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**Application for Observations to a Neighbouring Planning Authority**

[click here for case file](#)

<b>Reference</b>	PA/24/00657 (GLA reference 2023/0836)
<b>Site</b>	Plot 1 at the former Bishopsgate Goods Yard site, Braithwaite Street, London, E1
<b>Ward</b>	Weavers (LB Tower Hamlets), Hoxton East and Shoreditch (LB Hackney)
<b>Proposal</b>	Observations requested by the Greater London Authority (GLA) in relation to 'Application for all Reserved Matters Approval (Access, Appearance, Landscaping, Layout and Scale) in respect of Plot 1 (GLA reference 2023/0836), pursuant to LB Tower Hamlets outline planning permission reference PA/14/02011 (GLA reference GLA/1200cd/12); LB Hackney planning permission reference 2014/2427 (GLA reference GLA/1200cd/13) dated 25/03/2022, for the erection of a building comprising 51,309 sq m of office floorspace (Class B1), 831 sq m retail uses (Use Class A1-A5), 6,392 sq m plant and ancillary space, landscaping, public realm, and all associated works.'
<b>Summary Recommendation</b>	Raise objections and detailed comments in response to a request for observations from the Greater London Authority
<b>Applicant</b>	Bishopsgate Goodsyrd Regeneration Limited
<b>Agent/ architects</b>	DP9/ Gensler/ Buckley Gray Yeoman
<b>Case Officer</b>	Rikki Weir
<b>Key dates</b>	<ul style="list-style-type: none"><li>- Application registered as valid on 13/03/2024</li><li>- Public consultation on 15/04/2024</li></ul>

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**EXECUTIVE SUMMARY**Plot 1 (RMA Site)

The purpose of this report is to present recommendations to Strategic Development Committee (SDC) on the assessment of the Reserved Matters Application (RMA) for Plot 1 of the consented Bishopsgate Goods Yard development in order to formalise the borough's response to the Greater London Authority (GLA). Reserved matters (appearance, landscaping, layout and scale) are described in detail in section 7 of this report. Approximately 72% of the wider consented site is in London Borough (LB) of Tower Hamlets, with the remainder (to the west) in

London Borough of Hackney. The majority of the Plot 1 site is within LB Hackney. The hybrid consent permitted Plot 1 in outline to provide up to 61,572 sqm total floorspace (GEA), with up to 54,320 sqm office (B1 use class) space, 945 sqm retail (A1, A2, A3, A5 use class) and 7,034 sqm plant/ ancillary space in a building of approximately 12-16 storeys.

The Bishopsgate Goods Yard scheme was granted hybrid planning permission (part outline and part detailed) and listed building consent by Sadiq Khan, the Mayor of London/ Greater London Authority (GLA) on 25 March 2022 after the previous Mayor of London (Boris Johnson) determined that the Mayor would be the Local Planning Authority on the application in accordance with their powers under article 7 of the Mayor of London Order and then powers conferred by Section 2A of the Town and Country Planning Act 1990 (as amended).

On 19 November 2020, Tower Hamlets Strategic Development Committee resolved to raise objections to the GLA in respect of the application. The committee also resolved that in the event of outline planning permission being granted by the Mayor, any future reserved matters applications should be determined by the Committee. In granting hybrid planning permission, the Mayor of London formally resolved that the GLA would continue to be the Local Planning Authority to determine any RMAs. On 18 May 2024, Strategic Development Committee resolved that borough observations shall be reported to committee only when the scale of development would fall within the committee terms of reference. The current RMA would meet the terms of reference for presentation to Strategic Development Committee.

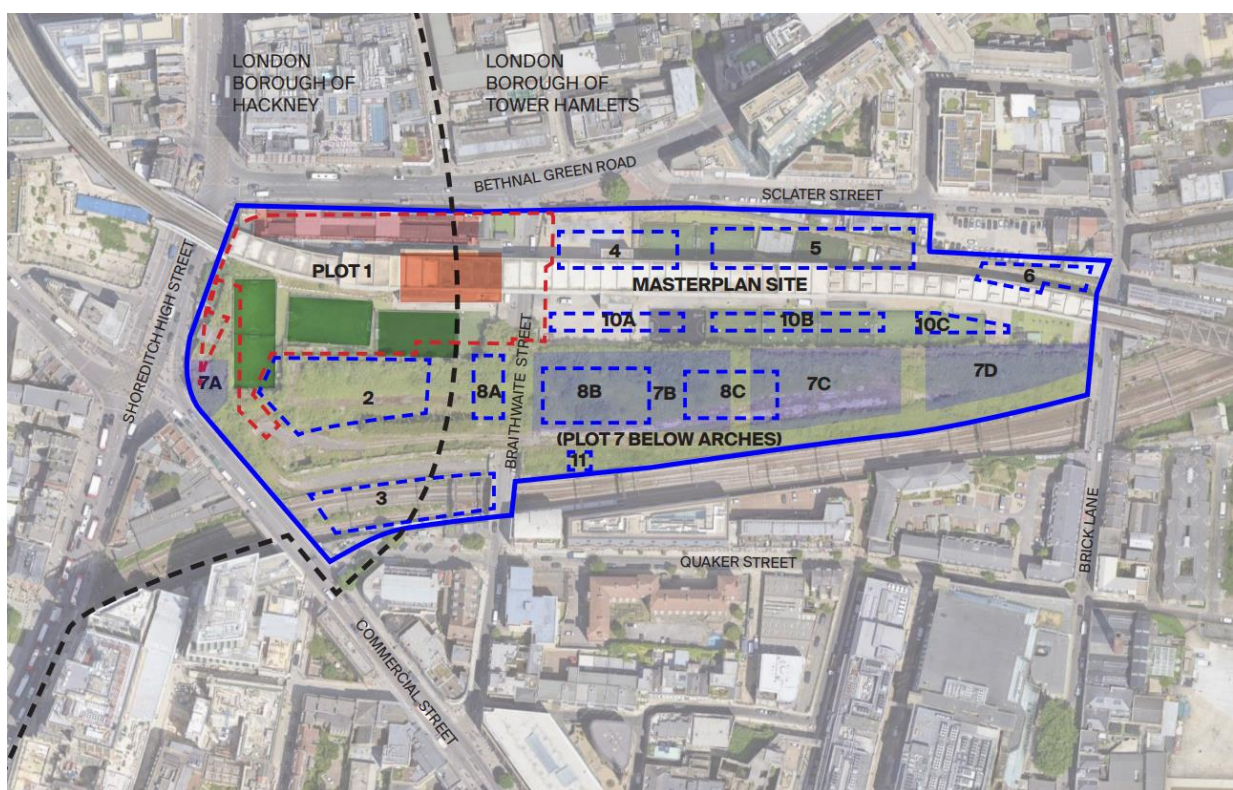


Figure 1: Site Plan (including black-dotted borough boundary line)

Plot 1 (shown in figure 1 in red outline) is predominantly within LB Hackney (also shown in appendices 1.3 and 1.8). It is bounded by Bethnal Green Road to the north, Shoreditch High Street to the west and includes Braithwaite Street to the east. To the south would be Plot 2 and Plot 10A. The raised and concrete-encased London Overground line runs east-west through the centre of this plot. Maximum and minimum parameters of building footprints, height and massing

were also consented along with a Design Guide to govern the form and design of the development coming forwards.

Officers have assessed the Plot 1 RMA proposals and consider that they broadly align with control documents and plans of the parent consent apart from in relation to 'Station Square,' the area around Shoreditch High Street station within LB Tower Hamlets. Officers recommend that objections are raised to the GLA for the following reasons:

- The 'Station Square' is not in accordance with the Design Guide and Site Allocation aspirations for additional public realm and a public square in the key, busy pedestrian approach to Shoreditch High Street station. The building massing/ footprint should be reduced to the minimum parameter extent at this location in order to provide the necessary additional public realm promised by the Design Guide
- The close proximity of the eastern end of the proposed Plot 1 building to future residential Plot 4, Plot 8A and Plot 10 would result in unacceptable mutual overlooking and poor levels of privacy to the new housing on the wider site. Taken into consideration with the concerns raised with the excessive visual impact of proposed built massing on Bethnal Green Road, Plot 1 should be reduced to the minimum parameter extent at the eastern end of the building

Further to the above, officers recommend that a number of comments (fully listed in 'Recommendation' section) are provided to the GLA in relation to design, highways, servicing and biodiversity suggestions, clarifications and requests. These points will need to be taken into consideration by the GLA in their assessment of the application.

#### Wider Consented Development Site

The wider consented development is arranged as a series of building plots (see figure 1 and figure 2 below), fronting existing streets (Bethnal Green Road and Sclater Street to the north, Commercial Street and Shoreditch High Street to the west, Brick Lane to the east and railway to the south) and linked with new internal routes. Plot 2 in LB Hackney has been consented in detail and would comprise office and retail space in a building of 17/29 storeys. Plot 7 (within both boroughs) is consented in detail and comprises the listed parts of the Braithwaite Viaduct, Oriel Gateway and associated structures, such as the spaces within refurbished railway arches. Plots 1 and 3 straddle the boundary of LB Tower Hamlets and LB Hackney and would provide office and commercial floorspace in buildings of up to 16 storeys (Plot 1) and 7 storeys (Plot 3). Plots 4, 5 and 10 in LB Tower Hamlets would provide residential development in a series of buildings situated on both sides of the Overground viaduct, along Bethnal Green Road and Sclater Street ranging from 6 storeys up to a maximum of 19 storeys. The scheme includes a 150 bed hotel in Plot 10.

Plot 6 would be purpose built for community/ cultural uses fronting onto Brick Lane and be up to 4 storeys in height. Plot 8 would provide residential and hotel floorspace in a building situated on top of the viaduct and up to 25 storeys in height, with two linked "pavilion" buildings of four storeys. Public open space is proposed above the Braithwaite Viaduct with access from different parts of the site. Retail, leisure and food and drink uses are proposed for the listed and un-listed Braithwaite Viaduct arches with access from 'London Road' (a new west/ east route from Wheler Street to Brick Lane) and 'Middle Road,' (a new parallel route from Shoreditch High Street to Brick Lane). New pedestrian routes from Sclater Street to 'Middle Road' would be provided in the form of 'Farthing Lane' and 'Cygnet Lane.' 'Kings Square' would be a new public square/ interface with Brick Lane and 'Webb Square' would be near to Shoreditch High Street. Plots

consented in outline (Plots 1, 3, 4, 5, 6, 10 and 11) are subject to maximum and minimum development parameters plans (building footprint and massing) as well as a Design Guide.

In policy terms, Bishopsgate Goods Yard is a site allocation in the Tower Hamlets Local Plan identified for redevelopment including housing, employment uses, strategic open space (minimum of 1 hectare), community/ local presence facility and a leisure facility. The consented development broadly addresses the requirements of the site allocation by providing a mixed use, employment-led scheme with an open space of 1.26ha, a community facility and space for cultural uses. Within the three B1 office buildings consented for the western end of the site, substantial areas of affordable workspace would be provided, discounted to up to 60% below local market rates. Heritage assets on the site include the Grade II listed Braithwaite Viaduct and Oriel Gateway on Historic England's Building's at Risk Register, which would be restored and brought back into use.

New retail space would be created across the site, but particularly in the restored historic arches (Plot 7). At least 10% of the retail floorspace is secured for independent retailers, including 2% for micro-entities and start up retailers. As well as the new open space, which would be provided at 'platform' level on top of the Braithwaite Viaduct, 1.3ha of new public realm would be created at ground floor level, including a new east/west pedestrian route ('Middle Road') linking Brick Lane with Commercial Street.

Affordable housing would be provided for 50% of habitable rooms, meaning that a viability assessment was not required. The affordable tenure split would be 49/51 affordable rent/intermediate, a departure from the usual 70/30 split, as policy allows flexibility of tenure for additional affordable units provided above 35%. Affordable rented units would be split 50/50 between London Affordable Rent and Tower Hamlets Living Rent. At least 50% of the intermediate units would be London Living Rent, including all of the three-bedroom units in this tenure, with the remainder as Discount Market Rent (DMR) and Shared Ownership. Income criteria secured through the S106 legal agreement for the DMR units ensures that this will be genuinely affordable. The mix of unit sizes for both intermediate and affordable rent housing is broadly in accordance with policy, with an emphasis on family-sized housing. The market sale housing is heavily skewed towards one bed units, although a condition is appended to the decision notice to ensure final submission of details and seeking to maximise family homes in the market sale tenure.

From a transport perspective, the consented development would provide a high density scheme in a highly accessible locating, providing additional pedestrian permeability and a contribution totalling £6,470,000 towards highways, pedestrian and cycling improvements in the vicinity of the site. The servicing of the site will be constrained due to the position of retained historic structures. There would be very significant additional vehicular movements on Wheeler Street which would provide access to servicing yards, along with some out-of-hours servicing taking place from Braithwaite Street. At present Braithwaite Street is virtually traffic free and is a well-used north/ south connection for pedestrians and cyclists. There would also be servicing yards off Bethnal Green Road and Sclater Street. The applicant provided a commitment to cap and target the reduction of servicing trips, secured through the S106 legal agreement, along with robust measures for its monitoring and enforcement. On balance, the proposed servicing arrangements were adjudged to be acceptable.

In daylight/ sunlight terms, there would be major impacts on a number of neighbouring properties under the maximum parameter scheme. The greatest impact would be to flats within the Avant Garde development to the north of the site, to a cluster of buildings at the eastern end of Sclater

Street and to flats above 154 Commercial Street facing Plot 3 in the south-west corner of the site – the impacts on a small number of flats within the latter would be particularly severe. A scheme built below maximum parameters would reduce harm to the amenities of Avant Garde building residents, though even the minimum parameter scheme would only result in a limited improvement for homes within 154 Commercial Street compared to the maximum.

With regard to the design, Plot 2 would be particularly bulky and imposing and have an impact, amounting to 'less than substantial harm' to the settings of surrounding conservation areas and associated listed buildings in the vicinity of the Goods Yard site. Plots 1 and 3 would have more localised impacts on the street scape. It is acknowledged that there would necessarily be some degree of adverse impact on heritage if a development of any substantive scale were to come forward on the site, based on its current underutilised condition. For the remainder of the site, the parameter plans and Design Guide are an acceptable basis for reserved matters applications.

In respect of the planning balance, the consented development would have significant townscape impacts on the surrounding area on account of the height and scale of the buildings. These include harm to the setting of heritage assets, to which the NPPF ascribes great weight and to the amenities of neighbours through loss of daylight and sunlight. The servicing needs of the development would detract from a key existing pedestrian and cycling route.

Against these harms and deficiencies are weighed the public benefits of the scheme. These include bringing the site into beneficial use in a manner consistent with the Local Plan site allocation, delivery of 50% affordable housing; the employment and business opportunities generated by the B1 offices, which include substantial areas of affordable workspace; the restoration of historic buildings at risk; the new pedestrian routes across the site; the retail floorspace, with a proportion for independent and start-up businesses; a fully fitted out community facility available at peppercorn rent; two locations for cultural uses; the financing of wider transport improvements; a new public park and public toilets. On balance, these public benefits were considered to outweigh the concerns set out above, including the 'less than substantial' harms to heritage assets identified to which great weight was given in the assessment.

