



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

Reference	PA/22/00731
Site	4 & 5 Harbour Exchange Square, London, E14 9TQ
Ward	Blackwall and Cubitt Town
Proposal	<p>Demolition of existing building and erection of a mixed-use residential led building containing 450 residential units (Class C3) and new podium level to accommodate flexible retail, community, creative, and amenity uses (Class E and F2) as well as basement level blue-badge parking, new public realm and landscaping, and all associated works.</p> <p>This application is accompanied by an Environmental Statement.</p>
Summary Recommendation	Grant planning permission with conditions and planning obligations
Applicant	GAW Capital and City & Docklands
Architect/agent	Make Architects and DP9
Case Officer	Katie Cooke
Key dates	<ul style="list-style-type: none">- Application registered as valid on 16/05/2022- Revised plans received on 19/10/2022- Amended fire statement received on 25/10/2022- Based on additional environmental information received, officers carried out Reg 25 on 13/04/2023 which finished on 20/05/2023

EXECUTIVE SUMMARY

The application site falls within the Limeharbour Site Allocation, the Millwall Inner Dock Tall Building Zone and the Tower Hamlets Activity Area and is identified for housing and a range of employment floorspace. The application seeks demolition of the existing building and erection of a mixed-use residential led building containing 450 residential units and new podium level to accommodate flexible retail, community, creative, and amenity uses as well as basement level blue-badge parking, new public realm and landscaping, and all associated works. The scheme would provide 120 affordable homes, amounting to 35% by habitable room.

The development would provide a good standard of living accommodation, in terms of minimum floor space and floor to ceiling heights, outlook, aspect, access to natural light and private outdoor amenity space.

The Proposed Development would be 'car free' in accordance with local and strategic planning policy with no general car parking proposed for residents with additional only

disabled parking spaces delivered at basement level. The development would provide improved pedestrian connections across the site and deliver enhancements to the public realm.

The proposed development responds positively to its local context and has been designed in accordance with the principles of the Millwall Inner Dock Tall Building Zone. The height would respect the requirement for heights to step down from One Canada Square. The proposed tower would be well proportioned and would be of appropriately high architectural quality. The ground floor flexible retail, community and creative spaces would help to activate the public realm.

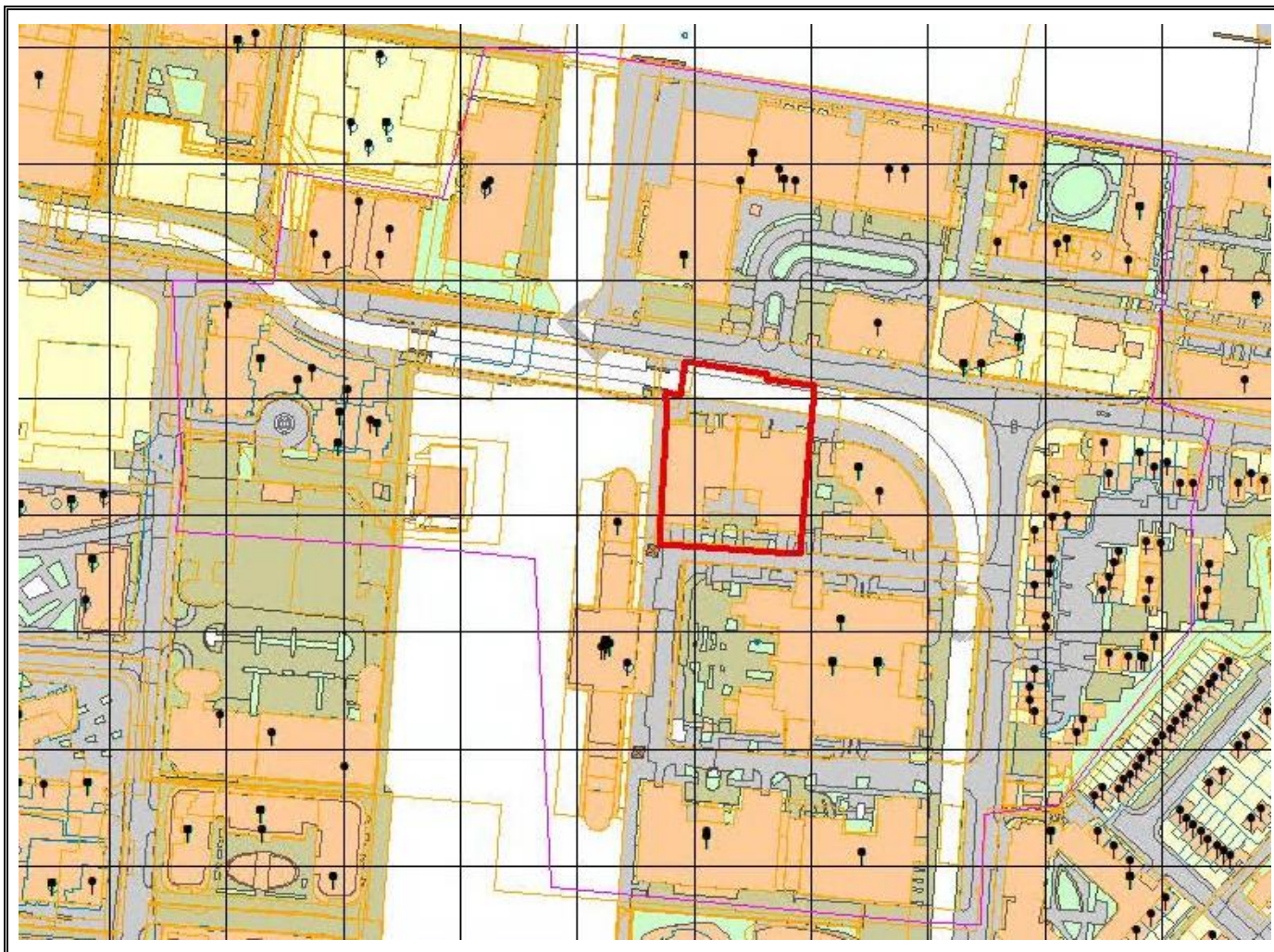
In terms of energy efficiency and climate change the development has been designed to minimise carbon dioxide emissions on site, with an additional carbon offsetting payment that would be secured as a planning obligation. The environmental impacts associated with the proposed development, as set out in detail in the Environmental Statement, have been fully considered in the recommendation. Any potential impacts that may arise from the construction or operation of the development can be sufficiently controlled and mitigated through the various recommended planning conditions and obligations.

