Proton Tower

7.51 For the remaining receptors, the impacts are detailed in full below with an analysis of the impacts, their harm and relationship to significant impacts as defined by the Environment Statement. As noted above, negligible and minor impacts are considered as 'not significant' within this context while moderate and major are identified as 'significant' impacts.

Bartholomew Court – 'negligible impact'

7.52 This building is located east of the Site. A total of 120 windows serving 62 rooms were assessed for daylight within this building.

7.53 For VSC, 115 of the 120 (95.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.54 Of the five affected windows, four would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

7.55 Two of the affected windows have existing VSC levels below 1.1% and therefore the percentage alteration is disproportionate to what the occupant is likely to experience. Both windows serve bedrooms which are considered less important in relation to daylight alterations in BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011.

7.56 A third window serving a bedroom would experience an impact of Minor Adverse significance. This window has a low existing VSC level of 10% and therefore the alteration is not likely to be noticeable to the occupant.

7.57 The remaining two windows serve rooms of unknown use, retaining 15.7% and 20% VSC which is considered commensurate and good within the urban environment.

7.58 For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.59 Overall, owing to the retained levels of light and affected bedrooms which are considered less sensitive to daylight alterations in BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011, the effect to this building is considered **negligible (not significant).**

Longitude House 'moderate adverse'

7.60 This building is located east almost directly adjacent to the Site boundary and therefore may be considered a 'bad neighbour' in accordance with Appendix F of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. As such, it currently enjoys more than its fair share of natural light from the existing condition of the Site, causing any increase in massing to result in substantial impacts on daylight and sunlight to its Site facing windows and rooms. A total of 66 windows serving 45 rooms were assessed for daylight within this building.

7.61 For VSC, 17 of the 66 (25.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.62 Of the 49 affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst 48 would experience an alteration greater than 40% which is considered a Major Adverse Effect.

7.63 Of the 49 affected windows, 27 are bedrooms, which are considered less important in relation to daylight alterations in paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. Each of the affected bedrooms are single aspect.

7.64 A further 19 affected windows serve living-kitchen-diners (LKDs), which are dual aspect with the second window remaining unaffected by the Proposed Development. The affected windows would retain between 11% on the lowest storeys to 19.9% on the tenth storey, which may be considered good and commensurate within the urban environment. It should be noted that these windows are also located beneath balconies which inherently obstruct view of the sky and thereby daylight availability. Additionally, within the no balconies assessment, the retained VSC levels improve, highlighting that the reduction is partially a function of the building design itself.

7.65 The remaining two windows are of unknown use and retain 16.5% and 17.1% VSC, respectively.

7.66 For NSL, 18 of the 45 (40%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.67 Of the 27 affected rooms, four would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and seven would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 16 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.68 Each of the rooms affected in relation to NSL has very good sky visibility, tending towards 100% on the upper storeys, given that they directly overlook a vacant Site. Despite the percentage alteration, the affected rooms would retain between 32.7-77% NSL which may be considered commensurate within an urban environment.

7.69 Overall, given the disproportionately high levels of daylight in the baseline condition and retained levels despite the percentage reduction, the effect to this building is considered **moderate adverse (significant).**

John Smith Mews 'major adverse'

7.70 These terraced houses located east of the Proposed Development, with the rear of the building facing the Site. The rear façade of this building is defined by a number of conservatory extensions and eaves overhanging the top storey windows. A total of 96 windows serving 84 rooms were assessed for daylight within this building.

7.71 For VSC, 13 of the 96 (13.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.72 Of the 83 affected windows, 12 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and eight would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 63 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.73 From external observation and layouts obtained for the building, the first to third floor windows all serve bedrooms, which paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011 states have less expectation for daylight. An assessment of the building without the overhanging eaves has been undertaken, showing that the retained levels to the upper floor bedroom windows would increase by an absolute level of ca. 1%, demonstrating that the reductions are partially caused by existing obstructions.

7.74 Therefore, the windows of primary concern are the 20 windows, serving 14 living rooms and conservatories on the ground level. Five of these retain between 16.3-22.4% VSC which may be considered good and commensurate within an urban environment. Whilst there are significant reductions in the VSC values at the remaining 15 windows as a result of the Proposed Development, this is generally due to the underdeveloped nature of the Site in contrast to the dense urban nature of the surrounding environment. Therefore, in the existing condition even the ground level windows enjoy good light levels. The introduction of even a modest massing on the currently vacant Site would likely result in disproportionate reductions in the light levels enjoyed by these windows.

7.75 It should also be noted that the conservatory extensions would obstruct the availability of daylight to the neighbouring windows.

7.76 For NSL, 24 of the 84 (28.6%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.77 Of the 60 affected rooms, five would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and six would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 49 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.78 As noted above, the rooms located on the first to third storeys serve bedrooms which are considered less important in relation daylight alterations as stated in paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011.

7.79 The 14 affected living rooms and conservatories on the ground floor enjoyed NSL levels of above 98% in the baseline condition owing to the vacant nature of the Site and as such any increase in massing would result in losses of this magnitude.

7.80 Overall, despite the percentage change in daylight, a number of the affected living rooms and conservatories would retain VSC levels which may be considered good and commensurate within an urban environment, with the majority of affected windows located on the first to third storeys serving bedrooms which are less sensitive to daylight alterations. Nevertheless, given the significant percentage changes in daylight which are predicted, the effect to this row of terraced houses is considered **major adverse (significant).**

4 Newport Avenue – Wingfield Court - 'moderate adverse.'

7.81 This building is located east of the Site, at the southern end of John Smith Mews. The façade is defined by protruding balconies located to the north eastern corner of the building. A total of 118 windows serving 80 rooms were assessed for daylight within this building.

7.82 For VSC, 31 of the 118 (26.3%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.83 Of the 87 affected windows, 17 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and three would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 67 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.84 Of the 87 affected windows, 44 serve bedrooms, which are less sensitive to daylight alterations as stated in paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011.

7.85 A further 35 serve living rooms. There is a bank of living room windows which have very low VSC values, with the majority of living rooms served by secondary windows facing away from the Site, therefore unaffected by the Proposed Development and able to enjoy very good levels of daylight.

7.86 The remaining eight serve rooms of unknown use, each located on the top storey. They currently enjoy good levels of daylight in the baseline, overlooking the empty Site. Given that they are obstructed by features present in the baseline, the reductions to these windows

7.87 For NSL, 38 of the 80 (47.5%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.88 Of the 42 affected rooms, 14 would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and four would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 24 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.89 The living room windows are located beneath 3m deep balconies resulting in very poor existing values when compared to the other windows on the same floor which are not obstructed by the balconies. Therefore, the introduction of even a modest massing on the Site will result in low retained values.

7.90 In accordance with paragraph 2.2.11 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011, a no balconies assessment has been undertaken. The result of this assessment have indicated improvements to the VSC results for these windows.

7.91 Site facing living room windows with retained values ranging between 12-18%. Therefore, the presence of the balconies contributes to the low retained values to the Site facing living room windows rather than the height and extent of the Proposed Development.

7.92 Overall, owing to the retained levels of living rooms, number of affected rooms being bedrooms which are less sensitive to daylight alterations and the presence of existing structures in the baseline causing limiting daylight availability in the baseline condition, the effect to this building is considered **moderate adverse (significant)**.

Explorer Court – 'minor adverse'

7.93 This building is located east of the Proposed Development, with the Site facing façade defined by recessed balconies and staggered elevations which are set back from the building line. A total of 164 windows serving 144 rooms were assessed for daylight within this building.

7.94 For VSC, 97 of the 164 (59.1%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.95 Of the 67 affected windows, 57 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and seven would experience an alteration between

30-39.9% which is considered a Moderate Adverse Effect. The remaining three windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.96 All the affected window enjoys very good levels of daylight owing to the vacant nature of the Site and as such any increase in massing would result in losses of this magnitude. Of the 67 affected windows, 44 serve bedrooms, which include all three which are subject to Major Adverse effects. BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011 notes that bedrooms are less sensitive to daylight alterations. At the remaining affected windows, which serve LKDs and unknown residential uses, levels of light considered commensurate within the urban location ranging from 13.3-23.3% would be retained.

7.97 For NSL, 105 of the 144 (72.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.98 Of the 39 affected rooms, 13 would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and 12 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 14 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.99 Of the 39 rooms affected for NSL, 21 are bedrooms, which are considered less important in relation to daylight distribution as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. It should be noted that the affected rooms are located behind recessed balconies or set back from the building line, which inherently restricts view of the sky.

7.100 Overall, owing to the majority of impacts occurring at bedrooms, which are considered less sensitive and the retained levels of VSC at the affected LDKs, which obstructions occurring in the existing condition which inherently limits daylight availability, the effect to this building is considered **minor adverse (not significant).**

Studley Court – 'moderate adverse'

7.101 This building is located east of the Site. The Site facing façade is defined by banks of protruding balconies and set back elevations. A total of 172 windows serving 127 rooms were assessed for daylight within this building.

7.102 For VSC, 80 of the 172 (46.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.103 Of the 92 affected windows, 50 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 21 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 21 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.104 The majority – 50 of the 92 total – of affected windows served bedrooms, which are less sensitive to daylight alterations as per paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. The remaining 42 serve living/dining rooms of which a number are located beneath or diagonally beneath balconies, which inherently restrict daylight availability as shown by their comparatively lower baseline VSC levels. Impacts of Major Adverse significance occur to 14 of these windows, however each of these are obstructed in the baseline, as shown by their lower existing VSC levels, ranging from 10-16.4% VSC, to comparable windows and therefore the reduction is a function of the building design itself. A further two windows have very low existing VSC levels below 1.9% and therefore the percentage alteration is disproportionate to what the occupant would experience.

7.105 For NSL, 66 of the 127 (52%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.106 Of the 61 affected rooms, 19 would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and 22 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 20 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.107 These rooms, of which 36 are the aforementioned bedrooms, are considered less important in relation to daylight alterations. The remaining 25 are living/dining rooms which are located beneath or diagonally beneath protruding balconies which inherently limits daylight distribution within these rooms. Whilst 11 reductions of Major Adverse significance occur to these living diners, each of them would retain 34.5-68.4% NSL.

7.108 Overall, owing to majority of impacts occurring at bedrooms and low baseline levels caused by existing obstructions resulting in proportionally greater losses in daylight, the effect to this building is considered **moderate adverse (significant).**

Wooton Court – 'minor adverse'

7.109 This building is located east of the Proposed Development and has a perpendicular adjoining relationship with the previously discussed building, Studley Court. The Site facing façade is defined by a stack of protruding balconies. The majority of room uses within this building could not be verified and as such are all treated as equally sensitive as a worst-case scenario. A total of 105 windows serving 74 rooms were assessed for daylight within this building.

7.110 For VSC, 68 of the 105 (64.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.111 Of the 37 affected windows, 27 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and four would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining six windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.112 The reductions of Major Adverse significance occur on the ground and first storey, where lower existing VSC levels can be seen, below 11.3%. Owing to the presence of balconies and neighbouring existing buildings, low VSC levels can be observed at a number of windows where impacts occur. There are also a portion of windows which are completely unobstructed in the baseline, which face the vacant Site, and enjoy good levels of daylight. These windows would retain in excess of 20% VSC which is considered good and commensurate within an urban location.

7.113 For NSL, 61 of the 74 (82.4%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.114 Of the 13 affected rooms, four would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining four rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.115 Overall, owing to the obstructions to daylight in the baseline, the retained VSC levels at the majority of affected windows as well as the small proportion of significant reductions, the effect to this building is considered **minor adverse (not significant)**.

Sexton Court – 'negligible'

7.116 This building is located east of the Proposed Development. A total of 204 windows serving 163 rooms were assessed for daylight within this building.

7.117 For VSC, 198 of the 204 (97.1%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.118 Of the six affected windows, four would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst two would experience an alteration greater than 40% which is considered a Major Adverse Effect.

7.119 Two of the windows, which would experience alterations greater than 40% have very low existing levels VSC below 1.5% and therefore the percentage alteration is disproportionate to what is likely to be noticeable to the occupant. The remaining four windows are set back from the building line with comparatively lower baseline levels of VSC.

7.120 For NSL, 157 of the 163 (96.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.121 Of the six affected rooms, one would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect whilst five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

7.122 All six rooms are set back from the building line which inherently limits view of the sky, each retaining between 34.7-60.4% NSL.

7.123 Overall, owing to the high level of BRE compliance, with alterations occurring at windows that are obstructed in the baseline or where the existing levels are low and therefore the percentage change is disproportionate to what the occupant is likely to experience, the effect to this building is considered **negligible (not significant)**.

Radisson Hotel – 'negligible impact'

7.124 This building is a hotel, where any occupants are likely to be temporary and therefore considered to be of lower sensitivity. A total of 109 windows serving 95 rooms were assessed for daylight within this building.

7.125 For VSC, 89 of the 109 (81.7%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.126 Of the 20 affected windows, all would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect.

7.127 Each of the windows, serving bedrooms within the hotel, would retain 16.2-26.3%VSC level is considered to be a good level of daylight within a hotel bedroom.