# 1. SITE AND SURROUNDINGS

## Plot 1 (RMA site)

- 1.1 Plot 1 is located to the north-west of the wider consented development site predominantly within LB Hackney though also falling across the borough boundary into LB Tower Hamlets. It is bound by Bethnal Green Road to the north and Shoreditch High Street to the west. The raised and concrete-encased London Overground line runs east-west through the centre of this plot. The Plot 1 site currently houses temporary uses such as the BOXPARK food and retail outlets to the north, the Powerleague sports pitches in the north-west quadrant of the site and Shoreditch High Street station.
- 1.2 The proposed building is planned to straddle the Overground box with a taller element to the east towards Shoreditch High Street station within the Tower Hamlets portion. The Design Guide provides further control over the approach to scale, form, composition and materiality. The building is subject to a number of restrictions in terms of its relationship with Overground infrastructure, being subject to a 2 metre exclusion zone to allow for full access to the Overground box and also subject to restrictions to allow for exit/entrance to the station, including escape routes.

## Wider Consented Development Site

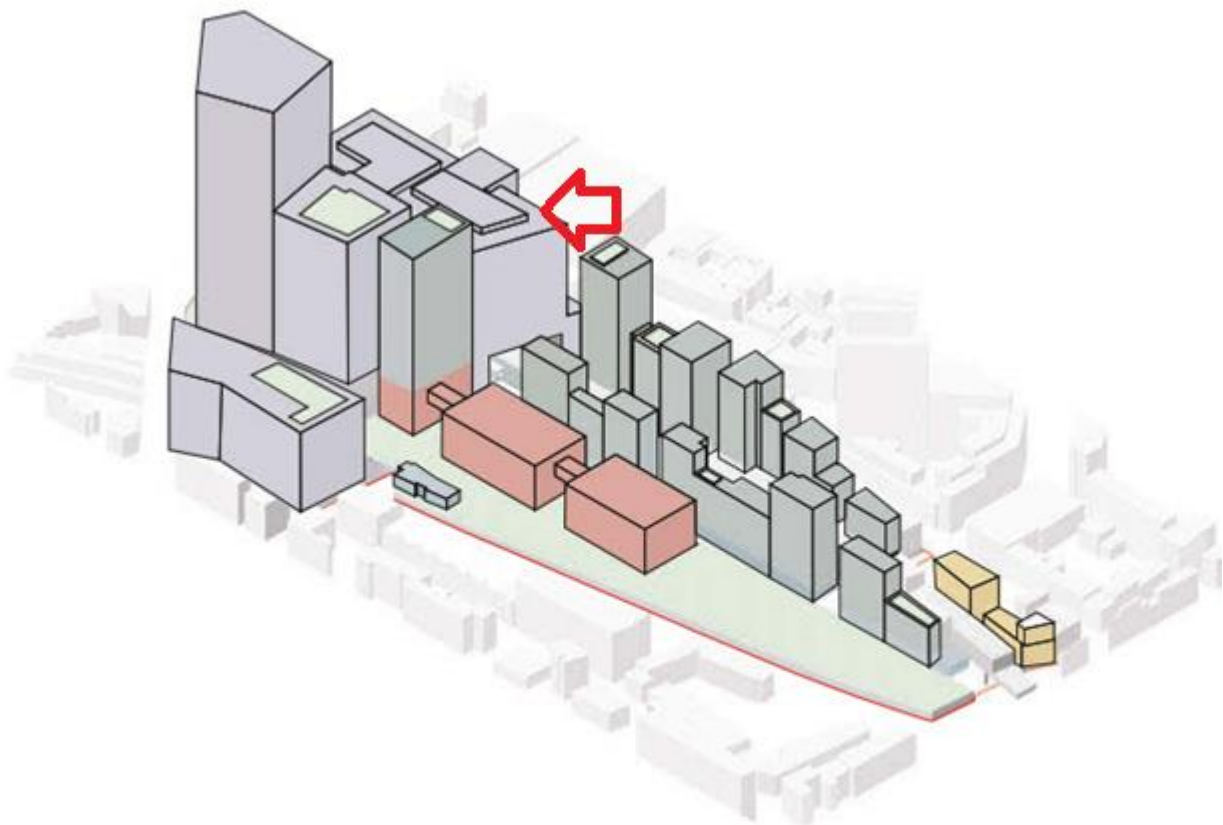


Fig 3.2.47: Mix of Uses



Figure 2: Maximum parameter massing of wider consented development showing land uses (Plot 1 shown with red arrow)

- 1.3 The site (shown in figure 3) is 4.4 hectares in size and straddles the boundary between the LB Tower Hamlets and the LB Hackney, with approximately 28% of the western end of the site in the neighbouring borough. The site is bounded by Bethnal Green Road/ Sclater Street to the north, Brick Lane to the east, Commercial Road to the west and open-cut railway lines serving Liverpool Street station to the south. Braithwaite Street/ Wheler Street passes north-south through the application site itself. The London Overground (Windrush line) railway with its elevated viaduct runs west-east through the site close to the northern edge and includes Shoreditch High Street station.
- 1.4 The most significant heritage structures remaining from the historical goods station and suburban line passenger station use are the Braithwaite Viaduct that formerly led into the goods terminus, an oriel window and associated gateway and forecourt wall (that face onto Shoreditch High Street), all of which are Grade II listed and are on Historic England's Heritage at Risk Register as they are in poor repair.
- 1.5 Parts of the site currently host two temporary uses. The northwest corner between the Overground viaduct and Bethnal Green Road is occupied by BOXPARK Shoreditch; shops, café and restaurants in repurposed shipping containers, whilst the centre of the site between the Overground and Braithwaite Viaduct is used for Powerleague Shoreditch football pitches.
- 1.6 A small area on the northern edge of the site, including the historic buildings fronting onto Sclater Street, is within the Brick Lane and Fournier Street Conservation Area. To the north-west of the site in the London Borough of Hackney, is the South Shoreditch Conservation Area. To the south-west is the Elder Street Conservation Area.
- 1.7 The majority of the site has the highest possible Transport for London (TfL) Public Transport Accessibility Level (PTAL) rating at 6b 'Excellent' with the remainder (to the east) having a PTAL of 6a, due to the quantity and range of bus services close by, as well as the presence on-site of Shoreditch High Street station.
- 1.8 Relevant Local Plan site designations:
- Site Allocation: Bishopsgate Goods Yard
  - Preferred Office Location
  - Tier 2 Archaeological Priority Area (Tier 2: Spitalfields and Brick Lane)
  - Green Grid Buffer Zone
  - London View Management Framework 8.1A
  - NO<sub>2</sub> Annual Mean concentration greater than 40 (µg<sub>m</sub>-3)
  - City Fringe Sub-area
- 1.9 Relevant London Plan site designations:
- City Fringe Opportunity Area
  - Central Activities Zone

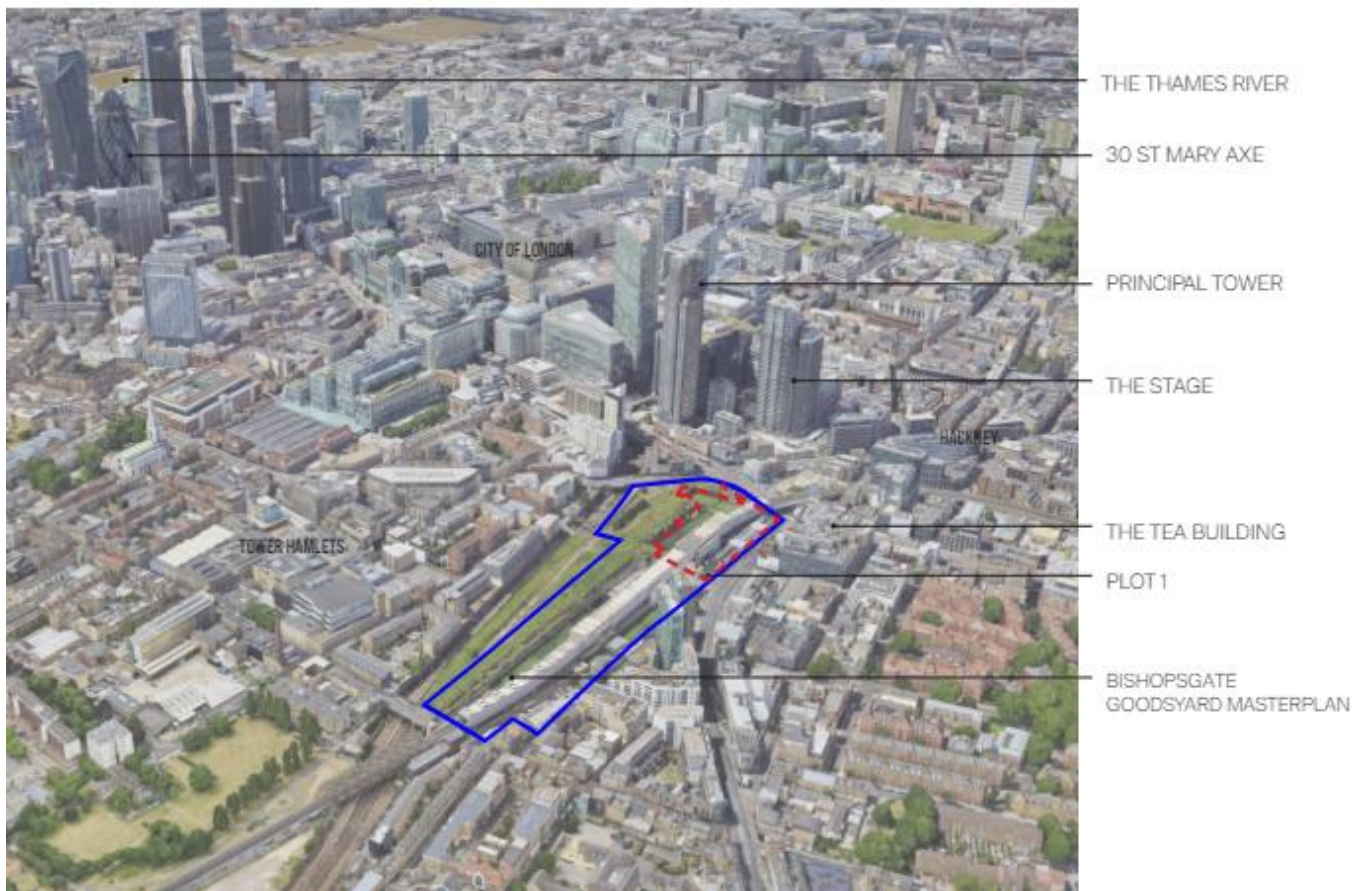


Figure 3: Aerial photograph of site

## 2. RMA PROPOSAL

- 2.1 Plot 1 was consented in outline and is subject to extensive controls within the Design Guide, approved parameter plans (see figure 5) and Development Specification. Plot 1 is proposed (see figure 4) to provide 51,820 m<sup>2</sup> (GEA) of commercial floor space (including 51,032 m<sup>2</sup> GEA office space and 788 m<sup>2</sup> GEA retail space) over 12-16 storeys in a building of up to 89.2m AOD in height. These figures are all within the maximum and minimum parameters.





Figure 4: Aerial visual of Plot 1

- 2.2 Entrances to Plot 1 are located on Bethnal Green Road, Shoreditch High Street and at ground level from Middle Road running along the southern edge of Plot 1. An internal lobby for the would interface with the entrance to Shoreditch High Street Overground Station.

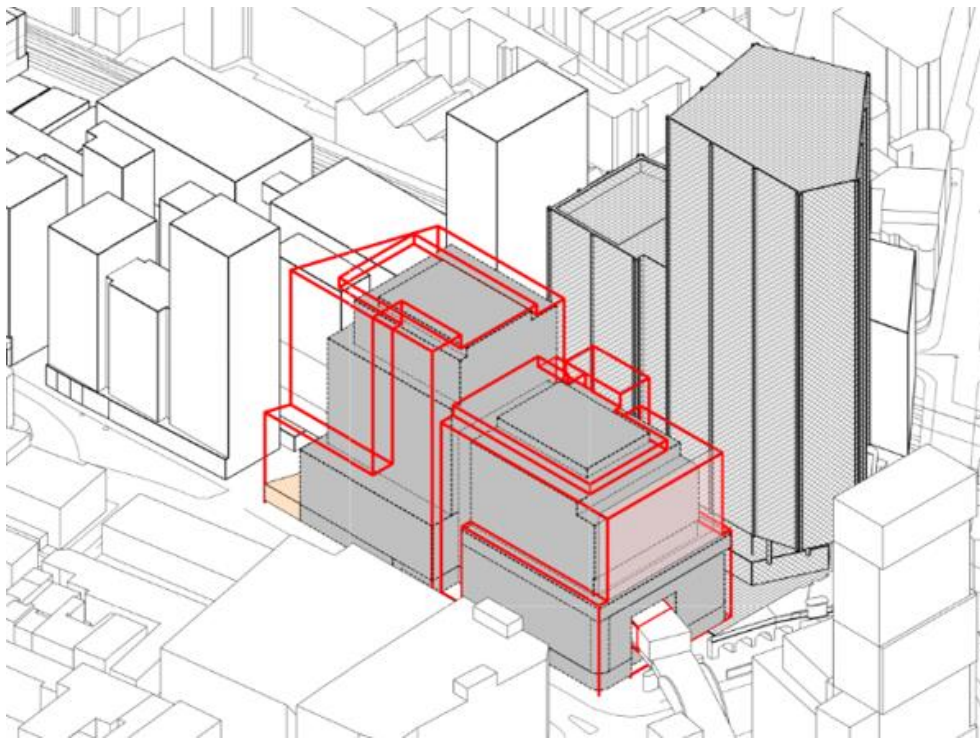


Figure 5: Maximum (red outline) and minimum (grey massing within red outlines) parameter massing for Plot 1

- 2.3 Street trees for Plot 1 would be located on Shoreditch High Street to the west of Plot 1 and the newly created Middle Street to the south of Plot 1. Plot 1 would include a substantial proportion of biodiverse green roof above the 11 storey elements of the scheme on the outer edge of the

building. Plot 1 would achieve an urban greening score of 0.15 (with a site-wide urban greening factor of 0.3 anticipated) and a Biodiversity Net Gain of 261.82%

### 3.0 RELEVANT PLANNING HISTORY

#### 3.1 PA/23/02025 permitted on 30/01/2024 for:

Application for non-material amendment to planning permission ref: PA/14/02011, dated 25/03/2022

Non-Material Amendment(s) sought:

Amendment to the approved maximum parameter plan drawings to allow the following design changes: 1) Lobby extension at ground floor brought outwards to the east, closer to the London Overground Station; 2) Changes to the façade, services, structure and floorplate around the station and railway infrastructure; 3) Amendment to the northern façade to align the plinth and upper structure

Amendment to the approved minimum parameter plan drawings to allow the following design changes: 1) Curved corners onto Shoreditch High Street; 2) Recessed façade on the southern side of the Plot 1 building at ground; 3) Additional space made for the loading bay at ground level. 4) Recess on the west elevation, level 6 and 7

#### 3.2 PA/14/02011 & PA/14/02096 (Listed Building Consent) permitted on 25/03/2022 for:

An OUTLINE application for the comprehensive mixed use redevelopment of the site comprising (floorspace in Gross Internal Area): Residential (Class C3) comprising up to 500 residential units; Business Use (Class B1) up to 130,940 sq.m.; Hotel (Class C1) up to 11,013 sq.m.; Retail, financial & professional services, restaurants, cafes & hot food takeaways (Class A1, A2, A3, A5) up to 18,390 sq.m. of which only 3,678 sq.m. can be used as Class A5; Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) up to 6,363 sq.m.; Public conveniences (sui generis) up to 298 m<sup>2</sup>; Basement, ancillary and plant up to 21,216 sq.m.