In terms of fire safety, the application includes a Fire Statement which has been amended to address the concerns raised by HSE as part of the consultation process of this application.





The daylight, sunlight, and overshadowing assessment has considered existing residential properties and areas of amenity spaces in proximity to the Site. There is only one residential receptor within sufficient proximity of the Proposed Development – The Madison – and this is the focus of the assessment. The effect is considered Negligible to Minor Adverse (Not Significant) in terms of daylight and sunlight. Officers are satisfied that the scale and massing of the built form has been designed to minimise such impacts. Given its position, the application site mainly benefits from limited constraints in terms of privacy, outlook and sense of enclosure due to the dock to the west, and the DLR tracks and Marsh Wall to the north. It is not considered that there would be issues in terms of privacy and outlook as a result of the proposed development. Amenity impacts that arise would be proportionate and consistent with a tall building and high-density development in a location where such development is supported by planning policies.

Considered as a whole, the proposed development delivers the requirements of the Site Allocation and accords with the Development Plan. It would make a significant contribution to the delivery of the Council's housing targets and address the borough's identified housing need. The scheme would be liable for both the Mayor of London's and the Borough's Community Infrastructure Levy. In addition, several planning obligations would be secured relating to employment and skills training, carbon offsetting, and transport network improvements.

Overall, the proposal is considered to be well designed and generally complies with relevant development plan policies. It is on this basis that the grant of planning permission, subject to conditions and obligations is recommended.



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

Planning Applications Site Map PA/22/00731

This site map displays the Planning Application Site Boundary and the extent of the area within which neighbouring occupiers / owners were consulted as part of the Planning Application Process



**London Borough
of Tower Hamlets**

Scale : 50m grid squares

Date: 05 July 2024

1. SITE AND SURROUNDINGS

- 1.1 The application site is situated in the Isle of Dogs area and is bounded by Marsh Wall to the north, 3 Harbour Exchange Square to the east, and car parking and 1 Harbour Exchange Square to the south. To the east of the site is a public footway adjoining the Millwall Inner Dock, in which 10 Harbour Exchange Square is situated as a floating structure.
- 1.2 The site forms part of the wider Harbour Exchange Estate which are office buildings of the same character and with dark curtain wall office appearance. The wider surrounding area is mixed in use, with sites along Marsh Wall undergoing a significant redevelopment.
- 1.3 The existing application site contains two office buildings, 4 and 5 Harbour Exchange Square. Within the redline boundary is the adjacent DLR underline on Marsh Wall, immediately to the north of the existing office building.

- 1.4 In terms of planning designations, the application site sits within the Limeharbour Site Allocation, the Millwall Inner Dock Tall Building Zone and the Tower Hamlets Activity Area. To the north-west of the application site is the South Quay neighbourhood centre.
- 1.5 There are no significant heritage constraints. The site is not situated within a conservation area nor does it contain any listed structures. There are no listed buildings in the close proximity to the site. The site is within the Strategically Important Skyline Canary Wharf and forms part of a number of views within the London View Management Framework, including the one from the UNESCO's Maritime Greenwich World Heritage Site.
- 1.6 In terms of transport, the site is in an area of good access to public transport facilities with a Transport for London's PTAL (Public Transport Accessibility Level) of 4 on a scale of 1 (low) to 6 (high). The adjacent dock's edge includes an extension to the Council's Green Grid network. Accordingly, the site is included within the New Green Grid Buffer Zone.
- 1.7 With regards to environmental designations, the site is situated within the flood risk area, and the whole of the borough is within the Air Quality Management Area. Limeharbour and eastern parts of Marsh Wall are situated within an area of poor air quality. The adjacent Millwall Inner Dock is the Site of Importance for Nature Conservation.
- 1.8 The site sits within the GLA's Isle of Dogs and South Poplar Opportunity Area and the Isle of Dogs Neighbourhood Forum's Planning Area.

2. PROPOSAL

- 2.1 The proposed development includes the demolition of the existing office building and construction of a single tall building of 52 storeys (ground plus 51 storeys), as well as two basement levels. The proposed building would reach an AOD height of 175.75m.
- 2.2 The proposed development would include the following Use Classes:
 - Residential (Use Class C3): 44,590 sqm
 - Ancillary residential – amenity and play space: 2,588 sqm
 - Retail (Class E): 124 sqm
 - Restaurant (Class E): 627 sqm
 - Creative (Class F): 536 sqm
 - Community (Class E/F2): 284 sqm
 - Ancillary – plant, refuse, parking: 4,081 sqm.
- 2.3 The proposed building would be situated centrally within the application site, allowing for publicly accessible open spaces to be formed along the southern and western edges of the site, as well as along the northern edge on Marsh Wall. Along the eastern edge of the site would be a servicing and waste collection route, also serving as access to the cycle and car parking.