7.128 For NSL, 89 of the 95 (93.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.129 Of the six affected rooms, three would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect whilst three would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

7.130 Overall, owing to the lower sensitivity of the building in questions as well as the retained levels at each of the affected rooms, the effect to this building is considered **negligible (not significant)**.

Naval House – 'negligible impact'

7.131 This building is located to the north of the Site. A total of 56 windows serving 36 rooms were assessed for daylight within this building.

7.132 For VSC, 49 of the 56 (87.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.133 Of the seven affected windows, all would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect.

7.134 Four of the seven windows serve bedrooms, which paragraph 2.2.8 of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011 notes are less sensitive to daylight alterations. The remaining three windows serve living rooms retaining mid-teen VSC levels which may be considered good and commensurate within an urban environment.

7.135 For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.136 Overall, owing to the high level of compliance with criteria set out in BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011, the effect to the building is considered **negligible (not significant)**.

Pumping House – 'negligible impact'

7.137 This building is located to the north of the Proposed Development, with only the rear of the properties facing the Site. A total of 28 windows serving 10 rooms were assessed for daylight within this building.

7.138 For VSC, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.139 For NSL, seven of the 10 (70%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.140 Of the three affected rooms, one would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect whilst two would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

7.141 All three rooms are located beneath overhangs with the DLR flyover located directly in front of the windows thereby inherently limiting view of the sky, as shown by the comparatively lower existing NSL levels.

7.142 Overall, owing to the high level of BRE compliance, the effect to this building is considered **negligible (not significant).**

Romney House – 'minor adverse'

7.143 This building is located north of the Site, with the south eastern façade defined by recessed balconies. A total of 19 windows serving 15 rooms were assessed for daylight within this building.

7.144 For VSC, 16 of the 19 (84.2%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.145 Of the three affected windows, one would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst two would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.146 All three affected rooms have very low existing VSC values of below 7.9% and as such the percentage alteration is disproportionate to what the occupant is likely to experience.

7.147 For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.148 Overall, the effect is considered **minor adverse (not significant)**.

Charrington Tower – 'negligible impact'

7.149 This building is located west of the Site. A total of 123 windows serving 54 rooms were assessed for daylight within this building.

7.150 For VSC, 119 of the 123 (96.7%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.151 Of the four affected windows, all would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. Each of these windows retain VSC levels in the mid-teen range, which may be considered commensurate within the urban environment and the rooms they serve are in any case served by multiple other windows not affected by the Proposed Development.

7.152 For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.153 Overall, owing to the high level of compliance with criteria set out in BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011, the effect to the building is considered **negligible (not significant)**.

Bright Horizons East India Dock Day Nursery

7.154 This educational facility is located east of the Proposed Development on the ground floor of Explorer's Court. A total of eight windows serving three rooms were assessed for daylight within this building.

7.155 For VSC, three of the eight (37.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.156 Of the five affected windows, three would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining window would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.157 Three of the affected windows which would see Minor Adverse impacts would retain mid-teen to approximately 20% VSC, which may be considered commensurate within an urban location. The remaining two windows, which would see Moderate to Major Adverse reductions, are obstructed in the baseline owing to their location on a set back elevation as shown by their comparatively lower VSC levels.

7.158 For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.159 Overall, owing to the retained levels at the affected windows and existing obstructions limiting daylight availability in the baseline condition, the effect to this building is considered **minor adverse (not significant)**.

Keel Court – 'negligible impact'

7.160 This building is located east of the Proposed Development. A total of 105 windows serving 92 rooms were assessed for daylight within this building.

7.161 For VSC, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.162 For NSL, 89 of the 92 (96.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.163 Of the three affected rooms, two would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect whilst one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. These rooms would retain between 35.3-53.4%.

7.164 Overall, given the high level of BRE compliance with effect to this building is considered **negligible (not significant)**.

Bridge Court – 'negligible impact'

7.165 The building is located east of the Proposed Development. A total of 136 windows serving 112 rooms were assessed for daylight within this building.

7.166 For VSC, 134 of the 136 (98.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.167 Of the two affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.

7.168 For NSL, 110 of the 112 (98.2%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.169 Of the two affected rooms, both would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect.

7.170 Overall, owing to the high level of BRE compliance the effect to this building is considered **negligible (not significant)**.

Michigan Building – 'negligible impact'

7.171 The building is located east of the Proposed Development. A total of 45 windows serving 45 rooms were assessed for daylight within this building.

7.172 For VSC, 44 of the 45 (97.7%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.173 The affected window would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect.

7.174 The window serving room of unknown use has a low existing value owing to their location beneath a balcony, experiencing absolute alterations of 1.3% VSC and therefore the reduction would be unnoticeable to the occupant.

7.175 For NSL, 28 of the 45 (62.2%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.176 Thirteen of the affected rooms would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and four would experience an alteration in NSL between 30-39.9% which is considered a Moderate Adverse effect.

7.177 Each of the affected rooms of unknown use, are located beneath balconies which inherently obstruct daylight distribution within the rooms. However, each of the rooms would retain between 59.9-69.9% NSL, most of which are unaffected in terms of VSC.

7.178 Overall, owing to the high level of BRE compliance and obstruction to daylight a function of the balconies, the effect to this building is considered **negligible (not significant)**.

Sunlight – likely significant effects

Address	Total No. of Rooms	No. Rooms that meet BRE criteria	Annual PSH			Winter PSH		
			Below BRE Guidelines			Below BRE Guidelines		
			20-29.9% Reduction	30-39.9% Reduction	>40% Reduction	20-29.9% Reduction	30-39.9% Reduction	>40% Reduction
Bartholomew Court	47	46	0	1	0	0	0	0
Longitude House	40	16	0	0	24	0	0	7
John Smith Mews	84	17	0	1	64	0	0	48
4 Newport Ave-Wingfield Court	80	40	1	0	38	0	0	34
Explorer Court	138	100	14	15	1	0	4	22
Studley Court	118	87	4	6	21	2	0	14
Wooton Court	70	59	7	0	4	0	0	0
40 Newport Ave-Adventurers Court	57	57	0	0	0	0	0	0
8 Jamestown Way-Cape Henry Court	25	25	0	0	0	0	0	0
Sexton Court	158	158	0	0	0	0	0	0
Elektron Tower	159	159	0	0	0	0	0	0
Naval House	32	31	1	0	0	0	0	1
Pumping House	10	10	0	0	0	0	0	0
Romney House	15	14	0	0	1	0	0	1
26 Naval Row	8	8	0	0	0	0	0	0
Charrington Tower	43	43	0	0	0	0	0	0
New Providence Wharf	32	32	0	0	0	0	0	0
Bright Horizons East India Dock Day Nursery	3	2	0	0	0	0	1	0
Ontario Tower	11	11	0	0	0	0	0	0
Keel Court	87	87	0	0	0	0	0	0
Bridge Court	107	107	0	0	0	0	0	0
Proton Tower	162	162	0	0	0	0	0	0
Total	**1,486**	**1,271**	**27**	**23**	**153**	**2**	**5**	**127**

7.179 The below section will seek to detail the **overall** prescribed impacts to modelled receptors as they relate to impacts associated with the development. Buildings considered to have less than 20% sunlight impacts (negligible) across **all** windows or room results won't be examined in greater detail within the report, but have informed the assessment of the application. These receptors are:

- 40 Newport Ave-Adventurers Court;
- 8 Jamestown Way-Cape Henry Court;
- Sexton Court;
- Elektron Tower;
- Pumping House;
- 26 Naval Row;
- Charrington Tower;
- New Providence Wharf;
- Ontario Tower;
- Keel Court;
- Bridge Court; and
- Proton Tower.

Bartholomew Court – 'negligible impact'

7.180 This building is located east of the Site. A total of 47 rooms were assessed for sunlight within this building of which 46 (97.9%) would meet the BRE's criteria for both Annual and Winter PSH.

7.181 For Annual PSH, 46 of the 47 (97.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss between 30-39.9% which is considered a Moderate Adverse effect.

7.182 The affected room is a bedroom, which are less sensitive to sunlight alterations as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011.

7.183 For Winter PSH, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.184 Overall, owing to the high level of compliance and the affected room being a bedroom, the effect to this building is considered **negligible (not significant)**.

John Smith Mews – 'major adverse'

7.185 These terraced houses located east of the Proposed Development, with the rear of the building facing the Site. The rear façade of these properties are defined by a number of conservatory extensions and eaves overhanging the top storey windows. A total of 84 rooms were assessed for sunlight within this building of which 17 (20.2%) would meet the BRE's criteria for both Annual and Winter PSH.

7.186 For Annual PSH, 19 of the 84 (22.6%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.187 Of the 65 rooms affected annually, one would experience an alteration in Annual PSH between 30-39.9% which is considered a Moderate Adverse effect whilst 64 would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.188 For Winter PSH, 36 of the 84 (42.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining 48 see losses greater than 40%, which is considered a Major Adverse effect.

7.189 Given that each of the windows overlook an empty Site in the baseline and therefore enjoy very good levels of sunlight, reductions of this magnitude can be anticipated. The rear windows have a predominantly western orientation and receive very good access to afternoon sun over the empty Site. The front windows, which face away from the Proposed Development, have a predominantly eastern orientation and will be unaffected by the Proposed Development in terms of access to morning sun. 41 of the rooms affected in relation to APSH comprising conservatories, living rooms and rooms of unknown use, would retain between 14-23% APSH. Lower levels of sunlight would be retained at the remaining rooms, however, these can be attributed to the presence shading from the conservatory extension and eaves overhanging the top storey windows.

7.190 Overall, although the retained values may be considered commensurate within the urban location, given the significant predicted percentage change in sunlight levels, the effect to this terraced row of properties is considered **major adverse (significant)**.

Longitude House – 'negligible impact'

7.191 This building is located east almost directly adjacent to the Site boundary and therefore may be considered a 'bad neighbour' in accordance with Appendix F of BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. As such, it currently enjoys more than its fair share of natural light from the existing condition of the Site, causing any increase in massing to result in substantial impacts on daylight and sunlight to its Site facing windows and rooms. A total of 40 rooms were assessed for sunlight

within this building of which 16 (40%) would meet the BRE's criteria for both Annual and Winter PSH.

7.192 For Annual PSH, 16 of the 40 (40%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining 24 see losses greater than 40% which is considered a Major Adverse effect.

7.193 For Winter PSH, 33 of the 40 (82.5%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining seven see losses greater than 40% which is considered a Major Adverse effect.

7.194 Each of the rooms affected for both APSH and Winter PSH are bedrooms which are less sensitive to sunlight alterations, as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. Despite the reductions, 17 bedrooms would retain 20-23% APSH, with the remaining rooms obstruct by the presence of balconies.

7.195 Overall, owing to the level of BRE compliance, with all affected rooms being bedrooms, the effect to this building is considered **negligible (not significant)**.

4 Newport Avenue -Wingfield Court – 'moderate adverse'

7.196 This building is located east of the Site, at the southern end of John Smith Mews. The façade is defined by protruding balconies located to the north eastern corner of the building. A total of 80 rooms were assessed for sunlight within this building of which 40 (50%) would meet the BRE's criteria for both Annual and Winter PSH.

7.197 For Annual PSH, 41 of the 80 (51.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.198 Of the 39 rooms affected annually, one would experience an alteration in Annual PSH between 20-29.9% which is considered a Minor Adverse effect whilst 38 would experience an alteration greater than 40% which is considered a Major Adverse Effect.

7.199 For Winter PSH, 46 of the 80 (57.5%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining 34 see losses greater than 40% which is considered a Major Adverse effect.

7.200 Of the 39 rooms affected for APSH, 25 are bedrooms which are less sensitive to sunlight alterations, as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. A further nine are living rooms and room of unknown uses, which would experience Major Adverse reduction, which are partially a function of the shading from the building itself.

7.201 Overall, owing to the obstructions to sunlight in the existing baseline, and the proportion of rooms unaffected by the Proposed Development with the majority of affected rooms being bedrooms, the effect is considered **moderate adverse (significant)**.

Explorer Court – 'minor adverse'

7.202 This building is located east of the Proposed Development, with the Site facing façade defined by recessed balconies and staggered elevations which are set back from the building line. A total of 138 rooms were assessed for sunlight within this building of which 100 (72.5%) would meet the BRE's criteria for both Annual and Winter PSH.

7.203 For Annual PSH, 108 of the 138 (78.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.204 Of the 30 rooms affected annually, 14 would experience an alteration in Annual PSH between 20-29.9% which is considered a Minor Adverse effect and 15 would experience an alteration

between 30-39.9% which is considered a Moderate Adverse Effect. The remaining room would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.205 Of the 30 affected rooms, 19 are bedrooms which are considered less sensitive to sunlight alterations ass per, BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. The remaining 21 are LKDs, which would retain between 18-24% APSH, which may be considered commensurate within the urban location.