Formation of new pedestrian and vehicular access; means of access, circulation and car parking within the site and provision of new public open space and landscaping. The application proposes a total of 10 buildings that range in height, with the highest being 142.4m AOD and the lowest being 29.2m AOD.

With all matters reserved save that FULL DETAILS for Plot 2 are submitted for alterations to, and the partial removal of, existing structures on site and the erection of a building for office (Class B1) and retail use (Class A1, A2, A3, A5) comprising a part 17/ part 29 storey building; and Plot 7 comprising the use of the ground level of the Braithwaite Viaduct for retail and food & drink uses (A1, A2, A3, A5) and works to and use of the Oriel and adjoining structures for retail and food & drink uses (A1, A2, A3, A5). (Amended Description).

For that part of the site within the London Borough of Tower Hamlets, the proposed development comprises the following: Up to 44,067 sq.m. of residential use (Class C3); up to 21,341 sq.m. of Business Use (Class B1); up to 11,013 sq.m. of Hotel Use (Class C1); up to 13,881 sq.m. of Retail Use (Class A1, A2, A3, A5) of which only 2,776 sq.m. can be used for hot food takeaways (A5); Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) – up to 4,109 sq.m.; up to 298 sq.m. of sui generis use; up to 8,464 sq.m. of ancillary and plant space.

### Neighbouring Sites

- 3.3 The relevant planning history that relates to sites in close proximity to the application site is set out below:

***Land bounded by 2-10 Bethnal Green Road, 1-5 Chance Street (Huntingdon Industrial Estate) and 30-32 Redchurch Street***

- 3.4 PA/20/00557 permitted on 24/08/2022 for:

Demolition of the existing buildings, excluding the façade of 30-32 Redchurch Street, and redevelopment to provide a mixed-use development within a single building rising to three, seven and nine storeys maximum AOD height circa 56m comprising office (up to 14393 sq.m of B1(a)) floorspace, up to 1444 sq.m flexible commercial floorspace (B1(a)/B1(c)), and up to 1181 sq.m flexible retail floorspace (Use Class A1 and A3) along with servicing facilities, cycle parking, vehicle parking and associated works.

***201-207 Shoreditch High Street and 1 Fairchild Street (London Borough of Hackney)***

- 3.5 2023/2925 – Under consideration:

Erection of part 27 storey (125m), part 8 and part 7 storey building plus two levels of basement, to provide office floorspace (Use Class E) with retail floorspace (Use Class E) at ground floor level; landscaping to include market stalls and roof terraces; ancillary floorspace to include cycle parking, refuse/recycling storage and plant, with a loading bay and servicing access from Holywell Lane.

- 3.6 2015/2403 permitted on 12/04/2016 for:

Demolition of existing buildings and structures and erection of a part 7, part 10 and part 30 storey building (plus 2 levels of basement) comprising office (Class B1) and hotel (Class C1) accommodation with ancillary retail, restaurant, event space, lounge and amenity areas; roof terraces; refuse and recycling facilities; cycle parking; servicing and plant; and landscaping.

***7-11 Hearn Street and 24 Curtain Road (London Borough of Hackney)***

- 3.7 2017/0864 permitted on 23/03/2018 for:

Application to vary (under 73 of the Town and Country Planning Act 1990) conditions 1 and 55 of planning permission 2015/3453 dated 1/11/16 in order to provide 3,575 sqm floorspace as flexible D2 and/or B1 floorspace; 1,054sqm floorspace as flexible A1-A4/B1/D2 floorspace and 744 sqm floorspace as flexible A1-A4/D2 floorspace. Alterations to the façade and layout of Buildings 2 and 3

- 3.8 2015/3453 permitted on 01/11/2016 for:

Minor material amendment (under Section 73 of the Town and County Planning Act 1990) to planning permission 2012/3871, dated 07/10/2015. The amendment is to vary conditions 1 (approved plans), 55 (floorspace) and 56 (unit mix) in order to provide 27 additional units in Building one (412 residential units in total); the relocation of plant and uses ancillary to the residential building; alterations to the basement of the development; alterations to the floorplans, the cladding material and the elevations of Building one; and, minor increases in A1 - A4, B1 and C3 floorspace.

3.9 2012/3871 permitted on 07/10/2014 for:

Demolition of existing buildings and the excavation and exhibition of the remains of the Curtain Theatre (Class D1). Excavation of a basement structure containing flexible commercial floorspace, plant, car & motorbike parking & cycle storage.

Erection of 4 buildings around an area of new landscaped open space to comprise: a 40-storey tower to provide 385 residential units (Class C3), shared space and flexible retail/restaurant/bar floorspace at ground floor; a 9 storey building with office floorspace (Class B1) and flexible office/retail/professional services/restaurant/bar (B1/A1/A2/A3/A4) floorspace; a 13 storey building with office floorspace (Class B1) and flexible office/retail/professional services/restaurant/bar (B1/A1/A2/A3/A4) floorspace and loading bay; & 2 storey education & events building (Mixed Use Class D1 and D2).

Erection of a 4-storey temporary structure to provide flexible retail/professional services/restaurant/bar floorspace units (A1/A2/A3/A4) and office units (Class B1). Works of demolition, alteration, extension to the railway viaduct and change of use to provide flexible retail/professional services/restaurant/bar floorspace (Class A1/A2/A3/A4) within the refurbished arches, open space and a single storey extension to the top of the viaduct to provide retail floorspace (class A1).

New open space to provide a link between Great Eastern Street, Hewett Street & Plough Yard. Associated works including the protection and treatment of buildings to be retained, temporary removal & reinstatement of 3 Grade II listed bollards on Curtain Road, surfaces, landscaping, lighting & cycle storage.

#### **4. STAKEHOLDER ENGAGEMENT AND PUBLICITY**

4.1 The applicant undertook extensive pre-application engagement with officers of LB Tower Hamlets, LB Hackney and the GLA on this RMA. The applicant also undertook some consultation with local residents, ward councillors and other relevant stakeholders, as well as presentation at the Greater London Authority's Design Review Panel (DRP). The Statement of Community Involvement submitted with the RMA provides a more detailed summary of the consultation to date and ongoing engagement. The applicant's pre-application consultation consisted of letters sent out to properties, local press adverts, a project website, emails, public exhibitions and meetings with ward councillors.

4.2 As the GLA are the Local Planning Authority for this application, they are required to undertake the statutory public consultation process (sending neighbour letters, erecting site notices, advertising in the local newspaper and consulting statutory bodies) not the Council. Notwithstanding the above, the Council have still received 3 letters of representation in objection. The concerns that were raised are outlined below. It should be noted that whilst the below provides a summary of the responses received, officers have had regard to the full public comments.

##### Issues raised by public in objection

- Profound and irreversible impact on local community quality of life
- Overshadowing, obstruction of natural light, infringing on privacy and contravention of Right to Light Act
- Lack of community involvement, taken aback to learn of this proposal without prior consultation

- Extensive construction period with associated noise and heavy traffic
- Uncertainty around the project has caused anxiety. How will negative effects of this development be mitigated?

Officer response: The Rights of Light Act is not a planning consideration. Other issues raised are covered in section 7 of this report.

## **5. CONSULTATION RESPONSES**

- 5.1 Below is a summary of the consultation responses received from internal consultees from initial consultation stage. The GLA, as the Local Planning Authority for this application, will have to consult statutory consultees and will have its own internal consultees.
- 5.2 It should be noted that whilst the below provides a summary of the responses received, officers have had regard to the full submissions when assessing the proposed development.

### **Internal responses**

#### **LBTH Arboriculture:**

- 5.3 Comments incorporated in section 7 of this report.

#### **LBTH Local Flood Authority:**

- 5.4 They are a statutory consultee and the GLA are required to consult them.

#### **LBTH Growth and Economic Development:**

- 5.5 In the absence of a Joint Borough Employment Officer (as stipulated by the parent consent s106), any obligations concerning LBTH are to be sent through to LBTH officers for approval, administration and monitoring towards meaningful implementation in Tower Hamlets.

#### **LBTH Local Highways Authority**

- 5.6 Comments incorporated in section 7 of this report.

#### **LBTH Place Shaping (Design and Heritage)**

- 5.7 Comments incorporated in section 7 of this report.

#### **LBTH Waste:**

- 5.8 Comments incorporated in section 7 of this report.

## **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 November 2023, the Tower Hamlets Draft New Local Plan (Regulation 18 Consultation Version) was published, and public consultation ran from 6 November 2023 to 18 December 2023. This is currently considered to carry minimal weight in the decision-making process.

6.3 The Development Plan comprises:

- London Plan (2021)
- Tower Hamlets Local Plan 2031 (2020)

6.4 The key Development Plan policies relevant to the proposal are:

6.5 Land Use (*residential, employment, retail, restaurant, cultural*)

- London Plan policies: H1, E1, E2, E3, E4, E7, E9, HC5, HC6
- Local Plan policies: S.H1, S.EMP1, D.EMP2, D.TC3, D.TC4, D.TC5, S.CF1, D.CF2, D.CF3

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

- London Plan policies: D1, D3, D4, D5, D8, D9, D11, D12, HC1, HC2, 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
- Local Plan policies: D.DH8, D.ES9

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

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

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

- London Plan policies: G5, G6, G7, SI1, SI2, SI5, SI8, SI12, SI13
- Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.MW3

### **Other policies and guidance**

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

- National Planning Policy Framework (2023)
- Planning Practice Guidance (2024)
- National Design Guide (2021)

*Greater London Authority*

- Development Viability LPG (Draft)
- Digital Connectivity Infrastructure LPG (Draft)
- Fire Safety LPG (Draft)
- Air Quality Positive LPG (2023)
- Air Quality Neutral LPG (2023)
- Characterisation and Growth Strategy LPG (2023)
- Optimising Site Capacity LPG (2023)
- Urban Greening Factor LPG (2023)
- Circular Economy Statements LPG (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)

- Whole Life Carbon LPG (2022)
- Be Seen Energy Monitoring LPG (2021)
- Public London Charter LPG (2021)
- Housing SPG (2016)
- City Fringe Opportunity Area Planning Framework (2015)
- Social Infrastructure SPG (2015)
- Accessible London: Achieving an Inclusive Environment SPG (2014)
- The Control of Dust Emissions during Construction and Demolition SPG (2014)
- Play and Informal Recreation SPG (2012)
- All London Green Grid SPG (2012)
- Planning for Equality and Diversity in London SPG (2007)

*Tower Hamlets*

- Planning Obligations SPD (2021)
- Reuse, Recycling and Waste SPD (2021)
- High Density Living SPD (2020)
- Development Viability SPD (2017)

*Other*

- Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022)

## **7. PLANNING ASSESSMENT**

7.1 The base planning permission is a hybrid permission for development as per paragraph 3.2. Development on Plot 1 was consented in outline. The form of the outline development is controlled through conditions of the hybrid planning permission and the associated section 106 legal agreement. The three principal control documents for the outline component are as follows:

- Parameter Plans – these define where buildings, roads and open space may arrive on the site, the distribution of uses across the site and maximum heights and maximum footprints (length and width) of each development plot.
- Development Specification – this document sets out a written account of the parameter plans and details, the floorspace specifications for the proposed land uses, minimum and maximum vehicle parking and minimum cycle parking and open space, and the range of dwelling mix for each tenure.
- Design Guide – The purpose of this document is to determine a design language for the Masterplan and to establish a robust framework for its development that encourages high quality and draws influence from the historic nature of the site. Any future reserved matters applications for the development of any of the Plots defined in the Parameter Plans or open spaces between them will be required to accord with the Design Guidelines, unless there is a good and justified reason to depart from them.

7.2 The matters reserved for determination are as follows (as set out and defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015)

- Access – meaning the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network;
- Appearance – meaning the aspects of a building or place within the development which determines the visual impression the building or place makes, including the

external built form of the development, its architecture, materials, decoration, lighting, colour and texture;

- Landscaping – meaning the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and including: screening by fences, walls or other means; the planting of trees, hedges, shrubs or grass; the formation of banks, terraces or other earthworks; the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and the provision of other amenity features
- Layout – meaning the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development;
- Scale – meaning the height, width and length of each building proposed within the development in relation to its surroundings;

7.3 The reserved matters application subject of this report relates to Development Plot 1. Plot 1 is located at the north-west of the Bishopsgate Goods Yard site. The principle of the development has been established by the outline planning permission and, as described above, certain requirements as to the detailed design and form of the development have been set by the associated parameter plans, development specification and design guide documents secured by conditions of the outline planning permission. Some other aspects of the development which fall outside the scope of the reserved matters have also been reserved by the s106 planning obligations and separate compliance conditions requiring submission of particular details together with the application for approval of reserved matters.

7.4 It is important to note that the application is only for approval of the five reserved matters set out above. Considerations which do not relate to the reserved matters are not material to determination of the application other than as specifically brought-in by relevant compliance conditions or where the matter in question would directly prejudice implementation of the remainder of the masterplan in accordance with the permission. Any material submitted by the applicant which does not relate to the reserved matters or the relevant compliance conditions is for illustrative purposes only and, if applicable, would be formally discharged under separate approval of detail applications.

7.5 The Planning Policy Guidance specifies that conditions relating to anything other than the matters to be reserved can only be imposed when outline planning permission is granted. The only conditions which can be imposed when the reserved matters are approved are conditions which directly relate to those reserved matters.

#### *Environmental Impact Assessment*

7.6 An Environmental Compliance Report (ECR) has been submitted with the current application. The ECR assesses the extent to which the reserved matters application is compliant with the likely significant environmental effects as presented in the 2019 Environmental Statement Addendum (ESA) and remains valid. The ECR concludes that there are no changes to the findings of the 2019 ESA as a result of the confirmed details of Plot 1 and the changes in the scheme, notably in the construction programme. GLA officers will be required to further scrutinise this element.

7.7 The key issues raised by the proposed development are:

- i. Land Use
- ii. Design and Heritage
- iii. Neighbour Amenity
- iv. Highways and Servicing



## LAND USE

### Site Allocation

- 7.8 The Plot 1 site falls within the wider Bishopsgate Goods Yard Site Allocation in the Local Plan (illustrated in figure 6). Land use requirements specified for the site allocation are for housing and employment (a range of floorspace sizes, including small and medium enterprises). The Plot 1 proposal is office-led and includes ground floor retail units, therefore the land uses proposed would be in accordance with site allocation requirements for Plot 1. Plots 4, 5, 8 and 10 provide housing.
- 7.9 Infrastructure requirements for the site allocation are for a strategic open space (minimum 1 hectare), community/ local presence facility and leisure facility. These elements are consented to be provided on the wider site, rather than Plot 1.