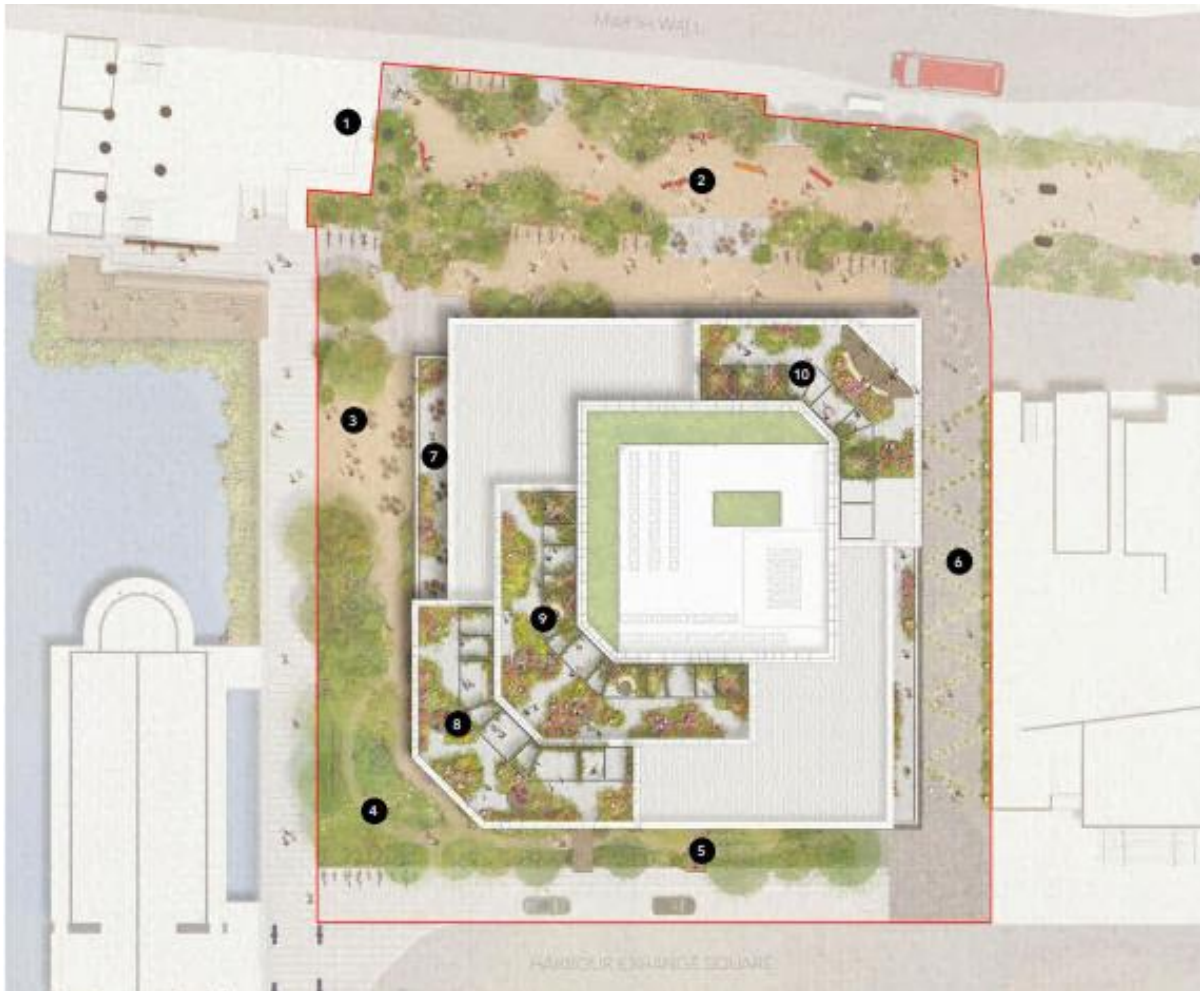


Figure 1- Proposed site layout.

- 2.4 On ground and first floor, the proposed would include a variety of uses. The proposed retail unit is situated on the ground floor of the proposed building in the north-western corner on Marsh Wall. The proposed restaurant would be located on the ground and first floors along the eastern part of the proposed building.
- 2.5 The proposed creative space would be mainly situated on the first floor with a separate access point on Marsh Wall. The proposed community space is also proposed on the first floor with a separate access and additional space on the ground floor level in the south-eastern corner of the building.
- 2.6 The proposed uses on the ground and first floors would be accessible to the public via the publicly accessible stairs along the northern part of the building and south-eastern corner, as well as the publicly accessible lift on Marsh Wall. The proposed outdoor amenity on the first floor would serve the uses on this floor and as such would be accessible to the wider public.
- 2.7 Level 02 would be dedicated to the provision of the proposed child play space in the form of internal and external space for residents.
- 2.8 The proposed residential units would be situated on the upper levels, starting from Level 03. The proposed access to residential units is on the southern edge of the proposed buildings with affordable and market entrances separated one next to the other.
- 2.9 The proposal would provide a total of 450 residential units, with the affordable housing provision of 35%. Due to the split of the cores throughout the building, the southern part of the building would provide affordable units whilst the northern part would provide market units. On Levels 3-24 a mixture of affordable and market homes would be provided whilst from Level 25 above there would be only market homes, as shown on the image below.

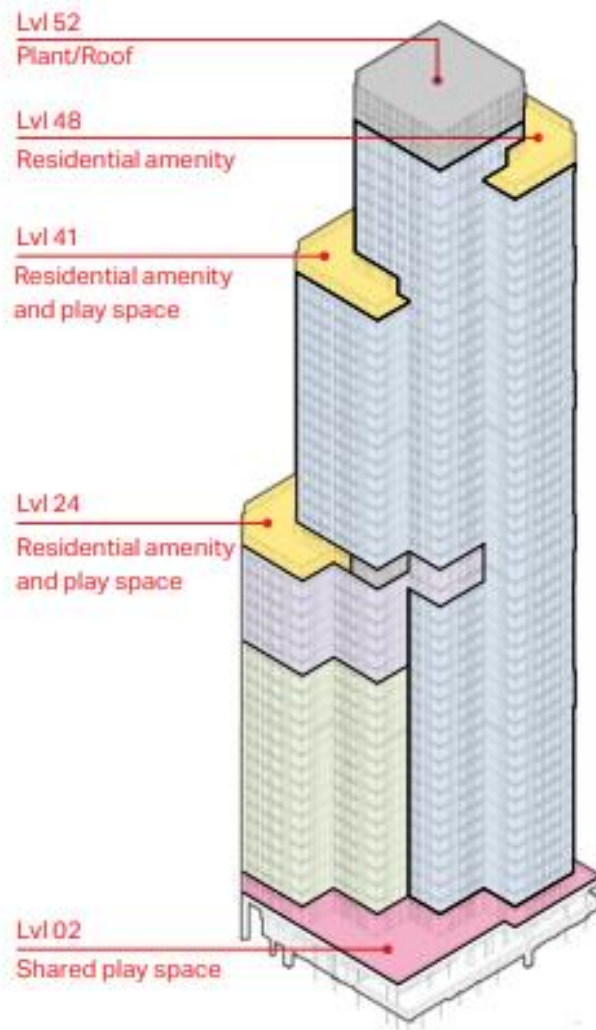


Figure 2- Proposed tenures and amenity spaces.

Key: grey – affordable rented tenure; Purple – intermediate tenure; Blue – market tenure.