7.206 For Winter PSH, 112 of the 138 (81.2%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.207 Of the 26 rooms affected in the winter, four would experience an alteration in Winter PSH between 30-39.9% which is considered a Moderate Adverse effect whilst 22 would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.208 Owing to the number of affected rooms being bedroom and retained levels of sunlight at the LKDs, the effect to this building is considered **minor adverse (not significant)**.

Studley Court – 'moderate adverse'

7.209 This building is located east of the Site. The Site facing façade is defined by banks of protruding balconies and set back elevations. A total of 118 rooms were assessed for sunlight within this building of which 87 (73.7%) would meet the BRE's criteria for both Annual and Winter PSH.

7.210 For Annual PSH, 87 of the 118 (73.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.211 Of the 31 rooms affected annually, four would experience an alteration in Annual PSH between 20-29.9% which is considered a Minor Adverse effect and six would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 21 rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

7.212 Of the 31 rooms affected annually, 21 are bedrooms which are less sensitive to sunlight alterations as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. The remaining 19 are LDs, which are located beneath balconies and as such shade the rooms from sunlight, as shown in the no balconies assessment, which highlights that half the number of rooms would be significantly affected, each retaining greater levels of APSH.

7.213 For Winter PSH, 102 of the 118 (86.4%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.214 Of the 16 rooms affected in the winter, two would experience an alteration in Winter PSH between 20-29.9% which is considered a Minor Adverse effect whilst 14 would experience an alteration greater than 40% which is considered a Major Adverse Effect.

7.215 Overall, owing to the number of affected rooms being bedrooms, with shading from balconies contributing the magnitude of reductions, the effect to this building is considered **moderate adverse (significant)**.

Wooton Court – 'minor adverse'

7.216 This building is located east of the Proposed Development and has a perpendicularly adjoining relationship with the previously discussed building, Studley Court. The Site facing façade is defined by a stack of protruding balconies. The majority of room uses within this building could not be verified and as such are all treated as equally sensitive as a worst-case scenario. A total of 70 rooms were assessed for sunlight within this building of which 59 (84.3%) would meet the BRE's criteria for both Annual and Winter PSH.

7.217 For Annual PSH, 59 of the 70 (84.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.218 Of the 11 rooms affected annually, seven would experience an alteration in Annual PSH between 20-29.9% which is considered a Minor Adverse effect whilst four would experience an alteration greater than 40% which is considered a Major Adverse Effect.

7.219 Of the 11 rooms affected for APSH and WPSH, nine are of unknown use, one is a kitchen and one is a bedroom which is less sensitive to sunlight alterations as per BRE Guidelines: Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice, Second Edition, 2011. Three of the unknown use rooms have low existing APSH levels below 8% and therefore the reduction is disproportionate to what the occupant would experience and five retain APSH levels from 29-24%. The kitchen, which is shaded by the building itself in the baseline would see a reduction, retaining 10%.

7.220 For Winter PSH, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.221 Overall, owing to the retained levels of APSH, the effect to this building is considered **minor adverse (not significant)**.

Naval Row – 'negligible impact'

7.222 This building is located to the north of the Site. A total of 32 rooms were assessed for sunlight within this building of which 31 (96.9%) would meet the BRE's criteria for both Annual and Winter PSH.

7.223 For Annual PSH, 31 of the 32 (96.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss between 20-29.9% which is considered a Minor Adverse effect.

7.224 For Winter PSH, 31 of the 32 (96.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss greater than 40% which is considered a Major Adverse effect.

7.225 Overall, owing to the level of BRE compliance, the effect to this building is considered **negligible (not significant)**.

Romney House – 'negligible impact'

7.226 This building is located north of the Site, with the south eastern façade defined by recessed balconies. A total of 15 rooms were assessed for sunlight within this building of which 14 (93.3%) would meet the BRE's criteria for both Annual and Winter PSH

7.227 For Annual PSH, 14 of the 15 (93.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss greater than 40% which is considered a Major Adverse effect.

7.228 For Winter PSH, 14 of the 15 (93.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss greater than 40% which is considered a Major Adverse effect.

7.229 Overall, owing to the level of BRE compliance, the effect to this building is considered **negligible (not significant)**.

Bright Horizons East India Dock Day Nursery – 'negligible impact'

7.230 This educational facility is located east of the Proposed Development on the ground floor of Explorer's Court. A total of three rooms were assessed for sunlight within this building of which 2 (66.7%) would meet the BRE's criteria for both Annual and Winter PSH.

7.231 For Annual PSH, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

7.232 For Winter PSH, two of the three (66.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss between 30-39.9% which is considered a Moderate Adverse effect.

7.233 Overall, owing to the level of BRE compliance, the effect to this building is considered **negligible (not significant)**.

Overshadowing

7.234 In addition to the assessment of daylight and sunlight on adjacent development, overshadowing has been considered at length with regard to a variety of sensitive receptors. This is considered through assessing the Transient Overshadowing (TOS) and Sun Hours on Ground. It is noted that BRE does not provide guidance on criteria for the scale, effect and subsequent significance other than to advise on what times and days of the year should be tested for. The Sun Hours on Ground Figure below illustrates the impacts to John Smith Mews.

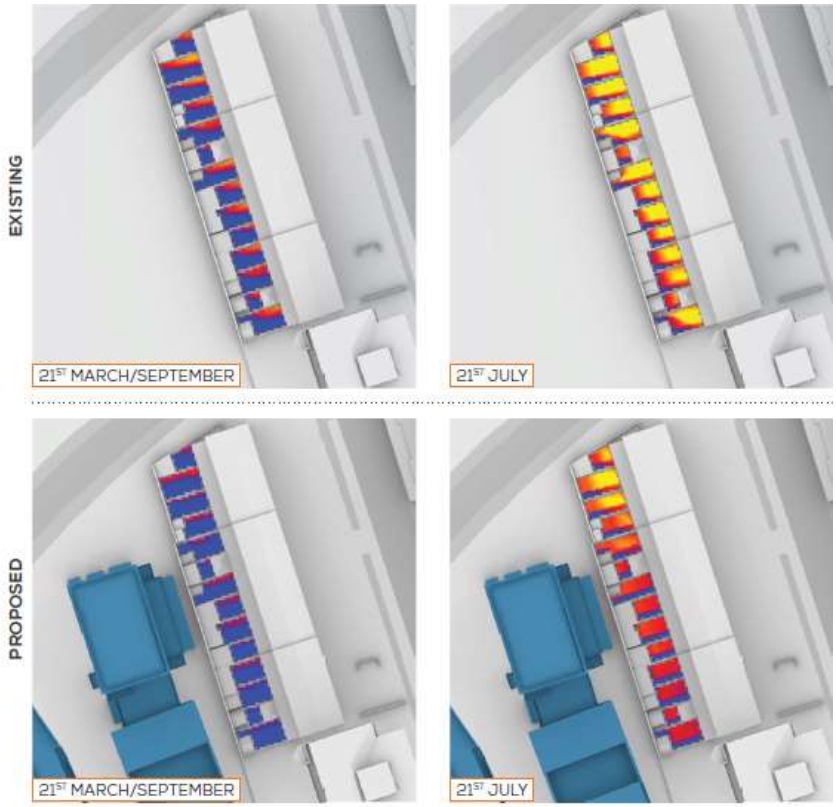


Figure 42: John Smith Mews – Sun Hours on Ground

7.235 BRE guidance recommends using Sun Hours on Ground as a methodology for measuring overshadowing impact. It is suggested in the BRE Guidelines that for an area to appear adequately sunlit throughout the year, at least half (50%) of any assessment area should see direct sunlight for at least two hours on the 21st March. If, as a result of new development, an existing assessment area will not meet BRE Guidelines and the area which can receive two hours of direct sunlight on 21st March is reduced to less than 0.8 times its former area, then the loss of sunlight is likely to be noticeable.

7.236 Where the results show compliance with the BRE Guidelines criteria, the occupants are unlikely to experience any noticeable change to their sunlight amenity levels. For the purposes of this assessment, such an effect would be considered negligible and not significant. Should the relevant criteria not be achieved, a judgement has to be made as to the scale and nature of effects and their resultant significance based on the level of loss, retained sunlight levels and the relevant baseline scenario.

7.237 A total of 27 individual areas have been assessed using sun hours on ground.

7.238 On March 21st, Area 1 (private amenity area associated with Romney House) and Area 2 (private amenity area associated with Pumping House) would experience in excess of two hours on sunlight and are therefore compliant with the BRE sun hours on ground test. As such, they are considered to experience a **negligible impact.**

7.239 Area 3 as designated within the Report shows East India DLR Station Square. On March 21st this area is compliant with the sun hours on ground test and is therefore considered to experience a **negligible impact.**

7.240 Areas 4 to 17 as designated within the Report show the rear gardens associated with properties along John Smith Mews. It should be noted that none of the areas are BRE compliant in the baseline condition, with each of the gardens achieving only 12-36% of their total area seeing two hours of sun on March 21st. Whilst these private gardens would experience reductions on March 21st above BRE recommendations, a supplementary sun exposure assessment showing sunlight availability on 21st March and 21st July has been undertaken, which can be found within the Environment Statement**.** This supplementary assessment carried out on July 21st shows that the majority of areas 8-16 would achieve at least 3 hours on sunlight. Therefore, they are considered to experience a **moderate adverse impact.**

7.241 The supplementary sun exposure assessment furthermore shows that areas 4-7 would retain above 6 hours of sunlight on a significant portion of the garden on July 21st, therefore experiencing a **minor adverse impact.**

7.242 Areas 18 to 26 as designated within the Report show the private gardens associated with Sexton Court. Each of these areas are complaint with the BRE criteria sun hours on ground test. Area 18 is well below the BRE criteria in the baseline, with only 1.5% of the total area seeing at least two hours on sun on March 21st. The remaining areas would experience a very small alteration as a result of the Proposed Development. Therefore, the effect is considered **negligible impact.**

7.243 Area 27 as designated within the Report shows Virginia Quay Park and the playground serving Bright Horizons East India Dock Day Nursery. This area is not affected by the Proposed Development, achieving 100% of the total area seeing at least two hours on sunlight with the Proposed Development in situ.

Summary

7.244 The proposed development would have a range of impacts on adjacent developments, by virtue of both the proximity and scale of the scheme as well as the wholly undeveloped nature of the existing car-park as it presently exists. The impacts range from negligible or non-existent, up to major as registered to properties along John Smith Mews. With respect to receptors which have registered an impact to daylight 12 are considered not significant, with 4 registering significant impacts as defined in the above section. With respect to sunlight, 7 have registered effects considered ‘not significant’ with 3 registering ‘significant’ impacts.

7.245 It is noted that the impacts to all properties have been minimized as much as possible through the development of the scheme through both pre-application and submission, while balancing the constraints of the sites and requirements of the Allocation to which it forms a part.

7.246 In considering the impacts to neighbouring development, the most severe are to properties at John Smith Mews, the gardens of which abut the shared boundary with Blackwall Yard. The impacts to these 14 dwellings would be considered major adverse, with 63 of their 96 windows tested for daylight registering ‘major’ reductions in VSC and 49 of 84 rooms tested for NSL registering similar results. With respect to sunlight, 64 of the 84 windows tested would suffer major reductions in Annual Probable Sunlight Hours, and 48 in Winter Probably Sunlight Hours. It is noted that with respect to overshadowing that none of the existing rear gardens currently benefit from BRE compliant sun on ground time.

7.247 As noted above, the impacts are exacerbated by the existing condition of the site which remains devoid of any development. Notwithstanding this, the impacts on these dwellings and their occupants will be considerable and have a detrimental impact on the amenity enjoyed by the occupants. Mindful of this, it is considered essential that the impacts be given the greatest consideration within the scope of the application and the public benefits derived therewithin. Notably, the predominant levels of public support for the scheme have been received from occupants of these dwellings who welcome the redevelopment of the site and associated public benefits; however while this support is welcome the impacts have been considered in isolation of this support and mindful of potential future occupiers as well as the existing.

7.248 In considering these impacts, it is noted that the most significantly impacted areas are the 20 windows which serve 14 living rooms along the rear of these dwellings facing onto the site. Of these 20, 5 would retain between 16.3-22.4% VSC which, while below BRE guidance, would still represent a good standard of light. The remaining 9 would have less than this, and would be acutely impacted. It is noted that given the nature of these windows, and the undeveloped nature of the site, even a considerably lower massing of development would still have an adverse impact on their benefit to light.

7.249 The proximity of Plot 2 and the primary school on the site are responsible for much of the detrimental impact. These Plots were specifically designed to be the most low-rise within the development as part-5 and 9 storey blocks. The school in particular was seen as being a suitable interface given its lower profile, and best endeavours have been made to configure the site around these sensitive receptors. Notwithstanding these efforts, it is acknowledged that the harm remains major to these 9 windows in particular.

7.250 As such, while the harm is considered as major to these properties, it is viewed that the significant public benefits associated with the school – as detailed within this report – outweigh the harm to these buildings. Given the considerable constraints on site with respect to configuring a viable development on site which accommodates 35% affordable housing, a primary school and enhanced heritage asset, it is viewed that the applicant has minimized this harm to the best of their ability while still delivering on the broader public benefits. It is noted that many of these benefits including new local shops, community hub, school, and public open space will be enjoyed by occupants of these blocks.