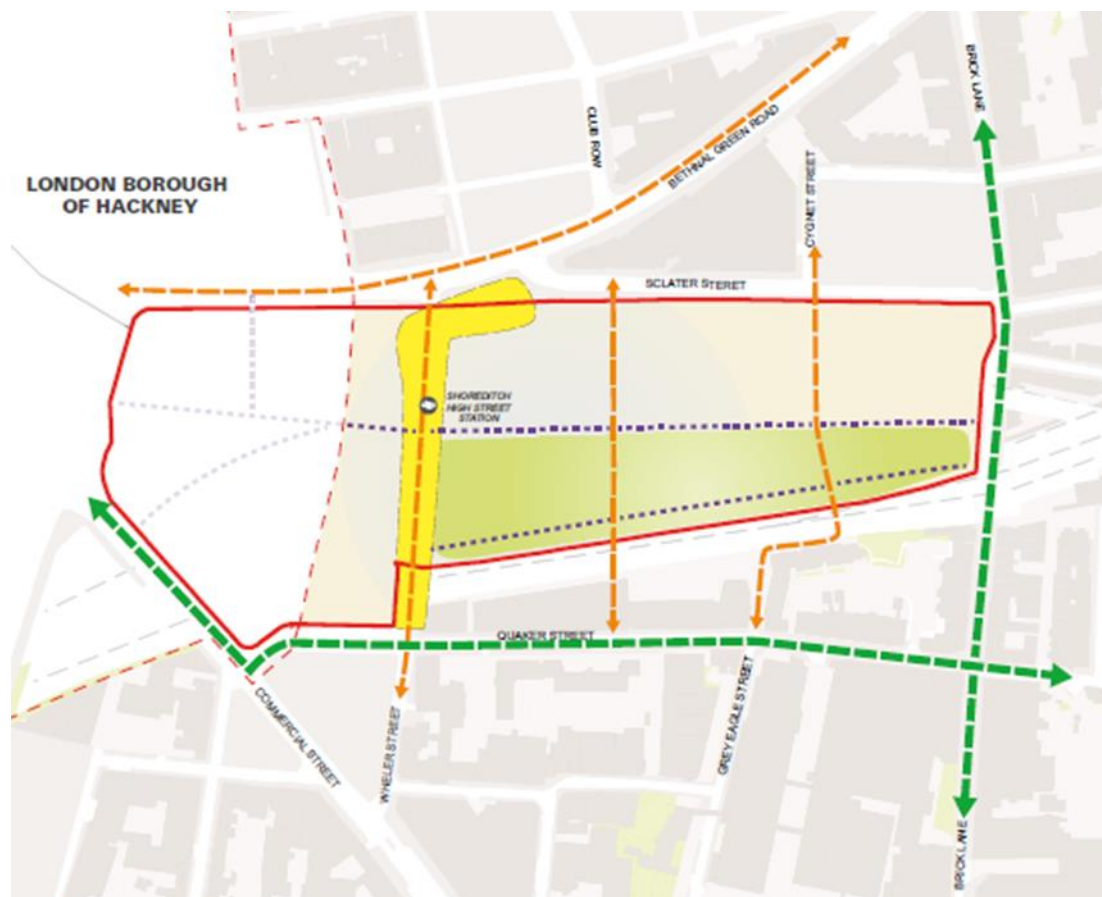


Figure 6: Local Plan Bishopsgate Goods Yard Site Allocation (Site Allocation boundary in red; public square in yellow; strategic pedestrian/ cycling routes in orange; green grid in green)

- 7.10 Design principles for the site allocation are that development will be expected to:
- respond positively to the existing scale, height, massing and fine urban grain of the surrounding built environment
  - protect or enhance heritage assets on site including the existing Grade II-listed Braithwaite Viaduct, Oriol gate and the forecourt wall fronting Shoreditch High Street and sensitively consider its impacts on the conservation areas, strategic and local views. Development should also protect or enhance heritage assets in the surrounding areas (including within the London Borough of Hackney)
  - focus larger-scale buildings around Shoreditch High Street Overground station

- d) integrate development with the surrounding area and improve the street frontage and public realm on key routes, particularly along Wheler Street and ensure it is well integrated into the public squares to the east and south of the station
- e) maximise the provision of family homes
- f) improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space. These should align with the existing urban grain to support permeability and legibility
- g) provide open space with a minimum size of one hectare, consolidated and integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct
- h) improve biodiversity and ecology within the open space and green infrastructure, and
- i) improve movement through the area and repair fragmented urban form (e.g. locate a community/local presence facility on key routes).

7.11 Delivery considerations for the site allocation are as follows:

- a) Community infrastructure requirements should be delivered in the early stage of the development to ensure the provision of new homes and jobs are supported by infrastructure.
- b) The community/local presence facility should be delivered within or adjacent to the Brick Lane district centre.
- c) Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.
- d) Development should coordinate consultation across planning authorities and address cross-boundary issues.

7.12 An assessment against Local Plan site allocation design principles and design considerations will be made in the 'Design and Heritage' section of this report.

#### Proposed Office Uses

7.13 The approved Development Specification states that the principle land use of Plot 1 shall be business (B1 use class). The Development Specification and Design Guide state that the maximum area (sqm GEA) of office space for Plot 1 is 54,320 sqm and the minimum is 36,504 sqm.

7.14 As shown by figure 1 and figure 7, the majority of the proposed Plot 1 building falls within LB Hackney rather than LB Tower Hamlets. Within LB Tower Hamlets, 9,973 sqm office space is proposed, whilst in LB Hackney, 41,059 sqm office space is proposed. Overall, this would equate to 51,039 sqm office space (illustrated in appendix 1.9), which is under the maximum and over the minimum stated in the Development Specification.

7.15 Affordable workspace provisions have been secured by the hybrid planning permission for the office space. For the reasons above, the proposed office space would be acceptable and in accordance with Development Plan policies.

#### Proposed Retail Uses

7.16 The approved Development Specification states that other land uses of Plot 1 apart from office shall be retail (A1, A2, A3, A5 use class). The Development Specification and Design Guide state that the maximum area (sqm GEA) of retail space for Plot 1 is 945 sqm and the minimum is 631 sqm.

7.17 Although the Development Specification states that Plot 1 could be 100% office, it is positive that ground floor retail uses have been proposed. As shown by figure 1 and figure 7, the majority of the proposed Plot 1 building falls within LB Hackney rather than LB Tower Hamlets. Within

LB Tower Hamlets, there would be 149 sqm retail space proposed, whilst in LB Hackney there would be 639 sqm retail space proposed. Overall, this would equate to 831 sqm retail space, which is under the maximum and over the minimum stated in the Development Specification.

- 7.18 The 19/11/2020 Tower Hamlets Strategic Development Committee resolved to raise objections to the hybrid consent in relation to *'the retail offer and business strategy.'* Affordable retail and local, independent business provisions were subsequently secured by the hybrid planning permission s106 legal agreement. For the reasons above, the proposed ground floor retail space would be acceptable and in accordance with Development Plan policies.

#### Proposed Plant/ Ancillary Space

- 7.19 The approved Development Specification and Design Guide state that the maximum area (sqm GEA) of plant/ ancillary space for Plot 1 is 7,038 sqm and the minimum is 4,637 sqm. The split of plant/ ancillary floor area between the boroughs is unclear within the Planning Compliance Statement, however the proposed overall 6,392 sqm in Plot 1 is under the maximum and over the minimum stated in the Development Specification.

#### Land Use Conclusion

- 7.20 For the reasons above, the proposed land uses (office-led development with retail space at ground level and ancillary plant) would be acceptable in principle, subject to all other policy considerations.

### **DESIGN AND HERITAGE**

#### Background

- 7.21 The proposed development on Plot 1 is subject to consented footprint, scale and massing ranges within approved parameter plans. The approved Design Guide outlines extensive guidance for the design of the Plot 1 building under the following headings:

- Use and Quantum
- Quantum of Uses
- The Ground Level
- Plinth Levels
- Upper Levels
- Area Flexibility
- Scale and Massing
- Constraints and Influences
- Heritage Interfaces
- Building Maximum and Minimum Parameters
- Station Square
- Set backs
- Articulated form
- Composition and Materiality

- 7.22 The submitted 'Design Overview Statement – RMA' includes a checklist of all relevant Design Guide points for Plot 1 (see Appendix 2). This checklist outlines how the proposed development has complied with all relevant Design Guide guidance for Plot 1 and is supported by justification within the wider Design Overview Statement. The submission also includes an Environmental Compliance Report (Townscape and Visual Impact Addendum).

- 7.23 The proposed development falls within the approved parameters in respect of building footprints (see appendix 1.8), heights, scale and massing (see figure 7 and appendix 1.6). The height of

the building is proposed to be 12-16 storeys and currently envisaged to be a maximum 89.2m AOD. Visuals of the proposed development are shown in figure 8 and appendix 1.1. An NMA (PA/23/02025) was recently approved with minor amendments to parameter plans.

### Design (General)

- 7.24 In general, the building is felt to be more successful at the western end of the proposals – the face of the building, within LB Hackney. Less consideration appears to have been given to the details of the eastern end of the building within LB Tower Hamlets and the relationship of the building with Shoreditch High Street station/ 'Station Square.' This may be as a result of the lack of clarity surrounding the adjoining uses, both in terms of the way in which the station will be detailed in the future and uncertainty with adjoining future residential uses (Plot 4) and their internal layouts.
- 7.25 The middle and base of the eastern end of the building (see figure 7 and figure 8) seem unrelated, and a design detail that introduces a familial language would help integrate them and improve the building's cohesion. On the northern (see figure 8) and southern (see appendix 1.3) elevations, the impact of the glazed ribbon detail, a striking transitional feature of the proposals, has been reduced because rather than being recessed (as it is on the western and eastern ends), it is in the same plane as the upper parts of the building.

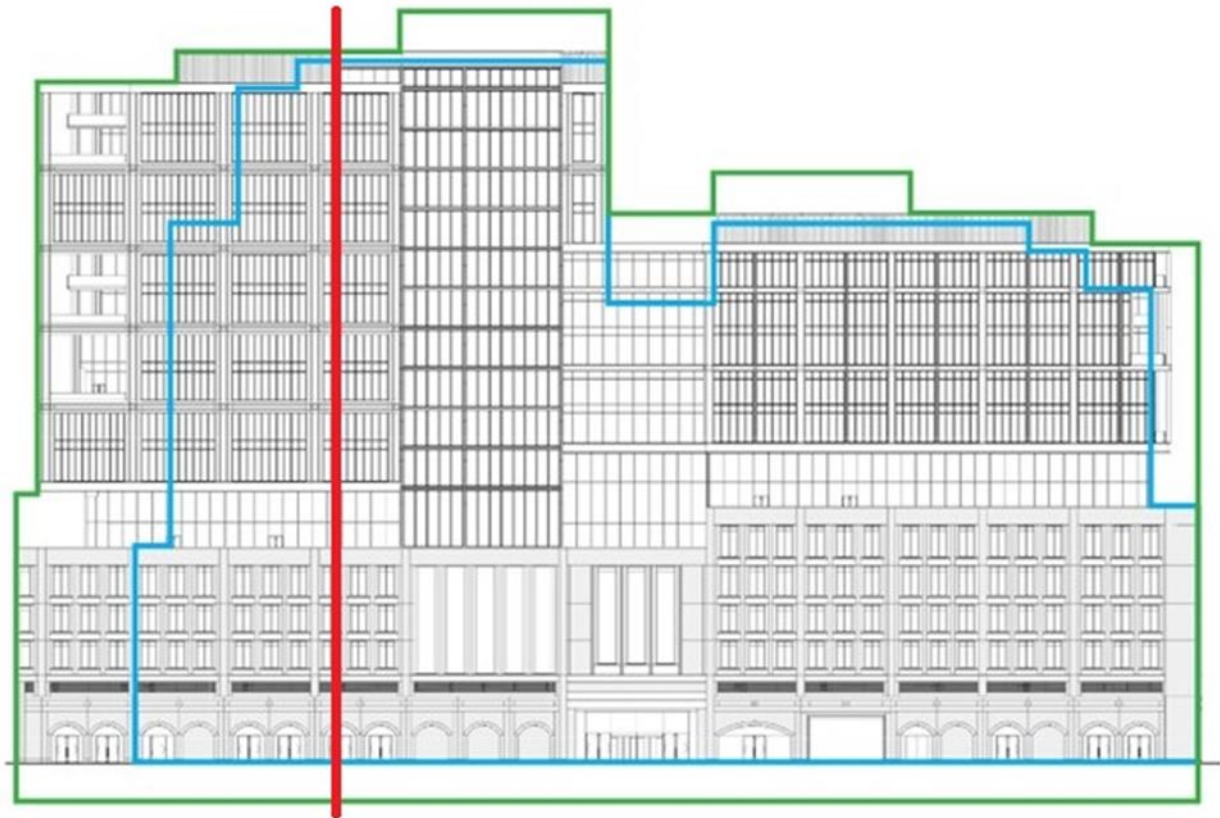


Figure 7: Proposed north elevation (on Bethnal Green Road) with LB Tower Hamlets to left (east) of red line. Blue outline is minimum parameter massing; green outline is maximum parameter massing

- 7.26 The proposals have been the subject of considerable pre-application discussions with the GLA, LB Tower Hamlets and LB Hackney and have been revised many times. This has resulted in some discrepancies between the plans and visualisations in the submission, which makes it difficult to assess what will be delivered. Examples include:
- Some of the ground floor plans show the internal north/ south link within Plot 1 as having revolving doors, whilst others show swing doors. Revolving doors change the perception of this space, from public walkway to office lobby, so these need to

be clarified. In addition, some CGIs show revolving doors whilst other CGIs and elevations show double leaf swing doors. The door type will alter the façade's appearance, therefore updated elevations and CGIs should be provided.

- The CGIs and plans show the entrance to the station differently – some have the gantry over Braithwaite Street while CGIs in the DAS omit it all together.
- The keys on a number of the plans do not clarify which material No.10 refers to. It appears that it might be a solid section around the windows – the elevations look like it is to be glass but for technical reasons it may need to be solid. The material chosen for this section will have a large impact on the overall feel of the scheme, therefore further details should be provided at this stage.
- Paragraph 5.23 (page 54), of the Design Overview Statement contains a visualisation (03) of the view along 'Middle Road' looking east. This CGI looks like an earlier visualisation showing the stair arrangement before it was amended. The applicant should confirm whether this CGI reflects the updated stair design or update accordingly.

7.27 Officers are satisfied that the north-west and south-west edges of the plinth (shown in appendix 1.1) now have mirroring curved corners. This change creates a more balanced form and improves the building's symmetry. However, at the top of the building at the north-west and south-west, the corner above the recessed glazed ribbon is square. The lack of curved corners on the upper parts of the building creates a somewhat discordant and jarring juxtaposition between the curved corners on the base.

7.28 Paragraph 4.4.21 of the Design Guide requires that the service access into Plot 1 from Bethnal Green Road will be visually integrated into the proposed architecture – officers are not convinced that it is. In the proposed north elevation (see figure 7), the entrance to the service yard seems out of proportion with adjoining arches, being both higher and wider. It is also extremely utilitarian in appearance. Consideration should be given to introducing an arch to the top of this service yard access. Assuming that gates are required, it should be ensured that these are sufficiently decorative, bespoke and attractive.

7.29 The quality of the materials and the detailing will be key to the success of the scheme. The choice of brick, mortar colour, the colour and finish applied to the structural steel, the spandrel panels, and the curtain wall system design will all be key to the success of the building. Final details are already secured as part of the hybrid consent conditions.