- 2.10 The communal amenity spaces are proposed on Levels 24, 41 and 48. The majority of child play space is proposed on Level 02 with additional space provided within publicly accessible landscaped space in the south-eastern corner of the building and within the DLR underline.
- 2.11 The proposed housing mix would provide a 70% affordable rented and 30% intermediate affordable housing units. The proposed affordable rented units would be equally split between London Affordable Rent and Tower Hamlets Living Rent whilst the proposed intermediate units would be shared ownership.
- 2.12 The proposed tall building would sit on top of a three-storey podium structure and would have the stepped massing to the south. The stepping mass tiers would also be reflected in the width of the building, leaving the most northern tier the tallest.



Figure 3. Proposed form and massing.

- 2.13 The architectural treatment of the proposed building would create a modern industrial appearance. The podium structure would have a strict horizontal appearance whilst the building itself would have vertical and horizontal façade elements breaking down the building form and reflecting the old industrial warehouses. The form of the building would additionally be vertically articulated by the winter gardens situated in corners of the stepping tiers.
- 2.14 The proposed landscaping within the site's boundary would have different character areas reflecting the proposal's aim to provide a variety of different activities within the public open space.



Figure 4. Proposed landscaping character areas.

- 2.15 The proposal includes changes to the DLR underline area to provide additional landscaping and child play space. Outside of the red line boundary is the proposed floating timber deck pontoon with seating however this element is subject to agreement with the Canal and River Trust.
- 2.16 The proposed development would provide a total of 14 blue badge spaces on the first basement level, which would be accessed via a car lift proposed in the north-eastern corner of the building. A total of 822 cycle parking spaces are proposed on the same basement level, which would be accessed via a dedicated cycle entrance and cycle lift in the south-eastern part of the proposed building.
- 2.17 With respect to the short-stay and visitor cycle parking, 72 spaces are proposed within the landscaped area closer to the building entrances, some of which are situated closer to the DLR station and the rest adjacent to the open space in the south-western corner of the site.
- 2.18 Servicing, including waste collection, and deliveries would all take place along the Eastern Street which forms part of the site's boundary and would be privately managed.

3. RELEVANT PLANNING HISTORY

- 3.1 The existing curtain wall office buildings on the wider Harbour Exchange Square were erected in the late 1980s, under planning permission FP/97/86333.
- 3.2 Various minor planning applications for changes of use within certain parts of the building, minor external changes, and advertisement consent were granted for 4 and 5 Harbour Exchange Square.

- 3.3 A planning application for EIA Scoping Opinion was issued for the development under reference PA/21/02373.
- 3.4 Planning history has been provided for the adjacent and neighbouring sites.

The Madison (Meridian Gate), Marsh Wall

PA/14/01428 – Full Planning Permission granted on 06/03/2015. Construction completed in 2021.

Demolition of all existing structures and the redevelopment of the site to provide a building of ground floor plus 53 storeys comprising of 423 residential apartments (Use Class C3) and circa 415 sqm office (Use Class B1), 30 basement car parking spaces; the ground floor uses comprises an electricity sub-station, entrances for the office, affordable and private housing, basement access via car lift and cycle lifts, and circa 43 sqm retail/ café (Use Class A1/A3); public open space; and a single storey enclosure providing a secondary basement access.

Innovation Centre, 225 Marsh Wall

PA/21/00900 – Full Planning Permission refused on 18/08/2022. Appeal currently under consideration.

Erection of a ground plus 55-storey residential building (Use Class C3), ground floor flexible commercial space (Use Class E), basement cycle storage, resident amenities, public realm improvements and other associated works.

PA/16/02808 – Full Planning Permission refused on 10/11/2017. Appeal allowed on 10/10/2018. Permission implemented.

Demolition of all existing structures and the redevelopment of the site to provide a building of ground plus 48 storeys (maximum AOD height 163.08m) comprising 332 residential units (Use Class C3); 810 sqm of community floorspace (Use Class D1); 79 sqm of flexible retail/ restaurant/ community (Use Class A1/A3/D1); basement cycle parking; resident amenities; public realm improvements; and other associated works.

Skylines Village, Limeharbour

PA/17/01597 – Resolution to grant Full Planning Permission obtained on 28/03/2019.

Demolition of all existing structures and construction of a new mixed use development consisting of five buildings ranging from ground plus 3 to ground plus 48 storeys in height comprising 579 residential units (Use Class C3); a two-form entry primary school with nursery facilities (Use Class D1); a 10,272 sqm GIA small and medium enterprise (SME) Business Centre (Use Class B1); 2,228 sqm GIA of flexible commercial floorspace (Use Class A1/A2/A3/B1/D1 and D2); single level basement car parking and servicing; and landscaped open space including a new public piazza with future pedestrian connection to Chipka Street, and ground and podium level communal amenity space.

South Quay Plaza 1-3

PA/14/00944 – Full Planning Permission granted on 30/03/2015.

Demolition of all existing buildings and structures on the site (except for the building known as South Quay Plaza 3) and erection of two residential-led mixed use buildings of up to 68 storeys and up to 36 storeys comprising up to 888 residential (Class C3) units in total, retail (Class A1-A4) space and crèche (Class D1) space together with basement, ancillary residential facilities, access, servicing, car parking, cycle storage, plant, open space and landscaping, plus alterations to the retained office building (South Quay Plaza 3) to provide retail (Class A1-A4) space at ground floor level, an altered ramp to basement level and a building of up to 6 storeys to the north of South Quay Plaza 3 to provide retail (Class A1-A4) space and office (Class B1) space.

PA/15/03074 – Minor material amendments granted on 22/03/2019.

Application for variation of condition 4 (Approved drawings) of planning permission PA/14/00944 dated 30/03/2015 with regards to revised residential unit mix with 6x additional residential units (Class C3), amendments to internal layouts, elevations, landscaping and access arrangements, and incidental works.

South Quay Plaza 4

PA/15/03073 – Full Planning Permission granted on 14/03/2017.

Erection of a 56 storey building comprising of 396 residential (Class C3) Units, Retail (Class A1-A4) Space, together with basement, ancillary residential facilities, access servicing, car parking, cycle storage, plant, open space and landscaping and other associated works.