7.251 It is noted that there remains moderate adverse impacts to Longitude House, Studley Court, and Wingfield Court. These results have not been discounted within the assessment, and have been carefully considered as with those impacts to John Smith Mews. For many of the impacts windows and rooms, the very high existing values – particularly with respect to NSL and VSC – have resulted in significant reductions in daylight and sunlight. It is noted, however, that for many of these windows and rooms they retain fairly good values which would be commensurate with urban areas such as London.

Noise, air quality and wind/microclimate

7.252 These topics are discussed in detail under Housing above. In summary, subject to the recommended conditions, no adverse long-term noise, air quality or wind/microclimate effects for existing neighbouring residents or businesses are identified.

Construction Impacts

7.253 The Council's Code of Construction Practice Guidance require major developments to operate a Construction Environmental Management Plan (CEMP) that outlines how environmental, traffic and amenity impacts attributed to construction traffic will be minimised.

7.254 The application is supported by an Outline Construction Environmental Management Plan. The Outline CEMP notes of an overall timeframe for construction of approximately 60 months, with an overall hierarchy for pashing provided. It is noted that this CEMP is Outline in nature, and particularly high level and at some points somewhat out of date with respect to timeframe, however given the outline nature this is not considered as a concern for LBTH officers.

7.255 The ES assumes that several measures are in place to manage potential environmental effects associated with demolition and construction (including a CEMP). It is therefore recommended that planning conditions secure the implementation of an approved detailed CEMP and Construction Management Plan and that a planning obligation secures compliance with the Considerate Contractor Scheme.

Transport

7.256 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.

7.257 As described under Site and Surroundings, the site currently has a PTAL rating of between 2-4 given its size, with the highest PTAL being at the entrance to the site from Blackwall Way. Overall it is well connected with surrounding services, and is immediately adjacent East India DLR station. The future anticipated PTAL, with the Elizabeth Line in service, rises to 5 at the eastern fringe of the site.

7.258 The proposal has been developed with sustainable transport as a primary goal, with the removal of all existing private car-parking on site considered a significant benefit. Furthermore, the applicant has sought to implement a number of innovative sustainable transport solutions within the transport strategy on site including shared bikes and e-scooters, e-cargo bike hire (for moving heavy goods), leased bikes, secure cycle parking, cycle repair shop, and electric vehicle hire hub.

7.259 The strategy has been developed in collaboration and consultation with LBTH Highways and TFL officers.

<u>Vehicular, pedestrian and cycle access</u>

7.260 The primary ingress to the site is from Blackwall Yard, with vehicle movements exclusively entering from this point. The predominantly movement of people into the site will be from East India DLR Station, however the opening of the site will encourage movement from the east of the site along the River Thames. A new pedestrian crossing is proposed across Blackwall Way which will make crossing from the northern footway safer for pedestrians. Cycling access is similarly encouraged through the site in this fashion, with the closest Cycle Superhighway immediately north of Aspen Way through East India Docks.

7.261 Vehicle movements will be solely related to servicing, e-car club hire and accessible parking which is located within Plot 1. The majority of these movements are anticipated to occur from the north-western corner of the site from Blackwall Way, where accessible to the internal servicing areas of Plo1 is gained. A secondary vehicle access point for emergency vehicles only will be via The Lane, between Plots 1 and 2 accessed from Blackwall Way. A taxi drop-off point has been provided for safely at the north-western corner of the development.

7.262 A comprehensive cycle parking strategy is included, which provides for cycle parking within each plot, as well as a significant amount within Plot 1. Primary cycling desire lines will be from Blackwall Way, with some demand anticipated from along the Thames Path.

7.263 Importantly, the scheme proposes to open up the Thames Path at the eastern end of the site. The Thames Path represents a comprehensive public right of way along the River Thames, and extends through a series of developments along the Borough. Access is currently restricted at the western extents of the site, beyond the red line boundary, which remains in the ownership of Telehouse South. It is understood the applicant is pursuing a separate commercial agreement to have these opened, so that full access along the Thames Path is provided for; however it does not form part of this planning application.

7.264 The opening of the Thames Path is considered a significant public benefit, and will increase pedestrian permeability and riverside access within Blackwall. Access to the Path will be secured by way of S106 obligation and will be secured prior to first occupation.

<u>Car Parking</u>

7.265 London Plan Policy T6.1 requires residential developments with PTAL 4-6 to be car-free. The policy requires the provision of disabled persons parking for new residential developments ensuring 3% provision from the outset with additional 7% to be provided upon request. The policy also states that new residential car parking spaces should provide at 20% of active charging facilities with passive provision for all remaining spaces.

7.266 Tower Hamlets Local Plan policy D.TR3 requires all residential developments to be permit free and that all parking associated with the development should be provided off-street.

7.267 As existing, the site accommodates a 287 private car-parking spaces for employees of the adjacent Telehouse South Data Centre. It is proposed that all these private spaces be removed, and the scheme be car-free with the exception of 45 accessible bays within Plot 1, and 3 electric vehicles associated with the e-hub car hire service. The car-free nature of the development remains in line with the policy ambitions of the Council, and is welcomed by LBTH Highways officers.

7.268 It is noted that the accessible bays will be accommodate through a car-stacking system, optimising the floorspace within the development and representing an innovative solution to providing 5% disabled parking at the onset. The car-stacking system is able to accommodate wheelchair users, while also providing electric vehicle charging and is supported by LBTH Highways officers while recognising that it represents a first within the Borough. LBTH Highways officers also support the applicant's initiative to include an electric vehicle car-hire club to discourage residents using traditional private vehicles. It is noted that this electric vehicle car-club would represent a first in the Borough.

7.269 Above and beyond the London Plan policy, all of the proposed spaces would have Electric Vehicle Charging Points (EVCPs) through the proposed car-stacking system. The proposed e-car hire would also utilised EVCPs, making the development capable for wholly electric vehicle use if needed.

7.270 The proposed car parking arrangements are acceptable subject to the recommended conditions and s106 planning obligations. Given the car-free nature of the proposed scheme, it is recommended that planning obligations remove the right of future residents to obtain a permit to park in the CPZ ('Blue Badge' holders excluded).

Cycle Parking and Facilities

7.271 London Plan Policy T5 requires development provide for long-term cycle parking spaces for all uses across the site, inclusive of residential, commercial and primary school. The proposed scheme would provide a total of 1,594 as detailed in the below table. 48 of these spaces (3%) would be for large bikes. TFL officers acknowledge that this provision would meet contemporary London Plan requirements, and LBTH Highways Officers welcome the overprovision against Borough requirements. The proposed commercial units would be provided with 18 short-term Sheffield stands in the public realm at the end of Arrow Road and Bromley High Street.

Long stay cycle parking - residential only

	2-tier	Sheffield	Large cycles	Total
Plot 1	866	130	23	**1019**
Plot 2	50	0	2	**52**
Plot 3	150	4	6	**160**
Plot 4	342	4	17	**363**
Total	**1408**	**138**	**48**	**1594**
%	**88%**	**9%**	**3%**	

7.272 Cycle parking is provided by way of secure storage as well as resident hire and rental locations across the stie to encourage as much as possible, sustainable transport by residents. 98 short-stay spaces will be provided in various locations on site with a further 26 short term parking bays are proposed to be included adjacent East India DLR station to accommodate the anticipated higher use associated with the development. These bays and their location will be secured by way of condition on consent.

Deliveries & Servicing

7.273 An innovative Envac (vacuum) system is proposed for the development which is capable of sending all waste (both from within each building and from standalone litter bins within the site) to a central point for collection from Plot 1 (the north western building). Refuse vehicles will park at the delivery and servicing bays and collect waste from the adjacent Envac container room.

7.274 A site waste Operational Waste Strategy report provides swept path diagrams for these vehicle movements on site. It is noted that LBTH Waste officers are supportive of the system, and requests for clarification on food waste streams was provided to their satisfaction during the application. A final waste strategy will be conditioned on consent.

Trip generation

7.275 A revised Transport Note prepared by Robert West following TFL comments estimates that the proposed development would be likely to generate a net additional 857 arrivals and 966 departures in the AM peak with 539 arrivals and 379 departures within the PM peak. The majority of these trips are by sustainable transport means (walking and cycling), with the remainder dominated by bus, DLR and tube. Given the car-free nature of the site, private vehicle transport has dropped dramatically with only 29 car driver trips expected a day.

7.276 Overall the trip generation has been prepared to the satisfaction of TFL and LBTH Highways officers and reflects the sustainable transport objectives of the scheme.

Travel Planning

7.277 The submitted Framework Travel Plan identifies measures to encourage sustainable travel and it is recommended that he approval and implementation of detailed Travel Plans is secured by planning obligation.

Highway works

7.278 Extensive highways works are proposed to the public highway associated with Blackwall Yard. These works have been developed in close consultation with LBTH Highways officers and Transport for London, who operate a bus service along this route. At present Blackwall Yard is a hostile environment for pedestrians, and immediate abuts Aspen Way to the North which is an even more unfriendly environment.

7.279 The scope of highways works proposed include the following:

- Provide a mini roundabout at the current access to Thomson Reuters to improve turning facilities and avoid three point turn turns at the bus gate;
- Improve the tie in to the cycle path along Aspen Way at both East India Station as well as by Thomson Reuters;
- Remove parking west of the existing bus gate;
- Remove a section of the northern footway; and
- Ban all vehicles other than buses and cycles between the development access and

7.280 Proposals along Blackwall Way build upon the existing low traffic environment and bring forward TfL's Healthy Streets concept that prioritises the movement of people walking and cycling as well as providing additional opportunities for play. Improvements to Blackwall Way are focused on enhancing the landscape and reducing vehicles. The existing bus gate which restricts the movement of through traffic will expand with existing on-street parking removed to give more space to people walking and cycling. New planting, wider footpaths, active shop

frontages, dwell spaces and onstreet cycle parking will be provided within the landscape. A new public space will be created between the DLR station and the Site, set within mature trees and low level planting.

7.281 This forms part of the wider landscape approach for greening along Blackwall Way which will also deliver opportunities for solar shading and acoustic mitigation with informal play spaces along the route.

7.282 These works would be in parallel with broader enhancement works to the public realm associated with Blackwall Way to create a welcoming environment that is safe for residents, students, and the community. The works will be secured by way of S278 agreement, and are strongly supported by LBTH Highways officers who welcome the improvements.

Environment, Health and Sustainability

Environmental Impact Assessment

7.283 The planning application represents Environmental Impact Assessment (EIA) EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES) co-ordinated by Trium.

7.284 Regulation 3 prohibits the council from granting planning permission without consideration of the '*environmental information'* that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the development.

7.285 The Council issued an EIA Scoping Opinion (PA/19/02559) on 27/01/2020. The submitted Environmental Statement (ES) accords with this Opinion and assesses the environmental impacts of the development under the following topics:

- Socio Economics, Health and Wellbeing;
- Highways and Transport;
- Noise and Vibration;
- Air Quality;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing and Solar Glare;
- Archaeology;
- Built Heritage;
- Water Resources, Drainage and Flood Risk;
- Townscape and Visual;
- Greenhouse Gas Emissions; and
- Aquatic Ecology and Biodiversity

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

7.287 The application has been supported by an ES and Non-Technical Summary (NTS) (Novemeber 2020), an ES Interim Review Report Response (April 2021), an ES Final Review Report Response (May 2021), and an Air Quality Technical Note (June 2021). None of the additional ES information was considered to be 'further information' under Regulation 25.

7.288 The Council appointed Temple Group to independently examine the ES, to prepare an Interim Review Report (IRR) and to confirm whether the ES satisfies the Regulations. This is supported by reviews by the authority's internal environmental specialists. The IRR dated 17 March 2021 identified clarifications and potential '*further information'* required under Regulation 25.

Clarifications were sought across a broad range of topic, with potential Reg 25 *'further information'* identified within the following topics:

- Archaeology;
- Built Heritage;

- Socio Economics, Health and Wellbeing;
- Transport;
- Air Quality;
- Noise & Vibration;
- Daylight, Sunlight and Overshadowing
- Aquatic Ecology;
- Microclimate;
- Greenhouse Gases; and
- Townscape & Visual Impact

7.289 In response to the IRR, the applicant submitted an Interim Review Response document dated 20 April 2021. On 6 May 2021, Temple issued a Final Review Report (FRR) that took account of the applicant's document and identified the outstanding clarifications and potential '*further information'* required under Regulation 25.

The vast majority of potential Reg 25 points, and clarifications, were considered acceptable; however the remaining topics remained outstanding and further information sought from the applicant:

- Transport;
- Air Quality;
- Noise & Vibration; and
- Townscape & Visual Impact

7.290 A further FRR response was submitted by the applicant on 21 May 2021 in response, which sought to address the remaining outstanding issues. This response issue was accompanied by a meeting with LBTH officers and the applicant team to discuss the outstanding topics of Transport, Air Quality, Noise & Vibration and Townscape.