7.30 Elements such as the soffits to the balconies and terraces would benefit from refinement, particularly on the overhang over the terrace on the eastern side of the building, which would be visible from the surrounding streets. Officers suggest that the opportunity to add public art to this undercroft rather than visible structural steel beams, should be explored. The balustrades to the terraces also need to be carefully considered to ensure that they reflect what will be delivered. For example, the balustrades appear to be 1100mm high on the visualisations, but due to health and safety, office balustrades on roof terraces are often higher than this – these elements should be clarified.

#### Design (Eastern End of Plot 1)

7.31 This part of the proposed building is within LB Tower Hamlets (shown in figure 8 and appendix 1.6). Officers would have liked an opportunity to review and discuss the design and layout of this section of the building in greater detail at pre-application stage. The structural piers whilst reflected between the upper and lower sections of the building, are top heavy, with the width of the structure at the top of the building extending beyond the dimensions of the lower brick piers. Ideally the structure to the top half of the building would be lighter in appearance.

- 7.32 Reference is made in the Design Guide (page 42) to the intention for spandrels to have a red hue to tie in with the western section of the building, but this is not shown in the visualisations (see figure 8). Officers question whether the combination of a black metal structure combined with red spandrel panels would make this section of the building appear overly fussy and draw additional attention to the top heaviness of the upper parts of the building. Officer preference is for the spandrels to have a grey or black hue as depicted in the current CGIs. If red spandrels are proposed, it would be helpful to see its appearance in a CGI and assess its visual impact on the façade. The CGI could also show the visual impact of using a dark unitised metal curtain wall panel.
- 7.33 An extensive section of the plinth below the link building to both north and south elevations is windowless. Whilst nicely detailed, it would nonetheless be an improvement to include windows within these elevations. On the southern façade (see appendix 1.3), it is also worth noting that much of the plinth façade adjoining the railway box is a series of louvres, making this a fairly forbidding elevation. A strategy of how this will be enlivened should be provided, possibly including the use of decorative grilles.



Figure 8: View from Bethnal Green Road from the east towards proposed development. Plot 4 is to the left/east

- 7.34 The 19/11/2020 Tower Hamlets Strategic Development Committee resolved to raise objections to the hybrid consent application in relation to *'the height and massing of the development, particularly in terms of the impact on Bethnal Green Road.'* The related committee report further

stated that: *'To be successful, the development of Plot 1 would likely need to be limited to little more than the minimum parameters set out in the Design Guide. Any proposals coming forward will also need to be very carefully articulated and detailed to help minimise the apparent scale to the eye.'*

- 7.35 *'Plots 1 and 4 would form a new street frontage along the far western end of Bethnal Green Road, incorporating the retained single storey historic wall and replacing the temporary Box Park retail units. It is evident from the information submitted in support of the application that the buildings that could come forward on these plots could form a dominant and imposing wall of development as there is a very limited amount of proposed modulation in the principal building line or variation in the overall height of the individual buildings.'*
- 7.36 After the above representations were provide from LB Tower Hamlets, the proposals were subsequently approved by the GLA who concluded that they would result in a *'successful design with an acceptable visual impact.'* Figure 8 and appendix 1.10 show the proposed development in relation to Bethnal Green Road. **Officers remain concerned and raise objection with the visual impacts to Bethnal Green Road and retain the view that the bulk and massing should be reduced within LB Tower Hamlets towards the minimum parameters (as illustrated on figure 5) – this would also aid in response to related issues raised later in regard to 'Station Square' and amenity of future homes.**

#### Design (Western End of Plot 1)

- 7.37 This part of the proposed building (shown in appendix 1.1) is within LB Hackney, although it helps to form a gateway (along with the Tea Building) to Bethnal Green Road and LB Tower Hamlets. The proposals include a top to the building with two sets of horizontal steelworks spaced a floor apart rather than the double storey grid on the middle section of the building, this is insufficiently distinguished if the intention is that it should be read as a crown. It appears cluttered and confused, with terrace balustrades appearing to extend beyond the structure at one end which fail to reach the structure at the other end. The possibility that balustrades will also need to be higher exists and the impact of this upon the appearance needs to be considered.

#### Public Realm/ 'Station Square'

- 7.38 The Landscape and Public Realm Strategy includes high level information about the applicant's approach to lighting around the site and refers to the Hoard Lea Stage 2 report for more detailed information – the Hoard Lee report and a lighting plan were not included in the proposal; therefore officers are unable to fully assess. This information should be provided at this stage for officer comment. The ground floor proposed landscaping for Plot 1 is shown in appendix 1.7.
- 7.39 Across the proposals, consideration needs to be given to passive surveillance, and the illumination of corners in relation to potential anti-social behaviour. In particular, the diagonal building footprint around Braithwaite Street creates an odd corner which could attract anti-social behaviour. On the western end within LB Hackney, it appears that it would it be beneficial to have more passive surveillance from windows around this space.
- 7.40 Figure 9 shows the proposed 'Station Square,' within LB Tower Hamlets on Braithwaite Street. Three sets of bollards are proposed around the eastern end of the building on Braithwaite Street – on both sides of Middle Road (the west-east route) and to the south just before the Overground viaduct. It is assumed that these are hostile vehicle mitigation measures – pedestrian desire lines should be considered in the final HVM strategy. Officers would need to see the final HVM strategy at this stage in order to be able to fully assess public realm proposals and ensure minimal clutter along with necessary security measures. If the HVM strategy cannot be provided at this stage then it should be secured by condition.

- 7.41 Appendix 1.4 illustrates the Design Guide section relating to 'Station Square' which states that *'increased public space will be provided at the north-east corner of the plot (between Bethnal Green Road and Shoreditch High Street. This will ensure adequate and appropriate public realm is delivered in this potentially busy location.'* The Design Guide further describes that this *'will be achieved'* by either building to the minimum parameter extents (shown in blue outline on appendix 1.8), introducing a cantilevered recess or introducing a colonnade when building to the maximum parameter.
- 7.42 As shown in figure 7 and figure 9, the proposal involves extending to the maximum parameter of both building footprint and massing. The proposal would not introduce a cantilevered recess. As shown in figure 9, no additional public realm would be provided although it appears that pedestrians could potentially cut through/ past the corner retail unit (marked as number 2) – this would not constitute an adequate colonnade space. It is understood that this space would be shuttered at night to prevent anti-social behaviour – the principle of closing such a space at night is supported, however the space itself is wholly unacceptable. Any cantilevered or colonnade space would require full details of management strategy, process of activation (through elements such as lighting, public art and incorporating retail frontages) and the use of decorative and bespoke detailing to be secured by condition.

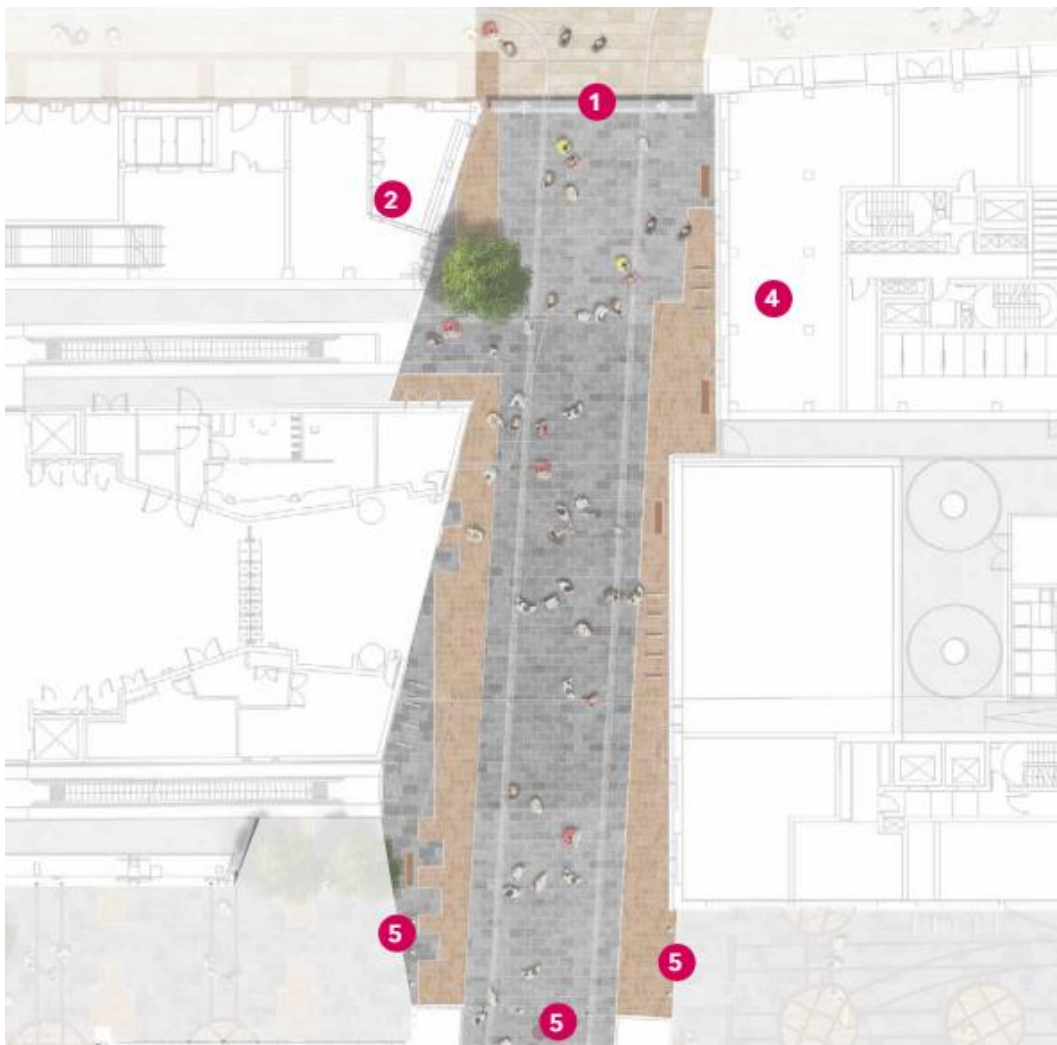


Figure 9: Proposed 'Station Square.' 1 is the overhanging gantry; 2 is retail frontage within an enclosed area; 4 is retail frontage to Plot 4; 5 is bollards;

- 7.43 The proposed 'Station Square,' with no additional public realm would not practically constitute a 'square' and figure 8 and figure 10 show that it would appear 'hemmed-in' by Plot 1 and Plot 4 tall building development on each side. The proposal also goes against the Site Allocation



aspirations (shown in figure 6) for a public square and increased public realm at this location. The proposal would be contrary to the Design Guide, as shown in appendix 1.4.

- 7.44 Appendix 1.2 shows the existing situation around Shoreditch High Street, whereby BOXPARK is setback to allow some public realm, open space and relief towards the station approach. This layout also allows the Shoreditch High Street station totem and signage on the viaduct to be clearly visible to passers-by on Bethnal Green Road. Building out to the maximum parameter massing at the eastern end has obscured the presence of the Overground station and fails to provide any meaningful public realm to improve the situation.
- 7.45 Further to above, bollards on Braithwaite Street (shown as number 5 on figure 9) should be minimalised and rationalised. Folding or lowerable bollards should be moved to the northern threshold, underneath where the gantry is shown (number 1), which would create an improved, relaxed pedestrian zone on the approach to Shoreditch High Street station, whilst still allowing emergency vehicle access.
- 7.46 **Officers raise objection to the proposed 'Station Square' and recommend that the building footprint and massing is reduced to the minimum parameter extent at this location in order to ensure that adequate public realm is provided at this key, busy pedestrian junction within LB Tower Hamlets, allowing relief to the approach which does not feel that it is overborne by development.**

#### Shopfronts

- 7.47 Page 46 of the Design Overview Statement indicates that the north elevation retail facades will have a signage zone in the fanlight and an additional externally mounted signage zone on the brickwork above the arches. To reduce visual clutter and create a consistent signage zone, the applicant should decide whether the signage will be in the arched fanlight or on the brickwork above the arches. If mounted on the brickwork, the applicant should clearly define the signage zone. Signage needs to be consistently located; consequently, a decision must be made about where the signs should be placed at this stage. Officer preference is for signage to be in the fanlight on the north elevation.
- 7.48 On the south façade, the shopfront frameworks work well. The framework provides a modern interpretation of an historic shopfront, which helps to define the rhythm, break up the elevation and create clearly defined well-proportioned units. They have an industrial appearance which reflects the Goods Yard's history, and ventilation requirements are masked with a decorative mesh. The opportunity exists for awnings with the boxes concealed within the structure. However, the signage zone needs to be marked consistently rather than varying in location between the top of the beam and the bottom. On the ground floor, signage is also shown to the side of the door, this is not desirable. Overall, the shopfront strategy should be rationalised in line with the above at this stage.
- 7.49 Pop-up uses with PPC framed glazing located beneath the station are referred to, but it is unclear where these are located. The key on the south elevation plan shows retractable louvred gates to the adaptable retail areas. A bespoke, decorative approach should be taken to these areas.



Figure 10: Image showing proposed access to Braithwaite Street/ Shoreditch High Street station from Bethnal Green Road. Plot 1 is to the right/ west. Plot 4 is to the left/ east

### Signage

- 7.50 Figure 10 shows the proposed approach to Braithwaite Street ('Station Square'). This image shows an overhanging gantry announcing 'Bishopsgate Goodsyard.' As the proposed buildings obscure the station entrance, they make the station less legible and harder to find. Officers consider that if such a gantry is proposed then it needs to announce the Overground station appropriately, potentially including specific Overground signage, to aid legibility satisfactorily. Earlier CGIs of signage in this location showed a more integrated industrial form of signage which was preferable to the standalone signage that is now proposed.

### Impact on Heritage Assets

- 7.51 The hybrid planning permission tested the maximum parameter massing of Plot 1 and the wider site against surrounding heritage assets, local and strategic views and was found to be acceptable and in accordance with Development Plan policies. The submitted Environmental Compliance Report has included a Townscape and Visual Impact Addendum, as well as a Built Heritage chapter – the conclusions at the time of the hybrid planning consent have not significantly altered and the impact on heritage assets is still acceptable. Conditions related to on-site above and below ground heritage assets were secured in the hybrid planning consent.

### Fire Safety

- 7.52 The hybrid planning permission included a pre-commencement condition to secure submission of a fire strategy for each relevant phase.

### Designing-out Crime

- 7.53 The hybrid planning permission included a condition to secure submission of Secured by Design details prior to completion of superstructure for each relevant phase or building.

### Design and Heritage Conclusion

- 7.54 In conclusion, officers recommend a number of clarifications are provided and specifically object to the massing of the development at the eastern end and the proposals for 'Station Square.'

### **NEIGHBOUR AMENITY**

- 7.55 The hybrid planning permission tested the maximum parameter massing of Plot 1 and the wider site in relation to its impact on neighbour amenity in relation to Development Plan policies and was found to be acceptable on balance.