4. PUBLICITY AND ENGAGEMENT

- 4.1 The applicant carried out the pre-application non-statutory consultation, which is detailed in the submitted Statement of Community Involvement (SCI), prepared by Four Communications.
- 4.2 As evidenced in the SCI, the pre-application engagement consisted of sending letters to key stakeholders in the area and carrying out one-to-one briefings, sending direct newsletter to residents and businesses in the area, issues a newspaper advert, hosting a public webinar and having a dedicated telephone number, email and website for the emerging scheme. As summarised in the SCI, the level of interest has been low, with queries and comments mainly focusing on the scheme's height and massing, car parking provision, amenity for future residents and timeline of the development.
- 4.3 During the pre-application stage, the scheme was presented to the Council's Conservation and Design Advisory Panel which ensure that the proposed design has been reviewed by the experts, as well as to the Isle of Dogs and South Poplar Community Development Panel which is made up of local people living and working in the area.
- 4.4 Upon validation, the Council carried out statutory consultation for the subject application which consisted of putting up planning notices along the western boundary of the site where one is closer to the South Quay DLR Station, as well as a site notice on Marsh Wall, a press notice in the local press, and sending 1,426 neighbour letters.
- 4.5 As part of the planning application process, the applicant amended the scheme to address the HSE concerns with regards to the proposed building being served by a single staircase on Levels 41-51 and installed a second staircase. As such, an EIA Regulation 25 consultation was also undertaken which ended on 20.05.23.
- 4.6 A total of 3 representations were received, one objection and two stating their views on the scheme, as well as supporting the principle of redevelopment, but also raising objection to certain elements of the scheme.
- 4.7 The key points of objection are listed below:

- Loss of light to East facing apartments of the Pan Peninsula scheme;

(Officer comment: Daylight and Sunlight matters are addressed in the amenity section of this report)

- Unsustainable density of the scheme which will unsustainably load the local infrastructure from GPs to transport;

(Officer comment: Density of the scheme is assessed in the Housing section of this report).

- Proposal not compliant with requirements set out in the Neighbourhood Plan;

(Officer comment: A policy review is set out in the Policy section of this report).

- Infrastructure requirements of the Limeharbour Site Allocation 4.4 (primary school and open space). Should the planning permission for Skylines (PA.17.1597) not be issued, the site of building 3 would not be able to accommodate a new school due to the constrained nature and size of the plot.

In terms of open space, the proposed development could inhibit the ability of any future redevelopment of 3 Harbour Exchange and the provision of any open space.

(Officer comment: It is not possible to predict what will come forward on neighbouring sites in the future. As such, it is only possible to follow best planning practice and work within the existing sites restraints/opportunities and follow planning policy. Each application is dealt with on its own merits).

- Separation distance between 4 and 5 Harbour Exchange and 3 Harbour Exchange

(Officer comment: The proposed building would respect the 18m separation distance with building 3).

- Building has potential if appropriate mitigation is not put in place to impact on nearby data centre in terms of air quality

(Officer comment: Air quality is assessed in the Environment section of this report. Appropriate conditions shall be attached should planning permission be granted).

- Confirmation that potential noise from 8+9 Harbour Exchange have been considered.

(Officer comment: This is examined in the Noise section of the report)

5. CONSULTATION RESPONSES

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

External consultees

Canal & River Trust

- 5.2 The proposed development would be amongst the tallest alongside Millwall Inner Dock and the height and mass of the proposal could be problematic in terms of views to the dockside cranes, however, the set back of the proposal on the ground floor will reduce this harm. Provision should be made for bat and bird boxes.
- 5.3 There would be potential for surface water discharge into the dock and an informative is recommended for the applicant to contact C&RT. In the submitted Energy Statement, the applicant has not considered the use of (surface) Water Source Heat Pump (WSHP) instead of Air Source Heat Pumps (ASHP). An informative is recommended about this.
- 5.4 A condition is recommended requiring a feasibility study of the use of the docks for waterborne transport during the construction and operation. A contribution should be sought towards improvements of the open space within the docklands area to help mitigate the impact of the additional occupants and visitors to the development.
- 5.5 Additional two informatives are proposed with regards to access to and oversailing of the C&RT land, as well as to refer to the C&RT's Code of Practice for Works affecting the Canal & River Trust.

Docklands Light Railway

- 5.6 No objection subject to conditions for each stage of the development having been submitted to and approved in writing by the local planning authority which:
- a) provide detailed design and Risk Assessment Method Statements (RAMS) for demolition, foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent).
 - b) prior to the commencement of the development, a base-line radio impact survey shall be undertaken and submitted to LU/DLR. This is to assess the impact of the development on the DLR Radio System signal levels. No development shall take place until a scheme of mitigation has been agreed in writing with LU/DLR and implemented. During development, regular radio impact survey reports shall be undertaken to assess the potential impact. Should the development be found to have caused degradation to the radio signal levels, the developer must fund for the changes required known as "infills". A radio survey shall also be undertaken once the development is completed. The developer shall use DLR's Radio Maintainer (as directed by LU/DLR), for undertaking and generating the radio impact survey reports.
 - c) tower Crane base design (including certification), Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure (including any radio communications), jacking up, derigging in addition to plans for elevation, loads, radius, slew restrictions and collapse radius. No cranes should be erected or dismantled until LU/DLR Engineer's approval has been obtained in writing
 - d) accommodate the location of the existing DLR structures 2
 - e) there should be no opening windows or balconies facing the DLR elevation
 - f) demonstrate access to elevations of the building adjacent to the property boundary with DLR can be undertaken without recourse to entering our land
 - g) demonstrate that there will at no time be any potential security risk to our railway, property or structures
 - h) A Ground Movement & Impact Assessment setting out predicted ground and structure movement should be undertaken and submitted to LU/DLR
 - i) A Movement Monitoring Action Plan should be developed and submitted to LU/DLR
 - j) accommodate ground movement arising from the proposed construction
 - k) mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures.

Environment Agency

- 5.7 The application site is located within Flood Zone 3a and is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event. Our most recent breach hazard modelling study shows the site to be outside of the areas impacted by flooding if there was to be a breach in the defences or they were to be overtopped. We therefore consider this development to be at a low risk of tidal and fluvial flooding.

Greater London Authority

- 5.8 The principle of the loss of office space is accepted within this context based on the submitted marketing evidence report. The principle of the redevelopment of the site for a mixed-use residential-led tall building is supported. The proposed retail floorspace is acceptable and the proposed creative industries and community facilities are strongly supported subject to securing public access and a management plan.
- 5.9 The proposal would provide 35% with 70% London Affordable Rent and 30% London Shared Ownership, which would be eligible for a fast track route. The housing mix raises no strategic concerns. Rental levels and an early-stage review should be secured in the s106 agreement. The proposed child play space would be accessible to all residents which is supported.
- 5.10 The site is appropriate for a tall building due to its inclusion in the tall building zone. Additional information should be provided in relation to the indicated height contours, as well as the immediate and mid-range scale views where the full length of the floorplate will be most prevalent. The cumulative and environmental impacts will be considered at Stage 2.