7.291 On 22 June 2021, the applicant submitted an updated Air Quality Note in support of the existing Air Quality Assessment appended to the Environment Statement (as detailed within the Air Quality section of this report). This information was considered to satisfy the remaining outstanding points within the application and the Environment Statement for the application was considered adequate, subject to the securing of any identified mitigations and conditions within the consent.

7.292 The Council's EIA Officer and the Councils Appointed EIA Consultants have confirmed that the submitted ES (including the subsequent ES submission as set out above) meets the requirements of the EIA Regulations.

7.293 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.

7.294 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.

Health Impact Assessment

7.295 Local Plan Policy D.SG3 states that developments that are referable to the Mayor require to be supported by a Health Impact Assessments (HIA). A detailed HIA, given the scale of the application has been required and submitted.

7.296 The submitted HIA seeks to identify those health effects arising from a development (whether during the construction or the operational phases) which are likely to be significant. This assessment is done through consideration of prevailing health outcomes and sensitivities, informed by a detailed baseline of the existing health conditions and vulnerable groups in identified study areas and by consultation with relevant stakeholders and officers. The assessment also includes a review of medical and social-scientific literature in order to identify

connections between the built environment and health outcomes. This results in a thorough assessment of the likely health effects of the Proposed Development.

7.297 The HIA identifies construction phase and operational phase benefits, and provides recommendations for mitigation of any disbenefits associated with the development. Observed benefits include moderate benefit associated with higher education attainment associated with the school, moderate benefits to health through improvements to accessibility and sustainable transport, and a major benefit associated with provision of high quality homes. No construction phase benefits are anticipated.

7.298 With respect to construction phase mitigation, the HIA recommends use of traffic marshals and construction management, opportunities for meanwhile use or improvements of the construction hoarding. It is noted that a CEMP will be conditioned to mitigate against the first aspect, while a meanwhile garden on site has been erected for benefit of neighbouring properties.

7.299 Operational phase mitigation includes organising community events to mitigate against crime, secured management of open spaces, and access to the allotments being as widespread as possible. These aspects will be secured by way of planning conditions relating to landscaping, Secure by Design and S106 management obligations.

7.300 It is noted that LBTH Public Health officers raised initial concerns with respect to the presentation of open space and play space within the HIA, mindful of the over age play deficit within the scheme. HIA Officers encouraged the HIA to be updated with recommendations relating to this. It is noted that an off-site play contribution will be secured within the S106 and will serve to mitigation against the impacts identified within the ES and associated HIA. Subsequent to revisions in line with HIA Officer comments, it was considered that the HIA was satisfactory subject to the securing of improvements to open and play space within and outside the scheme.

Energy & Environmental Sustainability

7.301 Local Plan Policy D.ES7 requires developments (2019-2031) to achieve the following improvements on the 2013 Building Regulations for both residential and non-residential uses: Zero carbon (to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site and the remaining regulated carbon dioxide emissions to 100% - to be off-set through a cash in lieu contribution).

7.302 Local Plan Policy D.ES10 requires new development to ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal air conditioning systems.

7.303 London Plan Policy SI 2 also calls for major development to be zero-carbon by reducing greenhouse gas emissions by improvements on the 2013 Building Regulations, but by 35% (with at least 10% for residential and 15% for non-residential coming from energy efficiency measures), in accordance with the Mayor of London's energy hierarchy. This policy also calls for developments referable to the Mayor to include a Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

7.304 London Plan Policy SI 3 requires development within Heat Network Priority Areas to have communal-low temperature heating system, with heat source being selected in accordance with a hierarchy (connect to heat networks, use zero carbon or local heat sources (in conjunction with heat pumps, if required), use low-emission CHP.

7.305 London Plan Policy SI 4 calls for development to minimise overheating in accordance with a cooling hierarchy.

7.306 The principal target is to achieve a reduction in regulated CO2 emissions in line with the LBTH Local Plan that requires all residential development to achieve the 'Zero Carbon' standard with a minimum 45% CO2 emission improvement over Part L 2013 Building Regulations. This exceeds Policy 5.2 of the London Plan that requires the 'lean', 'clean' and 'green' stages of

the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%. All surplus regulated CO2 emissions must be offset at a rate of £95 for every ton of CO2 emitted per year over a minimum period of 30 years.

7.307 The application is supported by an Energy Assessment, Sustainability and the ES (Chapter 6) reports on an assessment of the likely significant effects on greenhouse gas emissions. It is noted within the ES that there will be major adverse likely significant effects with respect to Greenhouse Gases during the construction and operation phase.

Energy

7.308 The Mayor of London's Energy Hierarchy is as follows:

- be lean: use less energy and manage demand during operation;
- be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;
- be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and
- be seen: monitor, verify and report on energy performance.

7.309 *'Be Lean.'* The Mayor's hierarchy prioritises a 'fabric first' approach, including high performance glazing, reduced air permeability and good insulating fabric, together with active and passive measures such as use of high-efficiency LED lighting, Mechanical Ventilation and Heat Recovery (MVHR) and smart meters to reduce energy demand. These proposed measures are expected to save 124.5 tonnes of carbon dioxide per year for domestic and 9.9 tonnes of carbon dioxide per year for non-domestic (a 15 % and 12% saving above SAP 10).

7.310 *'Be Clean.'* There is no viable existing District Heat Network (DHN) nearby, although a speculative proposed heat network is in close proximity to the site. In order to ensure the a functioning system at first occupation and on-site heat system has been designed, however, the proposed on-site communal heat network is to be designed so that it could connect to an offsite DFN. The proposed energy source is relatively warm air, by absorbing heat from the air at a low temperature into a fluid which passes through a compressor where its temperature is increased and transfers its higher temperature heat to the heating and hot water system. This uses Air Source Heat Pumps (ASHPs), which is treated as a renewable energy technology which is discussed below.

7.311 *'Be Green.'* The proposed ASHPs would be located on the western facades of the towers on Plot 1 and Photovoltaic (PV) arrays are on the roof of Plot 2. On-site renewable energy technology is expected to save 551.5 tonnes of carbon dioxide per year (a 23% saving above SAP 10).

7.312 *'Be Seen.'* A proposed electricity, water and heat monitoring systems through a display devices in each home would allow residents to monitor and reduce their energy use.

7.313 *Carbon Offsetting*. The above measures are expected to save approx. 344.5 tonnes of carbon dioxide per year (a 38% saving above the Building Regulations 2013). It is noted that this falls short of the minimum required to reduce on-site carbon by 45%, and the policy target overall of zero-carbon. The applicant has been encouraged to seek further reductions within the scheme, however if not possible it is recommended that planning obligations secure the payment of a cash-in-lieu payment of £1,571,775 (based on £95 per tonne of carbon over a 30-year period) be secured through the S106.

7.314 *Overheating*. The overheating assessment that is included in the submitted Energy Assessment demonstrates that the proposed orientation and design of the proposed homes (when coupled operable windows, daytime and 20% opening night purge, G-value 0.3 and external shading) means that 98% compliance with CIBSE TM59 overheating criteria is achieved.

7.315 *Likely significant Carbon Greenhouse Gas environmental effects*. The ES (Chapter 16) identifies a number of proposed mitigation measures for the construction and operational phases. These are discussed in more detail in other sections of this report and it is

recommended that they are secured by way of planning conditions and obligations. It is noted within the ES that there will be major adverse likely significant effects with respect to Greenhouse Gases during the construction and operation phase.

Environmental sustainability

7.316 Policy D.ES6 requires new residential development achieve a maximum water use of 105 litres per person per day, to minimise the pressure on the combined sewer network and to demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development, taking into consideration the cumulative impact of current and proposed development.

7.317 Local Plan Policy D.ES7 requires development to maximise energy efficiency based on the following relevant standards: BREEAM 'excellent' rating and the Home Quality Mark.

7.318 Movement and transport, Landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

7.319 *Building Performance*. The Sustainability Statement includes a BREEAM pre-planning assessment (BREEAM New Construction 2018) which demonstrates that the scheme has been designed to achieve an 'excellent' rating. This will be conditioned for delivery.

7.320 *Construction waste.* The applicant's Sustainability Statement states that it would put in place waste management systems during the (demolition) and construction phase to minimise waste, including the sorting and recycling of waste and diverting it from landfill. The ES recommends the implementation of an approved Site Waste Management Plan and It is recommended that this is secured by planning condition. Other construction phase mitigation measures, inclusive of sustainable materials, façade studies, cement replacement, and stage 2 post-construction sequential assessments, are identified within the ES. The demonstration of commitment to these mitigation measures should be secured by way of condition to condition.

7.321 *Considerate Constructors Scheme*. The applicant's Sustainability Statement states the site is to be registered under the Considerate Constructors Scheme prior to the commencement of the construction phase, with a set target to help achieve BREEAM 'Excellent.' It is recommended that this is secured by a s106 planning obligation.

Waste

Operational waste and recycling

7.322 The application is supported by an Operational Waste Strategy which outlines the management of waste streams on site, and their management. The refuse strategy implements an extremely efficient site wide vacuum system operated by Envac. Waste is placed within waste chutes that are located within each building on every residential floor and convenient locations for the school and commercial units. This is transported pneumatically at high speed through the pipes to the remote 'waste terminal' using the system's transport pipes.

7.323 The Envac waste system is managed through Plot 1, where all waste and refuse collection vehicles will operate. A series of Envac chutes within each Plot will transport refuse within a vacuum to Plot 1 for collection.

7.324 LBTH Waste Officers are supportive of this system, following clarifications related to food waste streams.

Construction waste and recycling

7.325 As discussed under Environmental Sustainability above, it is recommended that a Site Waste Management Plan and It is recommended that this is secured by planning condition.

Biodiversity

7.326 London Plan Policy G6 states that 'development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain' and Tower Hamlets Local Plan Policy D.ES3 require developments to protect and enhance biodiversity. The site does not form part of any statutory or non-statutory nature conservation site and is not located within a preferred location for biodiversity under the Local Plan's Green Grid Network.

7.327 The application is supported by an Aquatic Biodiversity Impact Assessment & Strategy, Arboricultural Impact Assessment, Biodiversity Impacts Assessment, Preliminary ecological Appraisal and Terrestrial Invertebrate Study. Within the PEA it is noted that the Tsite was identified as having potential to support the following protected species:

- Moderate potential to support foraging and commuting bats;
- High potential to support nesting birds;
- High potential to support notable invertebrates;
- Confirmed presence of invasive/non-native species (although no Schedule 9
- species); and
- High potential to support BAP priority fish species.

7.328 The site at present is dominated by hard-standing, with two areas of overgrown vegetation as well as the silted water of the Graving Dock on site. The development would provide for a series of terrestrial biodiversity enhancements including four types of green roof. Three of them (biodiverse, bio-solar, and open mosaic habitat roof) are identified by LBTH Biodiversity Officers as contributing towards the Councils LBAP targets. The remaining proposed sedum roof would provide limited biodiversity value and wouldn't contribute to LBAP target unless wildflower blankets were used instead, which the applicant will be encouraged to explore through condition discharge.

7.329 The proposed development would also include a revegetation of parks of the site, including Meridian Gardens which would include a small-scale orchard. A meadow area is also provided to the northern edge of the site which the Biodiversity Officer notes would be larger than that of the existing vegetation on site. They have advised that tree plantings at this area should be limited but given the importance of tree-planting within this area for wind and acoustic mitigation, it is likely these would need to be retained.

7.330 Further biodiversity enhancements are also secured through the replacement of the existing concrete slab within the Graving Dock with biodiversity rich landscaping, which introduces part of the overall 150 new trees on site. Additionally, an artificial reef measuring 50m in width is proposed to be introduced to the river wall on site. The final details of this will be secured by way of condition, to be agreed in consultation with LBTH Biodiversity Officers and the Environment Agency.

7.331 The Officer also notes that the proposed water area within the enhanced Graving Dock would have the potential to support biodiverse life, and should be explored as part of any future biodiversity enhancement strategy. Further to this, a 50m artificial intertidal vertical reef is proposed along the river wall to enhance aquatic biodiversity. The Environment Agency have raised some concerns with this, and as such the aquatic biodiversity enhancements will be conditioned on consent.

7.332 On balance the Council's Biodiversity Officer has no objection to the proposed works and recommends that all biodiversity mitigation and enhancements be subject to a condition which will be secured on consent.

Flood Risk & Drainage

7.333 Tower Hamlets Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drain is protected to a very high standards by the Thames tidal flood defences up to a 1 in 1000 (0.1%) change in any given year. Policy D.ES6 requires new development to minimise the pressure on the combined sewer network.

7.334 The application is supported by a Flood Risk Assessment (FRA) and Drainage Strategy. The FRA identifies the site as being in Flood Zone 3 (high risk) and concludes that all the proposed uses are appropriate subject to the implementation of the proposed works and recommendations. The sites primary flooding risk relates to the River Thames to which is

abuts, and Is primary tidal; however it is noted within the FRA that the overall risk of fluvial and tidal flood is low at present. A residual risk remains with respect to the breach of flood defences, and as such risk remains that the lower portion of the site could become flooded. As a result it is proposed that all More Vulnerable uses be raised to at least the 6.2m AOD TE2100 flood defence level while recognising the overall risk of a breach is very low.