### Outlook, Overbearingness, Sense of Enclosure and Privacy

- 7.56 Within the SDC report dated 19/11/2020 and the GLA representation hearing report dated 03/12/2020, no specific concerns were raised in regard to the impacts of the Plot 1 building in particular. The nearest residential units to Plot 1 would appear to be those marked on figure 11 on Shoreditch High Street (number 1), Chance Street (number 2) and Bethnal Green Road (number 3) in relation to the site (marked with a red asterix). The separation distance across public roads, to nearby residential buildings is significantly in excess of the 18m guideline, therefore the impact on overlooking and privacy would be acceptable. The height of the proposed buildings would result in an increased sense of enclosure, some loss of outlook and overbearingness, however this is considered to be acceptable, taking into consideration the limited residential presence nearby and separation distances.
- 7.57 In regard to future residential buildings on the wider consented development site (Plot 4, Plot 8 and Plot 10), when RMAs come forward involving these plots, special attention will need to be given to ensuring that there would no unacceptable mutual overlooking, privacy, sense of enclosure, outlook or overbearingness. These future residential plots are within LB Tower Hamlets. At its nearest point, Plot 4 (residential) would be only 13.6m from the Plot 1 office building. Plot 8A (residential) would be only 11.9m from the Plot 1 office building (relationship shown in appendix 1.5). Plot 4 and Plot 8A are limited in being able to move further away from Plot 1 in parameter building footprint terms, however Plot 1 is able to reduce its building footprint more towards the minimum parameters in order to increase separation distances to Plot 4 and Plot 8A. Officers consider that the limited separations distances from eastern elevation massing of Plot 1 towards the residential Plot 4 and Plot 8A, with the presence of the office terraces and substantial glazed facades would lead to unacceptable mutual overlooking, lack of adequate privacy, sense of enclosure, outlook and overbearingness. Officers therefore consider that the massing of the Plot 1 building needs to be pulled inwards at the east in order to provide acceptable conditions for future residential occupants.

### Daylight, Sunlight & Overshadowing

- 7.58 An Environmental Compliance Report (Daylight, Sunlight and Overshadowing) was submitted with the RMA, which will be reviewed by GLA officers. The hybrid planning permission application contained extensive daylight, sunlight and overshadowing assessments and review within the Environmental Statement. Within the SDC report dated 19/11/2020 and the GLA representation hearing report dated 03/12/2020, no specific concerns were raised in regard to the impacts of the Plot 1 building in particular.
- 7.59 As mentioned above, the nearest residential units to Plot 1 appear to be those shown on figure 11. Major adverse impacts to daylight and sunlight were attributed to these existing homes. For 28-30 Bethnal Green Road, it would appear that impacts would mainly arise from the interaction with Plot 4 and Plot 5 rather than Plot 1 which is further away. For 2-4 Chance Street, it was factored in that this second floor property had low existing levels and was self-restricted by its

overhanging roof. For properties on Shoreditch High Street, the retained levels were found to be appropriate even though the losses were significant.

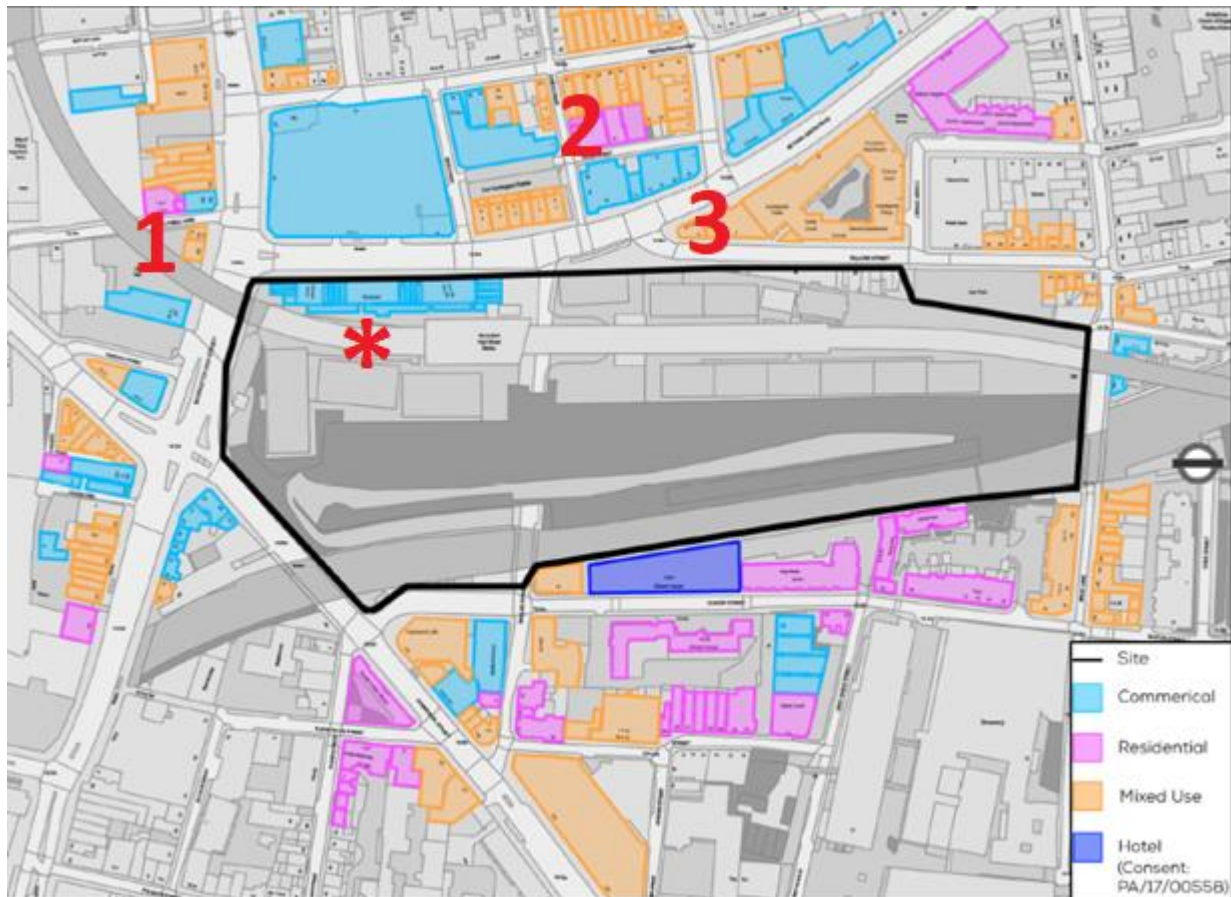


Figure 11: Image showing surrounding land uses (residential in pink)

- 7.60 In terms of overshadowing, the main impact of Plot 1 would be on the Shoreditch House rooftop swimming pool and adjoining terrace to the north. These areas would experience significant impacts on sunlight; however it was concluded that as these are not residential spaces, and they would still be well lit in summer months, the impacts would be acceptable.
- 7.61 Overall, there would be limited significant impacts on daylight, sunlight and overshadowing to nearby existing residential properties. Taking into consideration the officer recommendation to scale back the eastern massing of Plot 1 above, this would also help in improving internal daylight and sunlight levels to future residential units in Plot 4, Plot 8A and Plot 10.

#### Light Pollution

- 7.62 The hybrid planning permission application contained a condition for full details of internal lighting to be provided and controlled for the Plot 3 office building in relation to nearby residential units. Officers consider that such a condition should be imposed on the Plot 1 building in relation to the close proximity of future residential units of Plot 4, Plot 8A and Plot 10.

#### Noise

- 7.63 An Environmental Compliance Report (Noise and Vibration) was submitted with the RMA, which will be reviewed by GLA officers. The hybrid planning permission application contained appropriate noise testing and review within the Environmental Statement and a number of conditions controlling noise and ensuring sound insulation to residential properties have been imposed in accordance with Development Plan policies.

### Amenity Conclusion

- 7.64 Officers consider that the impact of the proposed development on existing surrounding uses would generally be acceptable. **In regard to the impact on future residential Plot 4, Plot 8A and Plot 10 of the hybrid planning permission, officers consider that the combination of Plot 1 massing, bulk, close proximity, as well as office lighting to these buildings would result in significant adverse impacts. Officers therefore raise objections in relation to the impact on future residential properties and recommend reduction of building footprint and massing towards the minimum parameter around the east of Plot 1.**

### **HIGHWAYS AND SERVICING**

- 7.65 An Environmental Compliance Report (Traffic and Movement) and Transport Assessment was submitted with the RMA, which will be reviewed by GLA officers, who are required to consult TfL. LBTH Highways team have also provided comments on the submission. The hybrid planning permission application contained appropriate testing and review within the Environmental Statement and a number of conditions and legal obligations controlling servicing, car parking (including accessible), cycle parking, cycle hire docking stations, electric vehicle charging, highways improvements, construction management, Shoreditch High Street station improvements and safeguarding, infrastructure protection, travel plans, waste collection and management have been imposed in accordance with Development Plan policies.

### Car and Cycle Parking

- 7.66 No accessible car parking bays are proposed on the Plot 1 site, which could lead to Sclater Street being over-utilised to provide the requirement, which is not sustainable. Sclater Street is a fairly narrow two-way street with car parking on the south side and, according to the applicant, servicing on the north side. It is not reasonable, given the size of this development to put so much reliance on the public highway for its impacts. Cycle parking generally accords with the hybrid planning permission; however the cycle stores appear to be overly large and from a security viewpoint would be better split into small units.

### Servicing

- 7.67 It is proposed to lower the headroom on vehicles using the Bethnal Green Road service yard within Plot 1 (see appendix 1.8) from 4.5m to 4.2m – the GLA should ensure that this is reflected in the service management plan (secured by s106 legal agreement) or otherwise by condition, with restrictions put on the type of service vehicles to ensure no over-height vehicles attend the site and then need to either reverse out to the public highway.
- 7.68 Emergency vehicle access appears to have changed from the hybrid planning permission and it is now proposed to use Braithwaite Street on Plot 1. Braithwaite Street is closed to through traffic and during pre-application/ hybrid application discussions it was made clear that LB Tower Hamlets do not wish to open this up to traffic again, creating a rat run into other borough roads – it is now a well-established safe pedestrian and cycling route. Further clarification should be provided on this change – if London Fire Brigade (LFB) has requested this change then officers would need to see that advice, otherwise this is not supported. If LFB have requested this then the applicant needs to formulate a mechanism for allowing **only** emergency service vehicles whilst prohibiting all other vehicles – signage alone would not work.
- 7.69 A proposed entry 'arch' is proposed over Braithwaite Street (see figure 10), which is public highway. In terms of wayfinding towards the site, officers consider this unnecessary. Should the applicant wish to provide such signage it should be provided within their own land – the Local Highways Authority does not approve this element. Any wayfinding around this area should be directed towards Shoreditch High Street station.

## Waste

- 7.70 The RMA provides a mix of non-residential use classes. These use classes have been spread throughout the plot and are located within both the LB Hackney and LB Tower Hamlets parts of the site. Due to the clear restriction in height for the Plot 1 servicing yard, waste management solutions such as portable compactors could not be explored hence the option of waste storage in a dedicated bin store. The waste storage area within the Plot 1 servicing yard has been designed to accommodate the number of bins required for a daily collection, and a worst-case approach provided across all non-residential units – this is acceptable.
- 7.71 Operationally, the applicant has stated that the waste arising from the office uses will be brought to the central waste store via the service lifts daily with the support of internal management team. The submission states that Plot 1 waste will be collected directly from the waste store daily. Whilst LB Tower Hamlets does not have a responsibility to collect commercial waste, the proposed daily collection is acceptable as increased frequency of collections can be arranged. Whilst it is stated that waste will be collected from within the Plot 1 service yard by a private waste contractor, as an informative it is required that the applicant explores waste services providers that can support the available and restrictive space within the service yard to manoeuvre. Officers will not support any servicing or waste collections from the main road – Bethnal Green Road/ Shoreditch High Street.

## **ENVIRONMENT**

- 7.72 An Environmental Compliance Report (including chapters on Climate Change, Air Quality, Wind Microclimate, Preliminary Ecological Appraisal, Bat Survey, Contaminated Land), Energy Strategy Addendum, Sustainability Statement, Circular Economy Statement and Air Quality Positive Statement, was submitted with the RMA, which will be reviewed by GLA officers, who have their own specialist consultees.
- 7.73 The hybrid planning permission application contained appropriate testing and review within the Environmental Statement and a number of conditions controlling air quality positivity, air quality monitoring, air source heat pumps, bat and bird boxes, sustainability strategy, BREEAM certification, green/brown roofs and green walls, landscape and ecological management plan, urban greening factor, land contamination, circular economy statement, whole life carbon, water efficiency, photovoltaics, sustainable drainage, water capacity, energy strategy, mechanical ventilation were imposed in accordance with Development Plan policies.

## Biodiversity and Arboriculture

- 7.74 A Biodiversity Gain Plan has been provided which states that the proposed development will provide a 261% increase in biodiversity on the Plot 1 site, through the introduction of biodiverse roofs and trees. A condition was imposed to ensure that a site-wide Urban Greening Factor score of 0.3 is achieved. London Plan policy G5 states that predominantly commercial developments should meet the Urban Greening Factor target score of 0.3 in regard to the quality and proportion of urban greening proposed. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.21 for Plot 1. Officers consider that a review of Plot 1 site greening should be requested in order to maximise trees around the perimeter of the building within the public realm and to integrate biodiverse roofs with proposed roof plant/ photovoltaics in order increase the UGF.
- 7.75 The proposals do not impact on or require the removal of any trees. Officers are generally satisfied with the tree species choices proposed in the Landscape and Public Realm Strategy, except Quercus Robur. The Council do not plant Quercus species in Tower Hamlets, as this is an Oak Processionary Moth (OPM) control zone. An alternative species which is native to the UK and with similar proportions would be preferable.

7.76 Planting locations appropriately consider post-development pressures, such as shade and litter once fully established, which should see them reach their intended proportions without the need for regular, heavy pruning and pressure from future residents and businesses to remove them. If the Quercus species is replaced with another species native to the UK, an important Local Biodiversity Action Plan (LBAP) target of planting a minimum of 3 tree species native to the UK will have been met – this is encouraged. The Council require submission of a tree planting methodology in line with BS 8545 describing the process for planting and maintaining young trees that will result in them successfully establishing in the landscape – this should be secured by condition.