- 5.11 Further information should be provided on the design and management of the open space fronting the water, The Underline and public realm in front of the building's entrances, as well as the first floor terrace. The principles of the Public London Charter LPG should be secured for the management of the public realm on the site. The use of and access to the first floor terrace should be secured through conditions and obligations
- 5.12 There are two single aspect dwellings on each from Level 25-40, further information should be provided on their residential quality. Further information should be provided on cores, accessibility to communal amenity spaces, mitigation measures for potential overlooking between apartments, increase of sunlighting conditions for the northern roof terrace, and privacy between the host and adjacent building to the east.
- 5.13 Compliance with the fire statement must be secured by condition and wheelchair dwellings should be secured by either condition or condition.
- 5.14 In terms of sustainable development, further information is required on the implementation of energy principles, overheating and carbon savings. Further details should be provided on Whole Life-cycle Carbon and Circular Economy to ensure compliance with the relevant policies.
- 5.15 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening which is strongly supported. Green walls are not supported and should be removed, which may have an impact on the UGF score. The impact on SINC should be clarified with any mitigation measures secured. Details of proposed tree retention and removal should be provided.
- 5.16 In terms of flood risk management, emergency planning measures should be put in place, to be detailed in a Flood Warning and Evacuation Plan secured by condition. The surface water drainage strategy generally complies with the planning policies, however, the drainage strategy plan should be updated to show all proposed suds, attenuation features and dimensions, as well as consideration to water harvesting and reuse to reduce water consumption.
- 5.17 In terms of air quality, further information should be provided on the approach taken for construction traffic assessment, and mitigation measures from emergency diesel generator and construction activities, including controls on non-road mobile machinery.
- 5.18 Further details should be provided on public transport impact and the impact on the proposed development from the DLR railway in accordance with the Agent of Change principle. Improvements set out in the Active Travel Zone assessment should be secured, including a contribution towards the DLR Underline and Legible London wayfinding.
- 5.19 The removal of surface car parking and provision of car free development is welcomed. The proposed amount of car parking and provision of active electric charging points is welcomed. A revised Car Parking Management Plan should set out where the remaining 7% of future disabled parking space. The exceedance of policy requirements for cycle parking space is strongly supported, however the proposed long stay cycle parking mix should be revised and be in accordance with the London Cycling Design Standards.
- 5.20 The construction should be coordinated, and sustainable freight delivers by cargo bikes should be explored. Further consideration should be given to promoting active travel. A Travel Plan should be secured, implemented, and monitored in the s106 agreement.

Greater London Archaeological Advisory Service

- 5.21 The application lies in an area of archaeological interest. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two-stage archaeological condition is recommended to provide an acceptable safeguard.

Historic England

- 5.22 No comments to make on the application.

Historic Royal Palaces

5.23 No comments received.

Health and Safety Executive – Planning Gateway One

5.24 The initial response raised concerns to the external wall system, a single staircase serving floors above Level 40, the strategy for the Level 02 play space, and access to outdoor amenity areas on Levels 24, 41 and 48.

5.25 Following the review of the additional information provided by the applicant to respond to the raised queries, HSE is satisfied with the fire safety design, to the extent that it affects land use planning.

Isle of Dogs Neighbourhood Planning Forum

5.26 No comments received.

London Borough of Greenwich

5.27 The receipt of the application has been acknowledged.

London Borough of Southwark

5.28 No comments received.

London Bus Services

5.29 No comments received.

London Underground Ltd.

5.30 No comments received.

London City Airport

5.31 No objection subject to securing the condition for construction methodology and diagrams.

London Fire & Emergency Planning Authority

5.32 The applicant should refer to the HSE substantive response which raise significant questions as to how policy D5 and D12 have been met.

Marine Management Organisation

5.33 No comments received.

Maritime Greenwich World Heritage Co-ordinator

5.34 No comments received.

Metropolitan Police – Crime Prevention

5.35 No objections to the proposed development of this site, subject to a condition to ensure Secured by Design guidance is fully carried out.

National Air Traffic Service

5.36 No safeguarding objection to the proposal.

National Amenities Society

5.37 No comments received.

National Grid

5.38 No comments received.

Natural England

5.39 Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Port of London Authority

5.40 There are no concerns, as a result of this development, in terms on the workings of navigation equipment along the River Thames.

5.41 The submitted Construction Environmental Management Plan states that there is a considerable potential for river transport of construction which is welcomed. The detailed CEMP condition should include reference to potential river and dock use through an appropriate wording.

5.42 Within the submitted Transport Assessment, a reference is given to river bus services which is welcomed. Information on nearby river bus services should be included in the Travel Information Pack to be provided as part of the sale of each home.

Thames Water Authority

5.43 No objections on the ground of surface water and foul water sewerage network infrastructure capacity.

5.44 The proposed development is located within 15 metres of the TWA's underground waste water assets and an informative should be included with regards to this. The applicant should read the relevant guides as well on working near or diverting our pipes.

5.45 As required by Building Regulations, the applicant should incorporate within their proposal protection to the property to prevent sewage flooding by installing a positive pumped device. This could require a Groundwater Risk Management Permit. A Trade Effluent Consent will be also required. The applicant should consider including a grease separator for kitchen in commercial hot food premises.

5.46 Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs to this development proposal. A condition should be imposed to provide confirmation on water network upgrades prior to the occupation of the residential units.

5.47 The proposed development is located within 15m of a strategic water main and a condition requiring a piling method statement should be secured to provide details prior to any piling taking place.

The Gardens Trust

5.48 No comments on these proposals.

The Greenwich Society

5.49 No comments received.

Transport for London

5.50 Included within the GLA Stage 1

Internal consultees

LBTH Biodiversity Officer

- 5.51 Ecology was correctly scoped out of the EIA as there will be no significant adverse impacts. Biodiversity was a significant driver of the landscape proposals which includes a biodiverse roof at the top level, innovative ornamental open mosaic habitat planting on the roof terraced, bug hotels, inclusion of nectar-rich species in all the indicative planting palettes, and several native tree species.
- 5.52 The proposed seating pontoon would have a minor adverse impact by shading some of the dock, the floating vegetated islands will more than compensate for this. *Pontaderia cordata* should be excluded from the indicative planting palette as it is a non-native species.
- 5.53 Full details of biodiversity enhancements should be secured through a condition, with water's edge proposals potentially needed to form part of the s106 agreement given they are outside the application site.