7.335 The proposed redevelopment of the site will increase levels across the site, from the current range of 5.2m – 5.8mAOD, to 6.2mAOD. No basement level proposed as part of the development. The proposed development includes providing a new set-back flood wall that raises the flood defence level to 6.2mAOD, which is the level required by the year 2100 under the EA's Thames Estuary 2100 (TE2100) Plan.

7.336 In order to achieve the flood protection level of +6.2m, most of the site has been elevated and a flood defence line has been introduced parallel to the river wall in front of Plot 3 & 4 and around the dock. A mass concrete retaining wall has been introduced along the flood defence line and integrated within the landscape. The new 6.2mAOD flood defence wall will be a mass concrete structure with a maximum height of 1m. All buildings will be on piled foundations, and flood wall will be structurally independent on the buildings.

7.337 The outline Surface Water Drainage Strategy proposes discharge to the River Thames. Attenuation is deemed as not required on site due to proximity and possibility of draining straight to the River Thames. In the proposed scheme, all surface water will discharge to the River Thames and re-use either of the existing two outfalls. The proposed surface water discharge rate for 1 in 100year storm + 40% climate change has estimated at 487.5 l/s.

7.338 A number of SUDS interventions are proposed, namely through porous surfaces within Meridian Gardens and through rain gardens within the public open space in the Graving Dock and along the public realm at Blackwall Way. At this stage the consideration of 'blue roofs' within the development has been constrained by rooftop communal areas and detailed design yet to be completed with respect to depths required on Plot 1. As such, no blue roofs are proposed.

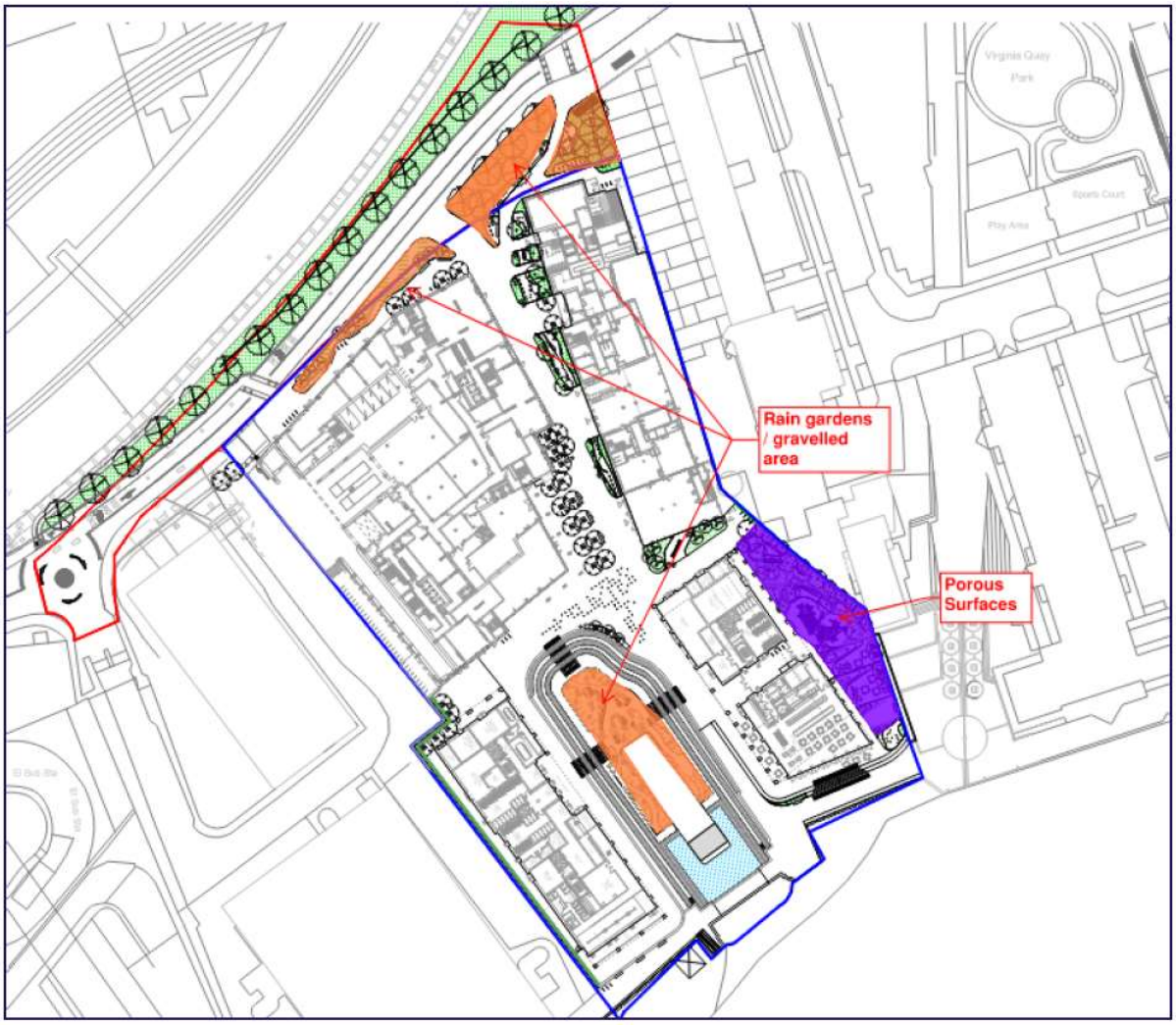


Figure 43: Proposed SUDS Interventions

7.339 The Environment Agency in their original consultation raised object to the scheme, citing concerns with respect to the stepped nature of the landscaping which may inhibit access for maintenance purposes to the flood defenses. The FRA was considered to fail in demonstrated tracked access from the entrance of the site to the existing flood defense line. They also observe that the proposed buildings are within 16m of the flood defenses and located above the flood defense anchor ties. It's proposed within the FRA to replace some of the tie rods with stronger anchors to ensure structural integrity is maintained; however this has not been demonstrated.

7.340 A further technical note prepared by Buro Happold dated 25 February served to address all concerns raised by the EA. The note expanded and clarified on a number of structural aspects relating to the existing and proposed flood defenses, as well as providing swept path diagrams for maintenance access to the defense lines. Correspondence from the EA dated 26 March 2021 confirmed the withdrawal of their objection, and recommended two conditions and an informative which will be placed on consent.

7.341 LBTH SUDS Officers also raised concerns within their original consultation. Primary concerns were raised with respect to details within the Drainage Strategy and ambitions to discharge water to the Thames as well as flood risk, and overall SUDS strategy. These concerns were resolved satisfactorily upon the submission of a further explanatory note prepared by Buro Happold dated 25 March 2021. It was noted that rain water harvesting was not suitable for the sites location, and that all flood defense levels were being met across the site. The discharge to the River Thames was also viewed as being acceptable and in line with policy and statutory guidance.

7.342 To minimise water use on site, a number of water reduction measures are included within the proposal including low flow/flush fittings, efficient water supply (leak detection, smart meters, etc.) and grey water harvesting. In addition to the measures outlined in this section, a Flood Warning and Evacuation Plan (FWEP) will be required during detailed design to manage the residual risk of flooding posed to less vulnerable people at lower levels of the development (e.g. commercial users) in the event of flood event or breach to the existing defenses. The plan will be required to consider closure of parts of the site during such an event, evacuation of vulnerable persons, and a methodology to establish how the flood levels are monitored and what/ when actions are taken on Site.

Land Contamination

7.343 Geo-environmental (Ground Conditions, Groundwater and Land Take and Soils) was scoped out for EIA purposes. However, the application is supported by Preliminary Geotechnical and Land Contamination Report. The purpose of this Preliminary Geotechnical and Land Contamination Report is to support the planning application associated with the site and summarises the site history and conditions, describes the relevant ground investigations, presents an interpretation of the ground and groundwater conditions including an overview of the contaminated land aspects and discusses the results of geotechnical analysis and calculations.

7.344 In preparing this document it is evident that further detailed analyses of all the available data could provide more detailed design information but this will require additional work. This Report takes account of all the available historical information together with draft data from information ground investigation work carried out by BWB. The recent data are presented as a draft report at time of writing. Accordingly, the findings and conclusions presented in this report may be subject to some slight amendment upon receipt of the final report.

7.345 LBTH Land Contamination Officers are satisfied with the information provided at this stage, and request standard conditions be applied to the consent.

Noise & vibration, air quality and wind/microclimate

7.346 These topics are discussed in detail under Housing (Quality of Residential Accommodation) and Neighbour Amenity above. In summary, subject to the recommended conditions, no unacceptable adverse construction-related or long-term noise, air quality or wind/microclimate effects for future residents or existing neighbouring residents or businesses were identified.

Infrastructure Impact

7.347 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £16,799,112.22 (inclusive of social housing relief and infrastructure delivery related CIL relief) and £3,915,834.79 (post-relief) of Mayoral CIL. The Tower Hamlets CIL would contribute towards strategic infrastructure requirements to mitigate the impacts of development.

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

7.349 The applicant has agreed to meet all the financial contributions that are sought by the Council's Planning Obligations SPD (2021), as follows:

- £357,919.20 towards construction phase employment skills training
- £9 918.90 towards end-user phase employment skills training
- ££1,571,775 towards carbon-offsetting

Local Finance Considerations

7.350 Assuming that the Council delivers its annual housing target of 3,931 units, the Council would be liable for a New Homes Bonus payment of approximately £3,811,799 per year for 2021/22 and 2022/23. Due to the introduction of a new threshold approach by the Government it is not

possible to provide an exact amount of New Homes Bonus the proposed development would deliver.

Human Rights & Equalities

7.351 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.

7.352 The proposed new residential accommodation would meet inclusive design standards and 27 of the new homes would be wheelchair accessible, 8 within the affordable rented tenure and 4 within the intermediate sector (with the affordable rented homes to be built to 'fit out' standard). This would benefit future residents, including disabled people, elderly people and parents/carers with children.

7.353 The proposed affordable housing would be of particular benefit to groups that are socially/economically disadvantaged.

7.354 The application has undergone the appropriate level of consultation with the public and Council consultees. The applicant has also carried out an extensive engagement with the exiting residents on site.

7.355 The proposed development would not result in adverse impacts upon human rights, equality or social cohesion.

8. RECOMMENDATION

8.1 That subject to any direction by the Mayor of London, **conditional planning permission is GRANTED** subject to the prior completion of a legal agreement to secure the following planning obligations:

8.2 **Financial obligations**

a. £357,919.20 towards construction phase employment skills training
b. £9,918.90 towards end-user phase employment skills training
c. £100,000 towards off-site play space enhancements
d. £38,250 (collected £7,650 per annum for 5 years) for associated maintenance of new or enhanced off-site play space
e. £1,571,775

Total financial contributions: **£2,074,863.10** (excl. monitoring fees)

8.3 **Non-financial obligations**:

a. Affordable housing (35%% by habitable room)
   - 171 units of Social Rented Housing (rent levels controlled as below)
   - 92 units as Shared Ownership Intermediate Housing (income thresholds restriction)
   - Early Stage Review
   - London Affordable Rent levels & SO Income cap
   - Council nomination rights
   - Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to Building Regulations M4 (3)(2)(b) standard)
b. Securing of the school
   - Determination of need
   - Timeframes for bidding/delivery
   - Alternative community/education use provision
c. Access to employment
   - 20% local procurement
   - 20% local labour in construction
   - Construction phase apprenticeships
   - End-user phase apprenticeships
d. Transport matters:
   - Car Free development (residential)

- Residential and Workspace Travel Plans & monitoring.
- S278/s38 Agreement (works to Blackwall Way inclusion of mini roundabout and footway works)

e. Amended Telehouse South flue configuration prior to occupation (air quality)
f. Ongoing filtration of the NOx filtration systems (air quality)
g. Public access to the proposed open space at Meridian Gardens, Graving Dock and Blackwall Way
h. Public access in perpetuity along the Thames Path (as controlled within the application site)
i. Submission of energy monitoring results to GLA (in accordance with Mayor of London's draft guidance).
j. Compliance with Considerate Constructors Scheme

8.4 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Place is delegated power to refuse planning permission.