## 8. RECOMMENDATION

8.1 Officers recommend that the following objections to the RMA are raised with the GLA:

- The 'Station Square' is not in accordance with the Design Guide and Site Allocation aspirations for additional public realm and a public square in the key, busy pedestrian approach to Shoreditch High Street station. The building massing/ footprint should be reduced to the minimum parameter extent at this location in order to provide the necessary additional public realm promised by the Design Guide
- The close proximity of the eastern end of the proposed Plot 1 building to future residential Plot 4, Plot 8A and Plot 10 would result in unacceptable mutual overlooking and poor levels of privacy to the new housing on the wider site. Taken into consideration with the concerns raised with the excessive visual impact of proposed built massing on Bethnal Green Road, Plot 1 should be reduced to the minimum parameter extent at the eastern end of the building

8.2 Officers recommend that the following comments on the RMA are raised with the GLA:

- Rationalisation between plans and visualisations to confirm design intentions particularly in respect of doors to internal Plot 1 walkway, balustrades to terraces, western stairs off 'Middle Road,' gantry over Braithwaite Street, clarification of material number 10
- Servicing yard entrance off Bethnal Green should be better visually integrated into the proposed building in line with Design Guide and clarification on gate treatment
- Review of soffits to balconies and terraces including potential integration of public art
- Review of design of the eastern elevation to look at lightening the top part of the building with clarification on colours of structure in relation to spandrel panels
- Review of north and south elevations windowless parts of the building to look at better activation of facades including strategy of enlivening southern louvres to be secured
- Provision of further lighting details, including Hoard Lee report
- Review of gantry over Braithwaite Street to ensure that Shoreditch High Street station is well-signposted and that this space is not cluttered
- Provision of HVM strategy for site including rationalisation and minimisation of bollards around Braithwaite Street with bollards on threshold with Bethnal Green Road to provide a better pedestrian environment in the approach to Shoreditch High Street station
- Provision of consistent shopfront signage strategy to be secured, minimising visual clutter
- Clarification on pop-up uses and that these will be treated with sufficient high quality detailing
- Condition to be imposed, securing full details of how internal lighting of Plot 1 offices will be controlled in relation to future residential units of Plot 4, Plot 8A and Plot 10.
- Review of accessible car parking provision on-site to ensure that Sclater Street is not over-utilised

- Clarification on servicing strategy in relation to Bethnal Green Road servicing yard height restriction and emergency vehicle access on Braithwaite Street
- Review of proposed trees (including removal of Quercus Robur) around the site to maximise provision around the public realm and around an increased 'Station Square.'  
Review of roof plant area to incorporate biodiverse roofs to increase UGF to 0.3



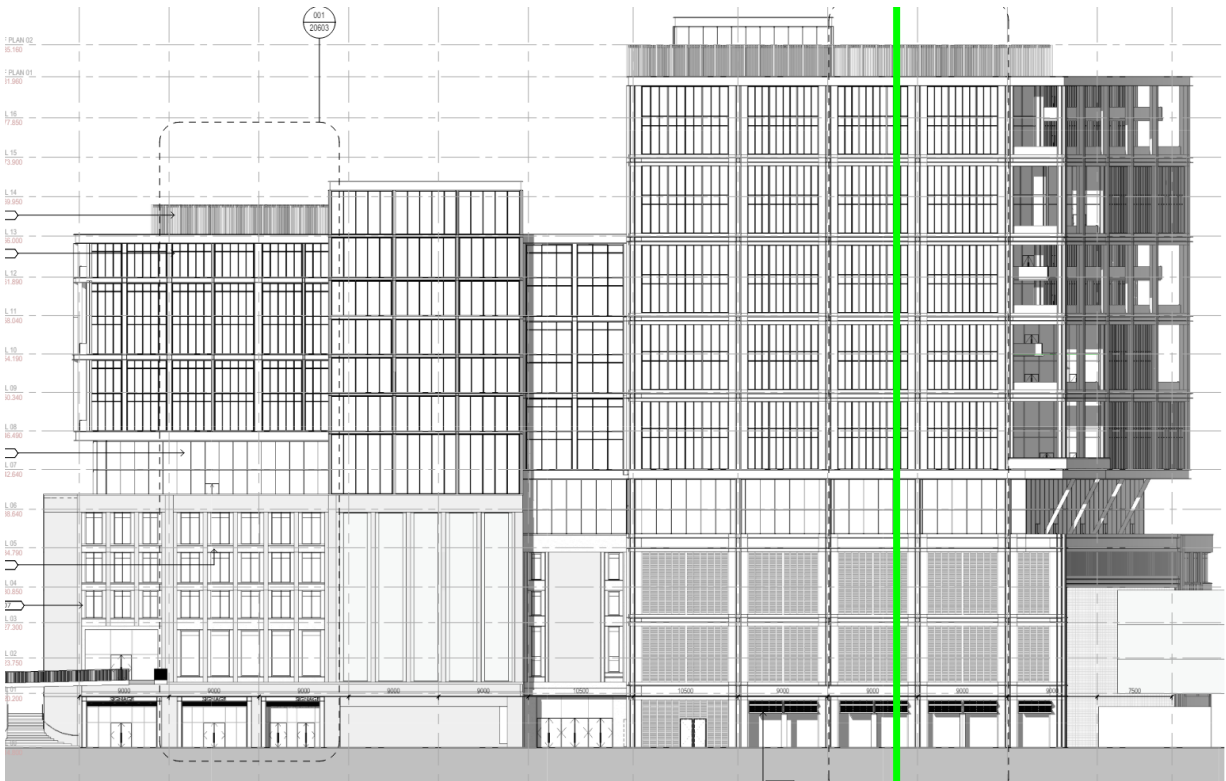
## APPENDIX 1: Selection of Plans and Images



Appendix 1.1: Visual of Plot 1 (marked with red arrow) to left/ north of Plot 2 (consented in detail)



Appendix 1.2: Existing view of approach to Shoreditch High Street station from Bethnal Green Road



Appendix 1.3: Proposed south elevation of Plot 1 (facing 'Middle Road') with LB Tower Hamlets to the right/ east of green line

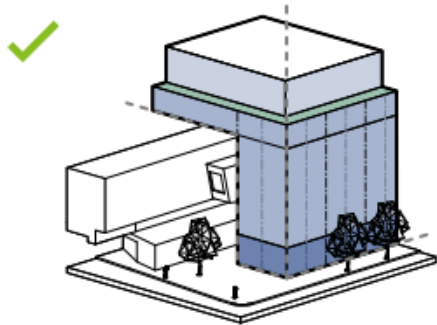


Fig 4.4.19: Acceptable: Northeast corner achieving public space through the minimum parameter

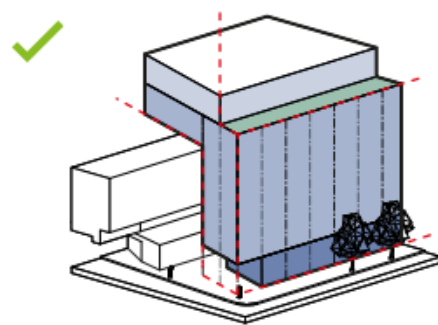


Fig 4.4.20: Acceptable: Northeast corner achieving public space through the maximum parameter (cantilevered recess)

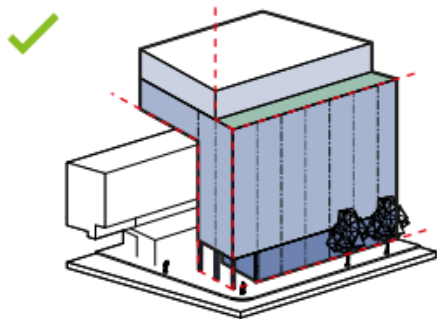


Fig 4.4.21: Acceptable: Northeast corner achieving public space through the maximum parameter (colonnade)

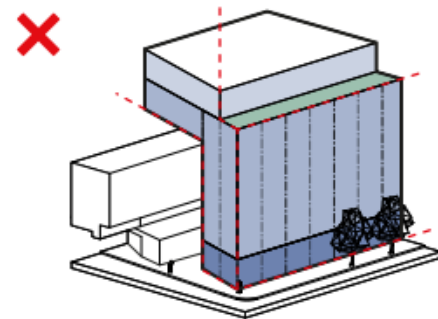
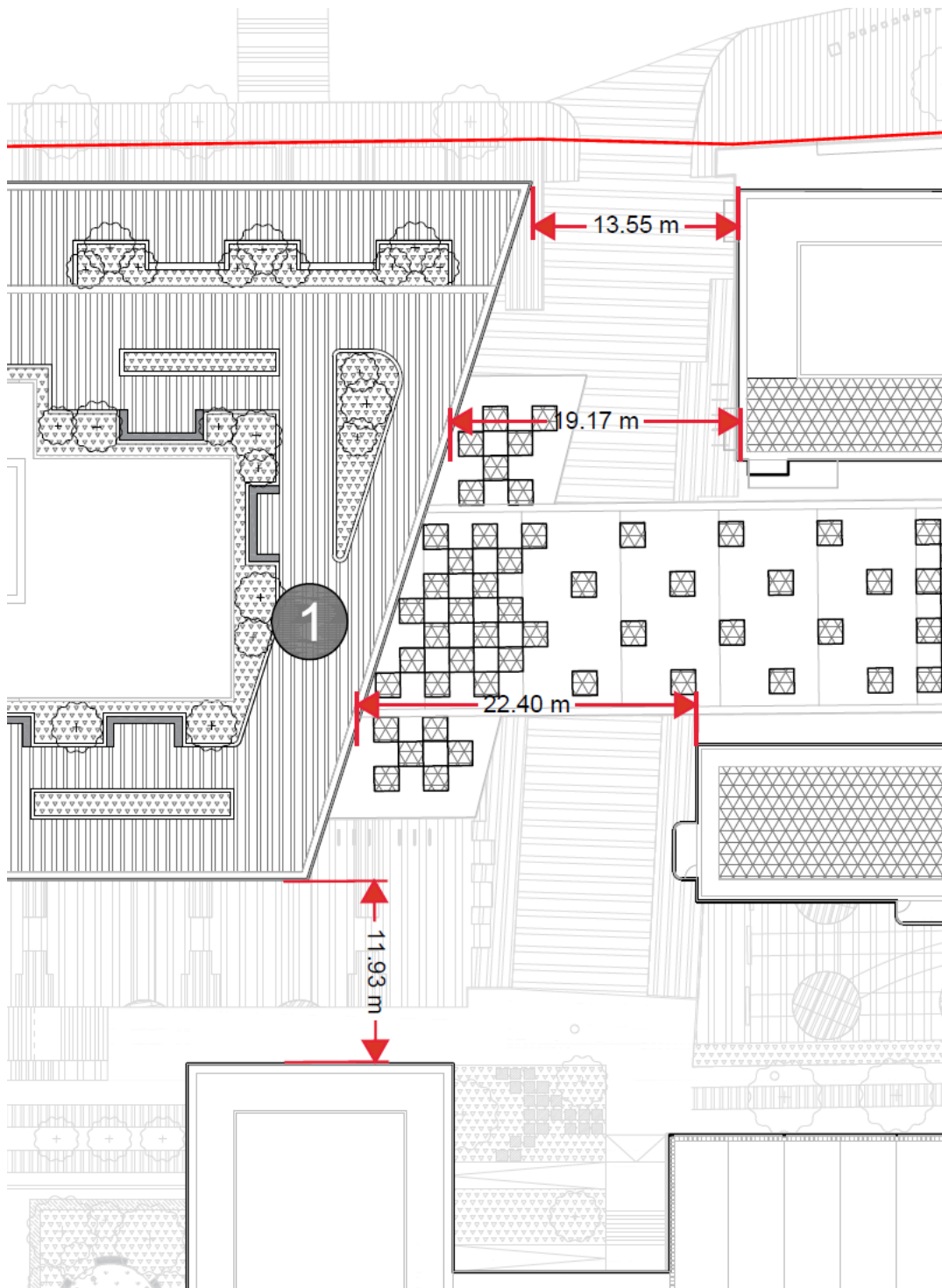
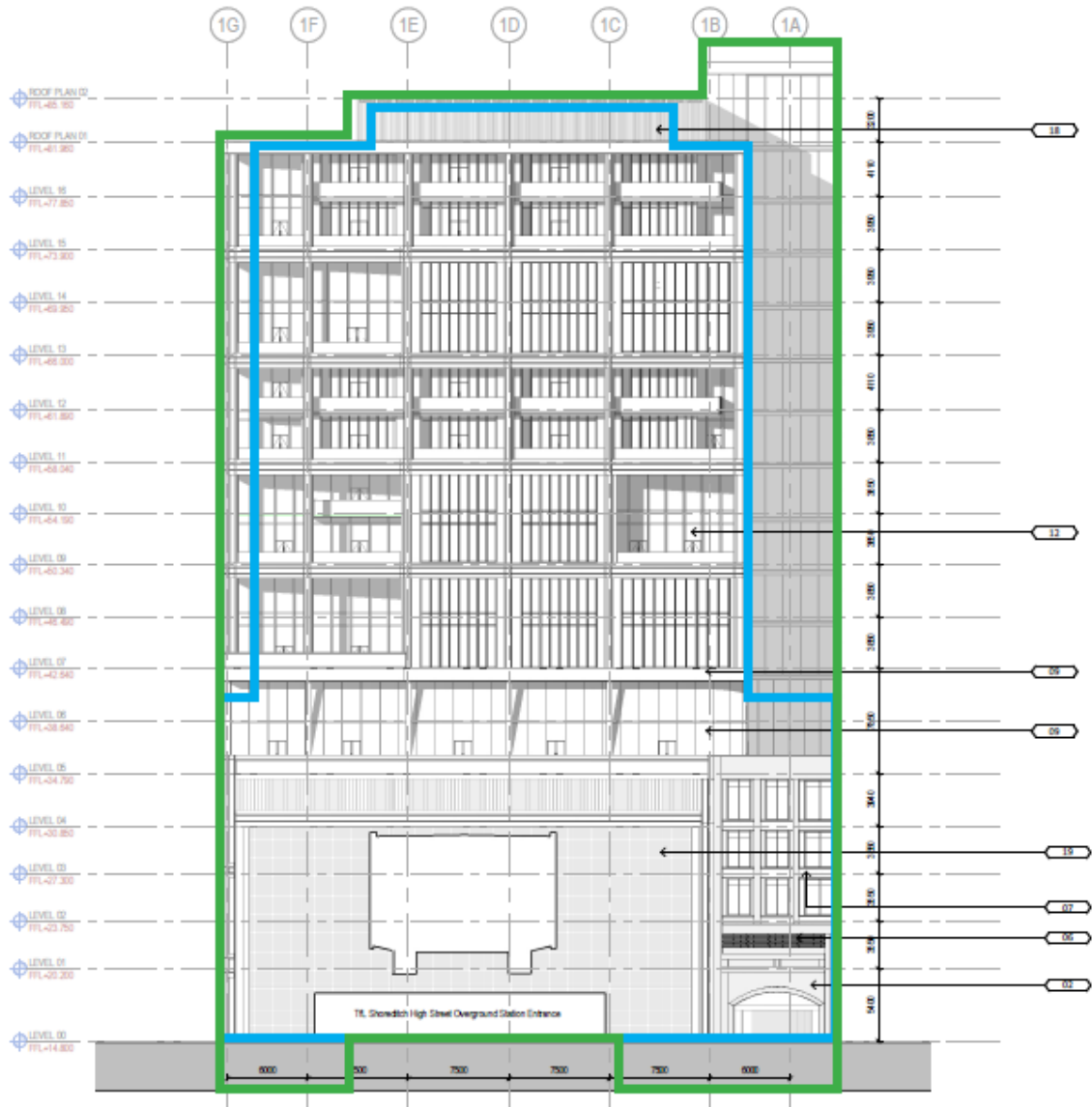


Fig 4.4.23: Unacceptable: Northeast corner building to the maximum parameter, no increased public space at grade.