LBTH Building Control

- 5.54 No comments received.

LBTH CIL team

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

LBTH Energy Efficiency and Sustainability Officer

- 5.56 No objection subject to conditions and carbon offset financial payment

LBTH Environmental Health Team

- 5.57 The LBTH air quality officer has no objections to the proposal, subject to conditions to prevent dust nuisance and air pollution during the construction and operation works.
- 5.58 The LBTH contaminated land officer states that the Ground Condition chapter within the Environmental Statement and Geo-Environmental Preliminary Risk Assessment report provide sufficient information. A pre-commencement condition should be secured for further information to be provided.
- 5.59 LBTH noise officer has no adverse comments to the proposed development subject to securing the planning conditions relating to noise insulation verification report for new residential units, restriction on demolition and construction activities, and details on compliance with standards for noise from plant.

LBTH Growth and Economic Development Team

- 5.60 No objection

LBTH Housing Officer

- 5.61 With regards to intermediate homes, the applicant should confirm the product type and affordability criteria. A better balance would be required within the private sector to be more aligned with the policy.
- 5.62 The applicant should confirm the numbers of wheelchair units within the affordable rented element. The family units should be lower within the tower and not situated on the higher floors. The applicant should ensure that this is addressed. Car parking should be made available to the affordable rented units.

- 5.63 A separate kitchen should be incorporated into the layouts of larger family sizes affordable rented units.
- 5.64 Further details should be provided on access to the Level 24 amenity area and Level 02 play space.

LBTH Place Shaping Team

- 5.65 Overall, the proposals represent a high-quality development delivering a building appropriate to its location and context. Place Shaping have no objections to the proposals.
- 5.66 The proposals have been subject to extensive pre-application discussions including numerous design focused workshops between Place Shaping and the applicant's design team. The proposals were presented to Conservation and Design Advisory Panel in October 2021. The panel were very supportive of the proposals, and particularly complimentary about the landscape presentation and were keen to stress the importance of delivering the ambitious for the underline.
- 5.67 The proposed building respects the hierarchy of townscape which would ensure the prominence of the Canary Wharf Tall Building Zeon and protect the Skyline of Strategic Importance. The proposed development represents an appropriate and welcome townscape response, ensuring that variation in heights remains.
- 5.68 There have been concerns about the form of the building as the building is set of 4 interlinking, stepped towers which has the potential to create a building of significant bulk and form. However, the proposed building would be read in most views as a series of slender towers due to the stepped approach and architectural detailing. The orientation and layout of the proposed building means that true form of the building is rarely seen.
- 5.69 The building's references to heritage, the architectural expression of the building creating a strong vertical emphasis and the proposed materiality approach are all considered to be successful, however, further details should be provided on the detailing via conditions.
- 5.70 The site affords a real opportunity to deliver high quality public realm next to the dock edge. There are some concerns with regards to the use of the dock edge area for seating for commercial uses and inactive frontage to the east used for servicing, although other improvement to the movement through a north-south route is welcomed.
- 5.71 The approach to the proposed communal amenity and child play space is welcomed, reflecting the High Density Living SPD. The separate access points for different tenures are not supported. All units would have good aspect, and particularly the provision of affordable housing units within southern and western aspects is welcomed. There are concerns about winter gardens not being usable, however, there are no objections to this element.

LBTH Senior Arboricultural Officer

- 5.72 No comments received

LBTH Suds Officer

- 5.73 No comments received.

LBTH Transportation & Highways

- 5.74 The applicant entered into good pre-application discussions with the highways team. As a result, the main highways matters were agreed prior to the submission of the application, which is welcomed.
- 5.75 The proposed development would be car free which should be secured through a legal agreement. The exception would be the provision of 3% accessible parking which would be accessed via a lift, however, it is unclear how these spaces would be accessed to residential units. Further details for the potential for a remaining 7% would need to be included in a Car Parking Management Plan.

- 5.76 The proposed cycle parking quantity is welcomed and there would be a mix of stands. Details of the breakdown of stands, access to cycle parking and the use of cycle parking by non-residential staff should be provided. Spaces for cargo bikes should be provided for residents and servicing.
- 5.77 All servicing would take place within the redline boundary which is welcomed. The applicant will be required to manage the dedicated servicing bays. A Service Management Plan should be conditioned. It is a shame that the whole estate is not being put forward for development so that public realm and servicing can be masterplanned.
- 5.78 A new north-south route is proposed to the west of the building which would be shared, and adequate separate between pedestrians and moving vehicles should be ensured. There would be a potential increase in the use of the local pedestrian and cycle infrastructure in the area and as such a financial contribution is sought.
- 5.79 In addition to the outlined conditions, a full demolition and construction management plan following the format of the pro-forma available on the Council's website, as well as a section 278 agreement should be secured.

LBTH Waste Officer

- 5.80 Further details were requested during the course of the application which were received and accepted.
- 5.81 The applicant has committed to provide in bin compaction at a ratio of 2:1 for the residential units and a weekly collection service which will be operated by the Council. Any additional collections will be arranged and funded by the applicant. These will be secured through a waste management condition.