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

8.6 **Planning Conditions**

Compliance

1. Phasing strategy
2. 3 years deadline for commencement of development.
3. Development in accordance with approved plans.
4. Removal of existing or future permitted development rights to change the use of the approved commercial units to housing.
5. All homes to be built to Building Regulation Part M4(2) standard ('accessible and adaptable'), with 90 homes to be built to Building Regulation Part M4(3)(a) standard ('wheelchair user dwellings' - adaptable)
6. Inclusive access compliance (lift access prior to occupation of Part M4 flats
7. Restrictions on demolition and construction activities:
    a. All works in accordance with Tower Hamlets Code of Construction Practice;
    b. Standard hours of construction and demolition;
    c. Air quality standards for construction machinery;
    d. Ground-borne vibration limits; and
    e. Noise pollution limits.
8. Mechanical plant noise limits (such that 1 m from the worst affected windows of the nearby noise sensitive premises do not exceed LAeq 37 dB during the daytime and LAeq 30 dB during the night. Plant noise limits of 10 dB below the lowest background noise level (as relied upon in the ES)
9. Noise – glazing specification as detailed within Annex 6 of the approved Environment Statement
10. Implementation of measures relied upon within sustainability strategy as they relate to mechanical cooling
11. Greenhouse Gases – Construction Phase (as relied upon in the ES)
12. Greenhouse Gases – Operation Phase (as relied upon in the ES)
13. BREEAM 'Excellent' for commercial units (shell and core).
14. Boilers – NOx controls
15. Air Quality – NRMM controls
16. Water mitigations (low-flow, and efficiency controls) as relied upon in the ES
17. Provision of the cycle parking prior to the occupation of relevant phases
18. Opening hour restrictions (riverside commercial unit)
19. Compliance with Energy Strategy
20. Cycle parking – residential
21. Cycle parking – short stay/commercial
22. Shopfronts – roller shutter restrictions
23. Flood defense works (completed prior to occupation of relevant Plots)

Pre-commencement

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

24. Demolition and Construction Environmental Management Plan and Construction Logistics Plan (in consultation with TfL):
    a. Site manager's contact details and complaint procedure;
    b. Dust Management Plan incl. mitigation required by ES
    c. Measures to maintain the site in tidy condition, disposal of waste
    d. Recycling/disposition of waste from demolition and excavation
    e. Safe ingress and egress for construction vehicles;
    f. Numbers and timings of vehicle movements and access routes;
    g. Parking of vehicles for site operatives and visitors;
    h. Travel Plan for construction workers;
    i. Location and size of site offices, welfare and toilet facilities;
    j. Measures to ensure that pedestrian and cycle access past the site is safe and not unduly obstructed; and
    k. Measures to minimise risks to pedestrians and cyclists, including but not restricted to accreditation of the Fleet Operator Recognition Scheme (FORS) and use of banksmen for supervision of vehicular ingress and egress.
    l. Health and safety procedures
25. Land Contamination Remediation Scheme (subject to post completion verification).
26. Air Quality – mechanical ventilation and NOx filtration
27. S178 Highways Works – scheme of works
28. Implementation of an approved Site Waste Management Plan (SWMP).
29. Archaeology Written Scheme of Investigation (WSI). (2 stage) (GLAAS 1)
30. Archaeology foundation design and below ground works (GLAAS 2)
31. Submission of a detailed fire safety strategy (incl. Emergency Vehicle Access)
32. Environment Agency 2 (Habitat)
33. Water Efficiency (Part G calculation)
34. Overheating
35. DLR Radio Survey
36. Crossrail 1
37. Crossrail 2

<u>Pre-superstructure works</u>

38. Details of external facing materials and architectural detailing.
39. Approval of landscaping details, in consultation with the Metropolitan Police DOCO, to include:
    a. Wind mitigation measures as identified in the ES
    b. Street furniture.
    c. Lighting.
    d. Re-planting of trees and shrubs that die within 5 years of being planted.
    e. Landscape Management and maintenance plan.
40. Wind mitigation strategy (as relied upon in the ES)
41. Emergency Vehicle Access (consulted with LFB)
42. Detailed SuDS measures and Drainage Management Strategy (management and maintenance).
43. Details of ecological enhancement measures to include:
    a. At least 1000 square metres of biodiverse roofs following the best practice guidance published by Buglife – details provided should include the location and total area of biodiverse roofs, substrate depth and type, planting including any vegetated mat or blanket (though sedum mats should be avoided if possible) and any additional habitats to be provided such as piles of stones or logs;
    b. At least 1200 square metres of meadow, the majority of which should be in full sun – details to include location and total area of meadow, substrate type, means of meadow creation (seed, plug planting and/or wildflower turf), species mix and proposed management regime;
    c. habitat enhancements to the river wall, to be agreed with the Environment Agency;

d. landscaping to include at least three native tree species and a good diversity of nectar-rich plants to provide food for bumblebees and other pollinators for as much of the year as possible – details should include species list and planting plans;

44. Bat boxes, insect boxes and nest boxes for appropriate bird species – details should include number, locations and type of boxes.
45. Details of proposed 90 x wheelchair accessible homes which are to be built to Building Regulation Part M4(3)(a)
46. Secure by Design accreditation.
47. Approval of Delivery and Servicing Management Plan (DSMP)
48. Approval of Operational Waste Management Plan (OWMP).
49. Approval of a public realm management plan
50. Approval of the scheme of highway improvements to be secured in a S278 / S38 agreement.
51. Cycle parking – final details (inclusive of agreed off-site provision and securing prior to occupation of relevant phase)
52. Heritage Interpretation Strategy
53. LCY 3 (Roofs/birds)
54. LCY 2 (Cranes)
55. LCY 4 (Construction methodologies)
56. Noise (Overheating)
57. GLAAS 3 (Scheme of heritage interpretation, landscape, and display)
58. Way finding details (signage, etc.)

Pre-occupation works

59. Cycle parking associated with each Plot provided before homes to which they relate are occupied.
60. Electric Vehicle Charging Points (EVCPs) – active EVCP's installed and made operational and passive ECVPs enabled.
61. Noise – Post completion verification report into internal noise standards for approved homes.
62. Smart meters (as relied upon in the ES)
63. Thames Water (network infrastructure supply)

8.7 **Informatives**

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Environment Agency
4. GLAAS
5. Thames Water – proximity to assets.
6. MMO Marine Licence
7. Emission Flue height

Listed Building Conditions

Compliance

1. Time Limit (LBC)
2. Compliance with approved plans

Pre-commencement

3. Materials (detailed)

Pre-super structure

4. Heritage interpretation and landscape strategy

APPENDIX 1

LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-WAB-ZZ-00-DR-A-(20)0100	003	PLOT 3 & 4 GROUND FLOOR
2135-WAB-ZZ-00-DR-A-(20)010M	003	PLOT 3 & 4 MEZZANINE FLOOR
2135-WAB-ZZ-01-DR-A-(20)0101	003	PLOT 3 & 4 FIRST FLOOR
2135-WAB-ZZ-01-DR-A-(20)0102	003	PLOT 3 & 4 SECOND FLOOR
2135-WAB-ZZ-01-DR-A-(20)0103	003	PLOT 3 & 4 THIRD FLOOR
2135-WAB-ZZ-01-DR-A-(20)0104	003	PLOT 3 & 4 FOURTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0105	003	PLOT 3 & 4 FIFTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0106	003	PLOT 3 & 4 SIXTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0107	003	PLOT 3 & 4 SEVENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0108	003	PLOT 3 & 4 EIGHTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0109	003	PLOT 3 & 4 NINTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0110	003	PLOT 3 & 4 TENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0111	003	PLOT 3 & 4 ELEVENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0112	003	PLOT 3 & 4 TWELFTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0112	003	PLOT 3 & 4 TWELFTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0113	003	PLOT 3 & 4 THIRTEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0114	003	PLOT 3 & 4 FOURTEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0115	003	PLOT 3 & 4 FIFTEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0116	003	PLOT 3 & 4 SIXTEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0117	003	PLOT 3 & 4 SEVENTEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0118	003	PLOT 3 & 4 EIGHTEENTH FLOOR

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-WAB-ZZ-01-DR-A-(20)0119	003	PLOT 3 & 4 NINETEENTH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0120	003	PLOT 3 & 4 TWENTIETH FLOOR
2135-WAB-ZZ-01-DR-A-(20)0121	003	PLOT 3 & 4 ROOF PLAN
2135-WAB-40-XX-DR-A-(20)0500	001	PLOT 3 & 4 ACCESSIBLE APARTMENTS
2135-WAB-40-XX-DR-A-(20)0200	003	PLOT 3 & 4 SECTION A-A
2135-WAB-30-XX-DR-A-(20)0300	003	PLOT 3 WEST ELEVATION
2135-WAB-30-XX-DR-A-(20)0301	003	PLOT 3 SOUTH ELEVATION
2135-WAB-30-XX-DR-A-(20)0302	003	PLOT 3 EAST ELEVATION
2135-WAB-30-XX-DR-A-(20)0303	003	PLOT 3 NORTH ELEVATION
2135-WAB-40-XX-DR-A-(20)0300	003	PLOT 4 WEST ELEVATION
2135-WAB-40-XX-DR-A-(20)0301	003	PLOT 4 SOUTH ELEVATION
2135-WAB-40-XX-DR-A-(20)0302	003	PLOT 4 EAST ELEVATION
2135-WAB-40-XX-DR-A-(20)0303	003	PLOT 4 NORTH ELEVATION
2135-WAB-40-XX-DR-A-(20)0304	002	PLOT 4 SOUTH INTERIOR ELEVATION
2135-WAB-40-XX-DR-A-(20)0305	002	PLOT 4 NORTH INTERIOR ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0307	P01	SITE - NORTH ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0308	P01	SITE - SOUTH ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0309	P01	SITE - EAST ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0310	P01	SITE - WEST ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0311	P01	SITE - LONG SECTION
2135-GHA-ZZ-ZZ-DR-A-(10)0350	P01	EXISTING SITE - NORTH ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0351	P01	EXISTING SITE - EAST ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0352	P01	EXISTING SITE - SOUTH ELEVATION
2135-GHA-ZZ-ZZ-DR-A-(10)0353	P01	EXISTING SITE - WEST ELEVATION
2135-GHA-ZZ-00-DR-A-(10)0100	P01	SITE L00 PLAN
2135-GHA-ZZ-01-DR-A-(10)0101	P01	SITE L01 PLAN

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-GHA-ZZ-02-DR-A-(10)0102	P01	SITE L02 PLAN
2135-GHA-ZZ-03-DR-A-(10)0103	P01	SITE L03 PLAN
2135-GHA-ZZ-07-DR-A-(10)0107	P01	SITE L07 PLAN
2135-GHA-ZZ-19-DR-A-(10)0119	P01	SITE L19 PLAN
2135-GHA-ZZ-20-DR-A-(10)0120	P01	SITE L20 PLAN
2135-GHA-ZZ-ZZ-DR-A-(10)0001	P01	SITE LOCATION PLAN
2135-GHA-ZZ-ZZ-DR-A-(10)0002	P01	SITE PLAN
2135-GHA-ZZ-ZZ-DR-A-(10)0003	P01	PROPOSED SITE LOCATION PLAN
2135-GHA-ZZ-ZZ-DR-A-(10)0004	P01	PROPOSED SITE PLAN
2135-GHA-ZZ-ZZ-DR-A-(10)0311	P01	SITE - LONG SECTION
2135-GHA-10-ZZ-DR-A-(20)0300	P01	PLOT 1 - NORTH ELEVATION
2135-GHA-10-ZZ-DR-A-(20)0301	P01	PLOT 1 - EAST ELEVATION
2135-GHA-10-ZZ-DR-A-(20)0302	P01	PLOT 1 - SOUTH ELEVATION
2135-GHA-10-ZZ-DR-A-(20)0303	P01	PLOT 1 - WEST ELEVATION
2135-GHA-10-ZZ-DR-A-(20)0311	P01	PLOT 1 - PODIUM INTERNAL ELEVATION
2135-GHA-10-00-DR-A-(20)0100	P01	L00 GROUND FLOOR GA PLAN
2135-GHA-10-00M-DR-A-(20)0101	P01	L00 MEZZANINE FLOOR GA PLAN
2135-GHA-10-01-DR-A-(20)0102	P01	L01 FIRST FLOOR GA PLAN
2135-GHA-10-02-DR-A-(20)0103	P01	L02 SECOND FLOOR GA PLAN
2135-GHA-10-03-DR-A-(20)0104	P01	L03 THIRD FLOOR GA PLAN
2135-GHA-10-04-DR-A-(20)0105	P01	L04 FOURTH FLOOR GA PLAN
2135-GHA-10-05-DR-A-(20)0106	P01	L05 FIFTH FLOOR GA PLAN
2135-GHA-10-06-DR-A-(20)0107	P01	L06 SIXTH FLOOR GA PLAN
2135-GHA-10-11-DR-A-(20)0112	P01	L11 ELEVENTH FLOOR GA PLAN
2135-GHA-10-19-DR-A-(20)0120	P01	L19 NINETEENTH FLOOR GA PLAN
2135-GHA-10-30-DR-A-(20)0130	P01	L30 THIRTIETH FLOOR GA PLAN