Appendix 1.4: Guidance for 'Station Square' in Design Guide



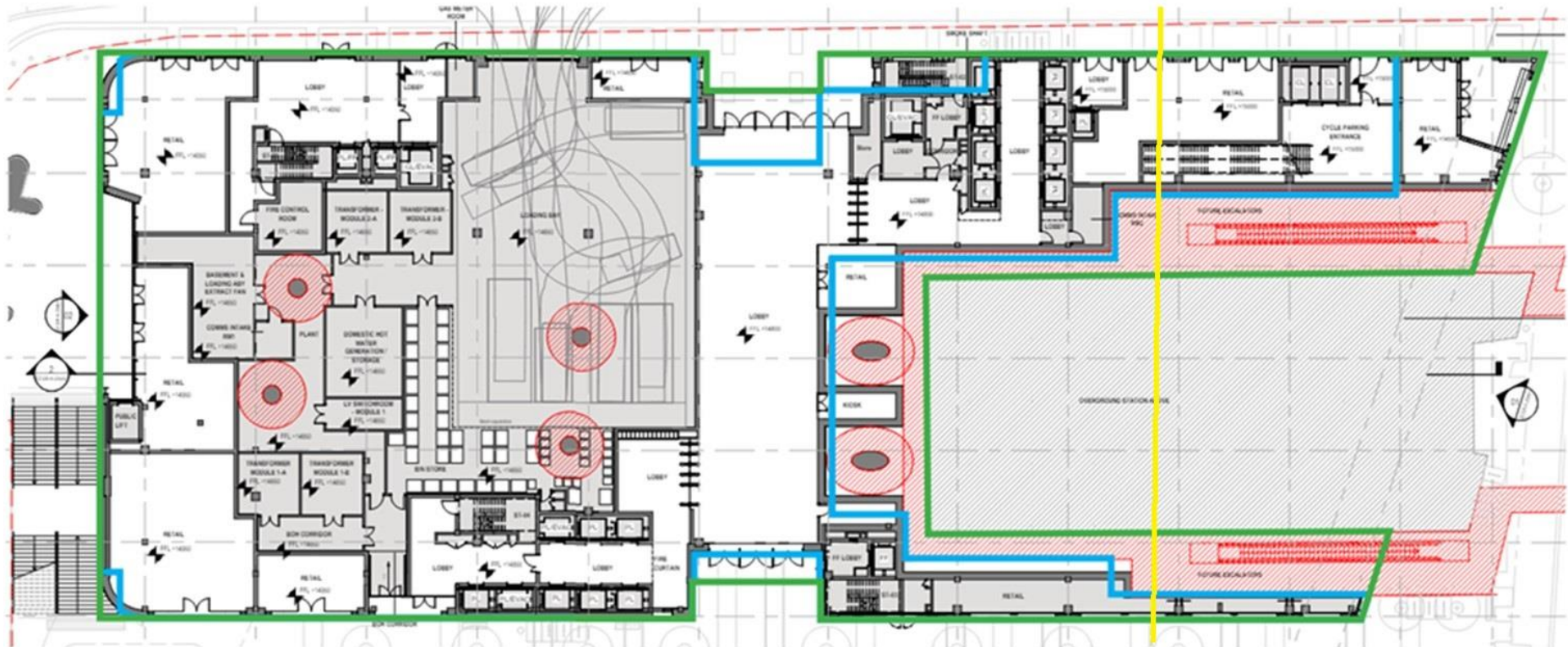
Appendix 1.5: Proposed roof plan showing separation distances between Plot 1 and future Plot 4, Plot 8A and Plot 10



Appendix 1.6: Proposed east elevation (within LB Tower Hamlets) showing minimum parameter massing in blue outline and maximum parameter massing in green outline

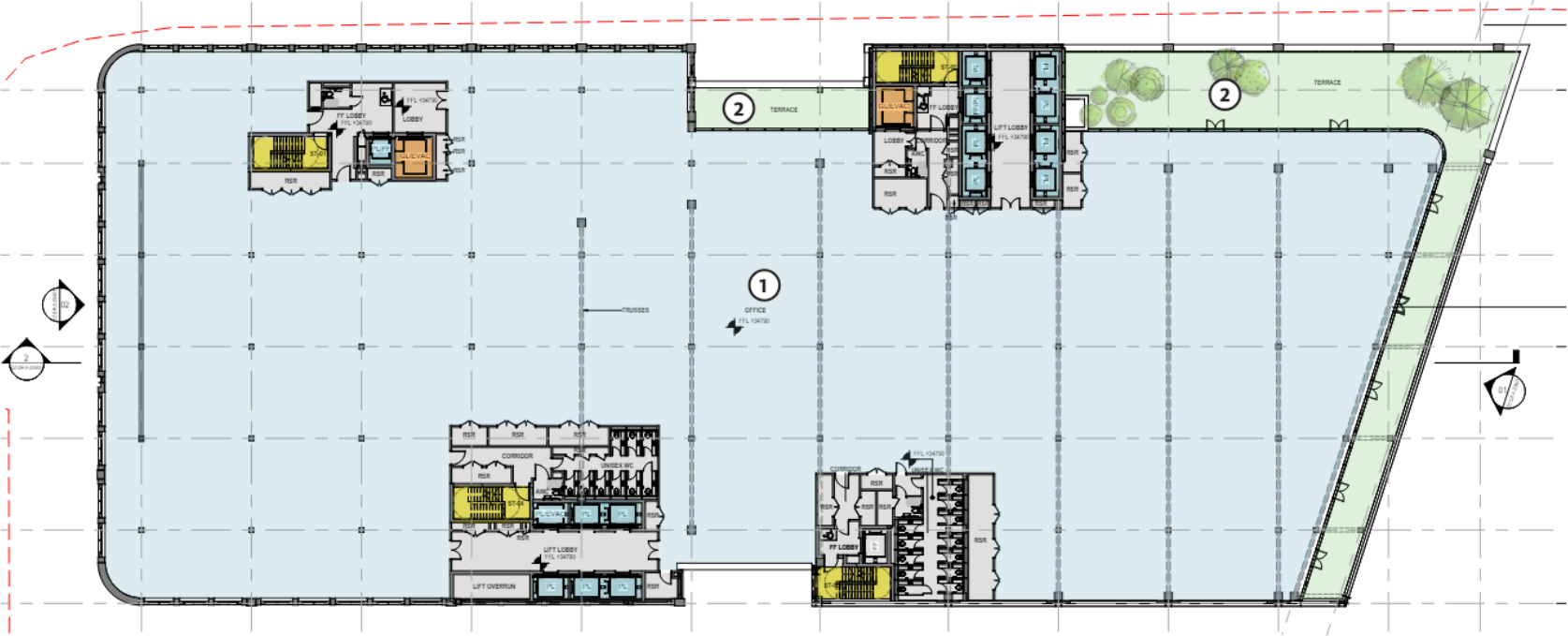


Appendix 1.7: Proposed ground floor landscaping plan for Plot 1



Appendix 1.8: Proposed ground floor plan with minimum parameter building footprint in blue outline and maximum parameter building footprint in green outline. LB Tower Hamlets is to the right/ east of yellow line

BETHNAL GREEN ROAD



MIDDLE ROAD

- ① Office
- ② Terrace
- Passenger Lift
- Goods Lift
- Stair

Appendix 1.9: Typical upper level office floor within Plot 1



Appendix 1.10: View along Bethnal Green Road from the east



## APPENDIX 2: DESIGN GUIDE CHECKLIST FOR PLOT 1

Clause	Description	design guide	compliant
4.4.1	<b>Use and Quantum</b> : Plot 1 will be a multi-layered, mixed use building made up of retail and office uses	page 14	✓
4.4.2	<b>Quantum of Uses</b> : The maximum and minimum areas by use class as identified on page 78.	page 78	✓
4.4.3	<b>The Ground Level</b> : The Ground floor level will be predominantly Retail (A uses), with servicing / ancillary, and Office (B1 use). An internal service yard is to be provided to support the building activities.	page 52	✓
4.4.4	<b>Plinth Levels</b> : Smaller scale, single aspect office space shall straddle either side of the London Overground.	page 54	✓
4.4.5	<b>Upper Levels</b> : The typical upper office plans should be double aspect and designed to be as open and flexible as possible. The design should allow the opportunity for atria spaces within the plan and particularly in the 'link' section between the east and west blocks.	page 56	✓
4.4.5	<b>Scale and Massing</b> : The building should respond to the influences of the Tea Building, in particular the parapet level at the junction with Shoreditch High Street. The top of the plinth level should not be at a lower level to the Tea Building parapet on the western block.	page 22, 80	✓
4.4.8	<b>Scale and Massing</b> : The building must have an urban design relationship with the Tea Building and not detract from the prominent corner of the Tea Building on the approach from the south.	page 80	✓
4.4.8	<b>Scale and Massing</b> : The building should not appear as continuous in length along the street. The 'link' between the blocks should not be solid at street level and should not appear in the same building line.	page 82	✓
4.4.9	<b>Constraints and Influences</b> : The building has to respect TFL constraints - The 2m exclusion zone in plan/section; Allow for exit/entrance to the station; Avoid the restriction zones associated with the structural footings; An additional zone will be left either side of the station entrance to allow further expansion of the station capacity with external escalators.	page 20, 21	✓

Clause	Description	design guide	compliant
4.4.14	<b>Articulated Form</b> : The building shall consist of 3 key elements, namely, a plinth with a defined base relating to the existing Boundary Wall on Sclater Street, a body and a link.	page 32	✓
4.4.10	<b>Heritage Interfaces</b> : The Plot parameter is set back from the identified heritage features (minimum 7.3m) to the west of the Plot. The building will address the increased public realm and provide animation to the street edge whilst respecting the adjacent listed structures.	page 26	✓
4.4.11	<b>Maximum and Minimums</b> : The building shall not exceed the maximum and minimum parameter extents in both vertical and horizontal direction.	page 81	✓
4.4.12	<b>Station Square</b> : Increased public space will be provided at the north east corner of the Plot. This will be achieved by either: Building to the minimum parameter extents; a cantilevered recess; or a colonnade		✓
4.4.13	<b>Set-Backs</b> : Setbacks shall be the following minimum sizes and accord to the parameter extents (North-3m;South-1m;East-3m;West-3m).	page 81	✓
4.4.14	<b>Articulated Form</b> : Both blocks should have dissimilar elements of their composition, namely plinth, body and crown.	page 32	✓
4.4.14	<b>Articulated Form</b> : The building must articulate a set back between plinth and body on all sides of the block and should not align the two elements, revealing break out space from the office use and defining the shoulder height of the plinth. A set back must be included on the western facade.	page 32, 81	✓
4.4.14	<b>Articulated Form</b> : If the building vertical circulation core is located at the perimeter of the plan it should not be solid in appearance.	page 69	✓
4.4.14	<b>Articulated Form</b> : If a crown is utilised, it shall be achieved by a shift in the fenestration arrangement and/or by a compositional shift in massing within the parameters, such that the top of the building has a lighter architectural expression than the main body.		N/A
4.4.14	<b>Articulated Form</b> : Any proposal that restricts the opportunity for roof terraces at upper levels shall not be supported.		✓
4.4.16	<b>Plinth Base</b> : The plinth shall incorporate a base and shall not be solid in appearance at street level, contributing to the animation of the ground plane on all sides.	page 77	✓
4.4.16	<b>Plinth Base</b> : The base of the plinth should touch the ground with consideration of the scale of the existing boundary wall to Sclater Street.	page 33, 36, 37	✓

Clause	Description	design guide	compliant
4.4.16	<b>Plinth Base</b> : Shop frontages will be fully glazed, within a masonry surround, with a consistent head detail where signage can be mounted.	page 35	✓
4.4.16	<b>Plinth Base</b> : Signage should be located in a consistent position on each shop front, but allow for a variety of designs on a common background. It should be visible from short and long distance and respond to unit use.	page 35	✓
4.4.17	<b>Plinth</b> : The plinth expression will be of robust masonry material in keeping with the historic wall and context.	page 33, 34, 38	✓
4.4.18	<b>Body</b> : The body element shall not be articulated as heavy in appearance and should have a clear fenestration distinction from the plinth upon which it sits. The body element shall integrate circulation cores where appropriate.	page 69, 71	✓
4.4.18	<b>Body</b> : Any external circulation core should not be expressed as a vertical solid but should be integrated into the architecture of its relevant block to minimise its impact from the street.	page 58, 71	✓
4.4.18	<b>Body</b> : The body element shall not appear flat or offer no depth or shading within its fenestration layout.	page 44, 45	✓
4.4.19	<b>Link</b> : Any link design that doe's not ensure a compositional split between the east and west blocks shall not be supported.	page 82	✓
4.4.19	<b>Link</b> : Any link design that doe's not ensure a compositional split between the east and west blocks shall not be supported.	page 82	✓
4.4.20	<b>Crown</b> : Should a crown be utilised, it shall not appear heavy in appearance. Any crown design that is not integrated into the building composition shall not be supported.		✓
4.4.20	<b>Crown</b> : Areas of roof mounted plant should be set well back and wrapped in a screen to limit visibility of the equipment.	page 80	N/A
4.4.21	<b>Service Access</b> : The service access into Plot 01 from Bethnal Green Road will be visually integrated into the proposed architecture.	page 35	✓
4.4.21	<b>Service Access</b> : The service access will be coordinated with the buildings structural grid and composition.	page 35, 52	✓
4.4.22	<b>Materiality</b> : The building will utilise a hierarchy of materials supporting the building composition.	page 38, 47	✓
4.4.22	<b>Materiality</b> : Changes in material must relate to building composition and/or architectural elements.	page 65, 66, 67, 68	✓

Clause	Description	design guide	compliant
4.4.22	<b>Materiality - Plinth</b> : The plinth and base of the building should be clad in masonry or high quality pre-cast concrete and portray a sense of solidity. Additional details, such as horizontal banding between ground and first floor, should be deployed to further emphasise links between the building and its context.	page 35, 36, 38	✓
4.4.22	<b>Materiality - Plinth</b> : Glazed openings shall be set back at an appropriate depth from the outer face to ensure a layered and visually interesting high quality facade.	page 43, 44, 67, 69	✓
4.4.22	<b>Materiality - Body</b> : The materiality of the body should have a visual commonality with the plinth. If a change in material is promoted it should have a similar colour palette	page 47	✓
4.4.22	<b>Materiality - Crown</b> : Should a crown be utilised the materiality should reduce the impact of the massing at the top of the building and appear lighter against the sky utilising visually lightweight materials and glazing.		N/A
4.4.24	<b>Pedestrian Access</b> : The primary building entrance should be integrated within the link between the building blocks and should be highly visible.	page 34, 35	✓
4.4.24	<b>Pedestrian Access</b> : The primary building entrance should not detract from retail opportunity along Bethnal Green Road.	page 35	✓
4.4.24	<b>Pedestrian Access</b> : The design should not preclude the opportunity for individual entrances to smaller office spaces within the plinth.	page 35	✓
4.4.25	<b>Service Access</b> : Plot 1 will be serviced at grade from within a dedicated service yard accessed via Bethnal Green Road.	page 52	✓
4.4.26	<b>Plant Strategy</b> : Roof mounted plant should be set well back and wrapped in a screen to limit visibility of the equipment.	page 57	✓
4.4.27	<b>MEP</b> : The building shall align with the SUDS attenuation strategy, which allows for the site to come forward in phases and supports a specific catchment area.		✓
4.4.27	<b>MEP</b> : Substations and LV rooms will be located at ground level with suitable access.	page 52	✓
4.4.28	<b>Maintenance Access</b> : Plot 1 is to support a roof mounted Building Maintenance Unit (BMU) access strategy and ensure that a 1.5m suspended access emergency landing zone is provided at grade.		✓
4.4.29	<b>Cycle Storage</b> : Plot 1 is to provide short stay and long stay spaces as defined by the Traffic Assessment. Long stay cycle storage is to be located within the building.	page 53	✓
4.4.29	<b>Cycle Storage</b> : Visitor cycle storage will be positioned externally within the public realm.	page 53	✓