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-GHA-10-31-DR-A-(20)0132	P01	L31 THIRTY FIRST FLOOR GA PLAN
2135-GHA-10-37-DR-A-(20)0138	P01	L37 THIRTY SEVENTH FLOOR GA PLAN
2135-GHA-10-38-DR-A-(20)0139	P01	L38 THIRTY EIGHTH FLOOR GA PLAN
2135-GHA-10-RL-DR-A-(20)0140	P01	ROOF LEVEL GA PLAN
2135-GHA-10-ZZ-DR-A-(20)0108	P01	L07-L10 SEVENTH - TENTH FLOOR GA PLAN
2135-GHA-10-ZZ-DR-A-(20)0113	P01	L12-L18 TWELVE - EIGHTEENTH FLOOR GA PLAN
2135-GHA-10-ZZ-DR-A-(20)0121	P01	L20-L29 TWENTIETH - TWENTY NINTH FLOOR GA PLAN
2135-GHA-10-ZZ-DR-A-(20)0133	P01	L32-L36 THIRTY SECOND - THIRTY SIXTH FLOOR GA PLAN
2135-GHA-10-ZZ-DR-A-(20)0200	P01	PLOT 1 - EAST WEST SECTION
2135-GHA-10-ZZ-DR-A-(21)0400	P01	PLOT 1 - TOWER BAY STUDY - EAST WEST BAY STUDY
2135-GHA-10-ZZ-DR-A-(21)0402	P01	PLOT 1 - PODIUM BAY STUDY - NORTH
2135-GHA-10-ZZ-DR-A-(21)0403	P01	PLOT 1 - TOWER BAY STUDY - SOUTH
2135-GHA-10-ZZ-DR-A-(21)0405	P01	PLOT 1 - PENTHOUSE BAY - EAST/WEST
2135-GHA-10-ZZ-DR-A-(21)0406	P01	PLOT 1 - PENTHOUSE BAY - SOUTH/ WEST CORNER
2135-GHA-10-ZZ-DR-A-(21)0410	P01	PLOT 1 - PODIUM BAY STUDY - EAST
2135-GHA-10-ZZ-DR-A-(70)0500	P01	L20-L29 GA PLAN TYPICAL 1B2P WCH UNIT
2135-GHA-10-ZZ-DR-A-(70)0502	P01	L19-L29 GA PLAN TYPICAL 2B4P WCH UNIT
2135-GHA-10-ZZ-DR-A-(70)0504	P01	L07-L18 GA PLAN TYPICAL 2B49 WCH UNIT
2135-GHA-10-ZZ-DR-A-(70)0506	P01	L02-L05 GA PLAN TYPICAL 2B3P WCH UNIT
2135-GHA-10-ZZ-DR-A-(70)0510	P01	L06 GA PLAN TYPICAL 3B4P WCH UNIT
2135-GHA-12-ZZ-DR-A-(70)0508	P01	L03-L05 GA PLAN TYPICAL P1.2 2B3P WCH UNIT
2135-LDA-ZZ-XX-DR-L-(94)0100	P04	LANDSCAPE ILLUSTRATIVE COLOUR PLAN - GROUND FLOOR & ROOFS
2135-LDA-ZZ-XX-DR-L-(94)0101	P04	LANDSCAPE GENERAL ARRANGEMENT PLAN - GROUND FLOOR
2135-LDA-ZZ-XX-DR-L-(94)0110	P04	LANDSCAPE GENERAL ARRANGEMENT PLAN - ROOFS
2135-LDA-ZZ-XX-DR-L-(94)0201	P04	GROUND FLOOR HARDWORKS PLAN

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-LDA-ZZ-XX-DR-L-(94)0202	P04	GROUND FLOOR FURNITURE PLAN
2135-LDA-ZZ-XX-DR-L-(94)0203	P04	GROUND FLOOR BOUNDARY & EDGE TYPES PLAN
2135-LDA-ZZ-XX-DR-L-(94)0210	P04	ROOFS HARDWORKS & BOUNDARY PLAN
2135-LDA-ZZ-XX-DR-L-(94)0211	P04	ROOFS FURNITURE PLAN
2135-LDA-ZZ-XX-DR-L-(94)0301	P04	GROUND FLOOR SOFTWORKS PLAN
2135-LDA-ZZ-XX-DR-L-(94)0310	P04	ROOFS SOFTWORKS PLAN
2135-LDA-ZZ-XX-DR-L-(94)0600	P04	LANDSCAPE INDICATIVE LEVELS AND DRAINAGE PLAN
2135-LDA-ZZ-XX-DR-L-(94)0700	P02	LANDSCAPE SITE SECTIONS GROUND FLOOR (1 OF 4)
2135-LDA-ZZ-XX-DR-L-(94)0701	P02	LANDSCAPE SITE SECTIONS GROUND FLOOR (2 OF 4)
2135-LDA-ZZ-XX-DR-L-(94)0702	P02	LANDSCAPE SITE SECTIONS GROUND FLOOR (3 OF 4)
2135-LDA-ZZ-XX-DR-L-(94)0703	P02	LANDSCAPE SITE SECTIONS GROUND FLOOR (4 OF 4)
2135-LDA-ZZ-XX-DR-L-(94)0710	P03	LANDSCAPE SITE SECTIONS ROOF TERRACES
2135-LDA-ZZ-XX-SC-L-(94)0900	P07	DRAWING REGISTER
2135-PHA-20-00-DR-A-(20)0100	P2	LEVEL 00
2135-PHA-20-01-DR-A-(20)0101	P2	LEVEL 01
2135-PHA-20-02-DR-A-(20)0102	P2	LEVEL 02
2135-PHA-20-03-DR-A-(20)0103	P2	LEVEL 03
2135-PHA-20-04-DR-A-(20)0104	P2	LEVEL 04
2135-PHA-20-05-DR-A-(20)0105	P2	LEVEL 05
2135-PHA-20-06-DR-A-(20)0106	P2	LEVEL 06
2135-PHA-20-07-DR-A-(20)0107	P2	LEVEL 07
2135-PHA-20-08-DR-A-(20)0108	P2	LEVEL 08
2135-PHA-20-09-DR-A-(20)0109	P2	ROOF LEVEL
2135-PHA-20-ZZ-DR-A-(20)0200	/	PROPOSED SECTIONS PLOT 2 NORTH-SOUTH AND WEST-EAST
2135-PHA-20-ZZ-DR-A-(20)0201	/	PROPOSED SECTION WEST-EAST - PLOT 1 HUB, THE SQUARE & PLOT 2 SCHOOL

APPLICATION DRAWING NO.	REVISED DRAWING NO.	DESCRIPTION
2135-PHA-20-ZZ-DR-A-(20)0202	/	PROPOSED SECTION WEST-EAST - PLOT 2 RESIDENTIAL
2135-PHA-20-ZZ-DR-A-(20)0300	/	PROPOSED ELEVATIONS PLOT 2 NORTH, EAST, SOUTH & WEST
2135-PHA-20-ZZ-DR-A-(20)0340	/	PLOT 1 - PROPOSED HUB BAY STUDY
2135-PHA-20-ZZ-DR-A-(20)0350	/	PLOT 2 - ELEVATION BAY STUDY - RESIDENTIAL
2135-PHA-20-ZZ-DR-A-(20)0360	/	PLOT 2 - ELEVATION BAY STUDY - SCHOOL
2135-GHA-A-SK-201005-AS	01	CIL Phasing Plan

LISTED BUILDING CONSENT APPROVED DRAWINGS

DRAWING	AUTHOR
2135-GHA-ZZ-ZZ-DR-A-(10)0060	GLEN HOWELLS ARCHITECTS
2135-GHA-ZZ-ZZ-DR-A-(10)0061	GLEN HOWELLS ARCHITECTS
SITE LOCATION PLAN 2135-GHA-ZZ-ZZ-DR-A-(10)0001	GLEN HOWELLS ARCHITECTS

OTHER APPLICATION DOCUMENTS

DOCUMENT	AUTHOR
LANDSCAPE STATEMENT (2135-LDA-ZZ-XX-RP-L-(94)0901)	LDA DESIGN
DESIGN & ACCESS SATEMENT; NOVEMBER 2020	GHA, PH, WHITE
INTERNAL DAYLIGHT & SUNLIGHT REPORT; OCTOBER 2020	GIA
DPR INITIAL DSLO REVIEW; 18 FEBRUARY 2021	DPR
DPR FINAL DSLO REVIEW; 24 MARCH 2021	DPR
GIA DSLO RESPONSE NOTE; MARCH 2021	GIA
DRAFT CIRCULAR ECONOMY STATEMENT; OCTOBER 2020	BURO HAPPOLD
DRAINAGE STRATEGY (BWY-BHE-XX-XX-RP-C-001)	BURO HAPPOLD
AQUATIC BIODIVERSITY IMPACT ASSESSMENT	GREENGAGE
AQUATIC BIODIVERSITY STRATREGY	GREENGAGE
ARBORICULTURAL IMPACT ASSESSMENT	GREENGAGE
BIODIVSERITY IMPACT ASSESSMENT	GREENGAGE
BREEAM ECOLOGY CREDIT REPORT	GREENGAGE
PRELIMINARY ECOLOGIAL APPRAISAL	GREENGAGE
TERRESTRIAL INVERTEBRATE STUDY	GREENGAGE
URBAN GREENING FACTOR ASSESSMENT	GREENGAGE
ENERGY & SUSTAINABILITY STATEMENT	BURO HAPPOLD
FIRE STATEMENT	BURO HAPPOLD

DOCUMENT	AUTHOR
FLOOD RISK ASSESSMENT	BURO HAPPOLD
HERITAGE ASSESSMENT	MONTAGU EVANS
LIGHTING ASSESSMENT	BURO HAPPOLD
NOISE IMPACT ASSESSMENT	BURO HAPPOLD
OUTLINE CEMP	BLUE SKY BUILDING
PLANNING STATEMENT	AVISON YOUNG
PRELIMINARY GEOTECHNICAL AND LAND CONTAMINATION	BURO HAPPOLD
STATEMENT OF COMMUNITY INVOLVEMENT	LCA
PARKING MANAGEMENT PLAN	ROBERT WEST
DELIVERY & SERVICING PLAN	ROBERT WEST
TRANSPORT ASSESSMENT	ROBERT WEST
OUTLINE SCHOOL TRAVEL PLAN	ROBERT WEST
RESIDENTIAL TRAVEL PLAN	ROBERT WEST
ENVIRONMENT AGENCY RESPONSE NOTE	BURO HAPPOLD
HIA REPSONSE NOTE; JUNE 2021	VOLTERRA
OPERATIONAL WASTE STRATEGY; MAY 2021	ROBERT WEST
TFL RESPONSE NOTE; MARCH 2021	ROBERT WEST
CYCLE PARKING NOTE; APRIL 2021	ROBERT WEST
DRAINAGE RESPONSE NOTE; MARCH 2021	BURO HAPPOLD

ENVIRONMENTAL STATEMENT DOCUMENTS

VOLUME/REPORT	DOCUMENT	AUTHOR
	NON-TECHNICAL SUMMARY (NTS)	TRIUM *(COMPILING AUTHOR – ALL)*
VOLUME 1	CHAPTER 1: INTRODUCTION	
	CHAPTER 2: METHODOLOGY	
	CHAPTER 3: ALTERNATIVES	
	CHAPTER 4: PROPOSED DEVELOPMENT	
	CHAPTER 5: CONSTRUCTION	
	CHAPTER 6: ARCHAEOLOGY	
	CHAPTER 7: BUILT HERITAGE	
	CHAPTER 8: SOCIO AND HEALTH	
	CHAPTER 9: TRANSPORT	
	CHAPTER 10: AIR QUALITY	
	CHAPTER 11: NOISE AND VIBRATION	
	CHAPTER 12: DSOSG	
	CHAPTER 13: AQUATIC ECOLOGY	
	CHAPTER 14: WATER RESOURCES, DRAINAGE & FLOOD RISK	
	CHAPTER 15: WIND (PARTS 1 – 5)	
	CHAPTER 16: GREENHOUSE GASES	

VOLUME/REPORT	DOCUMENT	AUTHOR
	CHAPTER 17: EFFECTS INTERACTION	
	CHAPTER 18: LSE AND CONCLUSIONS	
	CHAPTER 19: MITIGATION AND MONITORING	
	CHAPTER 20: GLOSSARY	
VOLUME 2	TOWNSCAPE AND VISUAL IMPACT ASSESSMENT (TVIA)	
VOLUME 3 (TECHNICAL APPENDICES)	INTRODUCTION	
	METHODOLOGY	
	ARCHAEOLOGY	
	BUILT HERITAGE	
	SOCIO-ECONOMIC, HEALTH & WELLBEING	
	HIGHWAYS AND TRANSPORT	
	AIR QUALITY	
	NOISE AND VIBRATION	
	DSO, SOLAR GLARE	
	AQUATIC ECOLOGY	
	WATER	
	WIND	
	GREENHOUSE GASES	
THIRD PARTY REVIEW	INTERIM REVIEW REPORT; APRIL 2021	TEMPLE GROUP
	FINAL REVIEW REPORT; JULY 2021	TEMPLE GROUP
ADDITIONAL INFORMATION	AIR QUALITY TECHNICAL NOTE; JUNE 2021	BURO HAPPOLD
ADDITIONAL INFORMATION	IRR RESPONSE NOTE; APRIL 2021	TRIUM
ADDITIONAL INFORMATION	FRR RESPONSE NOTE; MAY 2021	TRIUM