6. RELEVANT PLANNING POLICIES AND DOCUMENTS

- 6.1 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.
- 6.2 In this case the Development Plan comprises:
- The London Plan (2021)
 - Tower Hamlets Local Plan 2031 (2020)
 - Isle of Dogs Neighbourhood Plan 2019-2031 (2021)
- 6.3 The key development plan policies relevant to the proposal are:

Land use

- London Plan: GG2, E1, SI16
- Tower Hamlets Local Plan: D.SG5, S.EMP1, D.EMP3, S.TC1, D.TC5, S.CF1, D.CF3

Housing

- London Plan: D2, D3, D6, D7, D12, D14, H1, H4, H5, H6, H10, S4
- Tower Hamlets Local Plan: D.SG5, S.H1, D.H2, D.H3
- Isle of Dogs Neighbourhood Plan: D1

Design and Heritage

- London Plan: D1, D3, D4, D5, D8, D9, D11, HC1, HC2, HC3, HC4, HC5, G4, SI16
- Tower Hamlets Local Plan: S.DH1, D.DH2, S.DH3, D.DH4, S.DH5, D.DH6, D.DH7, D.DH9, S.OWS1, S.OWS2, D.OWS3, D.OWS4

- Isle of Dogs Neighbourhood Plan: D2, 3D1

Neighbour Amenity

- London Plan: D14
- Tower Hamlets Local Plan: D.SG4, D.DH8
- Isle of Dogs Neighbourhood Plan: CC1, CC2

Transport

- London Plan: T1, T2, T3, T4, T5, T6, T6.1, T7, T8
- Tower Hamlets Local Plan: D.SG4, S.TR1, D.TR2, D.TR3, D.TR4

Environment

- London Plan: G1, G5, G6, SI1, SI2, SI3, SI4, SI5, SI7, SI12, SI13
- Tower Hamlets Local Plan: D.SG3, D.SG5, S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.MW1, D.MW3
- Isle of Dogs Neighbourhood Plan: D1, CC3, SD1

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

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (updated 2019)
- GLA Isle of Dogs and South Poplar Opportunity Area Planning Framework (2019)
- GLA Housing SPG (updated 2017)
- GLA Affordable Housing and Viability SPG (2017)
- GLA Sustainable Design and Construction (2014)
- GLA Accessible London (2014)
- GLA Character and Context SPG (2014)
- GLA London View Management Framework SPG (2012)
- GLA Play & Informal Recreation SPG (2012)
- GLA All London Green Grid (2012)
- LBTH Planning Obligations SPD (2021)
- LBTH Reuse, Recycling and Waste SPD (2021)
- LBTH High Density Living SPD (2020)
- Building Research Establishment (BRE) 'Site layout planning for daylight and sunlight: a guide to good practice' (2011).

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Design & Heritage
- iv. Neighbour Amenity
- v. Transport
- vi. Environment

- vii. Infrastructure
- viii. Local Finance Considerations
- ix. Equalities and Human Rights.

Land Use

7.2 The main issues to consider in terms of land use are listed below:

- The loss of employment (office) space and
- The provision of proposed residential, commercial and community uses.

Designations

- 7.3 Policy SD1 of the London Plan seeks to ensure that the identified Opportunity Areas fully realise their growth and regeneration potential. The site is situated within the Isle of Dogs OA which has the capacity to deliver an additional 29,000 homes and 110,000 jobs.
- 7.4 The site forms part of the Limeharbour site allocation which stretches further to the south and east across Limeharbour. The site allocation policy sets out land use requirements which include housing and a range of employment floorspace.

Loss of office space

- 7.5 Policy E1 of the London Plan states that the redevelopment, intensification and change of use of surplus office space to other uses including housing could be supported, subject to existing office space being surplus of large office spaces.
- 7.6 Policy S.EMP1 of the Tower Hamlets Local Plan 2031 sets out the approach to employment provision and defines the borough's designated employment locations.
- 7.7 Policy D.EMP3 of the Tower Hamlets Local Plan 2031 states that there should be no net loss of viable employment space outside of the designated employment locations unless developments can provide evidence of active marketing over a continuous period of at least 24 months, or provide robust demonstration that the site is genuinely unsuitable for continued employment use due to its condition, reasonable options for restoring the site to employment use are unviable, and that the benefits of alternative use would outweigh the benefits of employment use.
- 7.8 The purpose of this policy is to prevent the unnecessary loss of existing employment space which would put pressure on the ability of the borough to meet projected need.
- 7.9 The application site is not located in any of the designated employment locations. Nonetheless, the loss of office space should demonstrate compliance with the criteria set out in Local Plan policy D.EMP3. The applicant has submitted the Office Report which provides analysis of office occupancy tenancies for 4-5 Harbour Exchange Square, as well as reviewing the supply, demand and vacancy of the wider Docklands market mainly focus to the north and south of the Canary Wharf estate.
- 7.10 Building 4 and 5 are the smallest in terms of floorspace within the Harbour Exchange Estate, where No.4 consists of 5,235sqm and No.5 consists of 3,565sqm. On each of the floors within the buildings, the office units range from 267sqm to 974sqm. The report shows that there have been various vacancies within 4 Harbour Exchange Square for longer than 2 years, whilst half of the No.5 building has been under a management tenancy which is likely to terminate soon due to the loss that the management company has been experiencing.
- 7.11 The applicant has confirmed that the building is approximately 15% occupied with all tenants on short term tenancies. They have taken steps to improve occupancy and continue to market the floorspace, however with limited results.

- 7.12 The submitted information further provides details on additional supply in the future which would result from new developments, as well as the rising vacancy rates from existing developments.

Proposed residential use

- 7.13 Increasing housing supply is a fundamental policy objective at national, regional and local levels. The NPPF encourages the effective use of land through the reuse of suitably located previously developed land and buildings.
- 7.14 Policy H1 of the London Plan sets a ten-year target for net housing completions that each local planning authority should plan for. As such, for the borough is required to deliver 34,730 (3,473 per year) new homes between 2019/2020 and 2028/2029.
- 7.15 At the local level, policy S.H1 of the Tower Hamlets Local Plan 2031 commits to securing delivery of at least 58,965 new homes across the borough (equating at least 3,931 new homes per year) between 2016 and 2031.
- 7.16 The site's inclusion within the Limeharbour Site Allocation and the Millwall Inner Dock Tall Building Zone earmark the site for significant housing delivery which would contribute to the borough's housing stock. As such, the principle of the residential is supported.

Proposed commercial and retail uses

- 7.17 Policy SD7 of the London Plan states that development proposals should ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment.
- 7.18 Policy S.TC1 of the Tower Hamlets Local Plan 2031 defines a network of town centres and describes their role and function in the borough. The policy defines Tower Hamlets Activity Areas as areas that provide a transition between the scale, activity and character of the Canary Wharf Major Centre and their surrounding areas. The Activity Areas should support a mix of uses which make a positive contribution to health and well-being and promote active uses at ground floor level.
- 7.19 Part 2 of policy S.TC1 states that new development within the Tower Hamlets Activity Area will be expected to support the delivery of new retail and leisure floorspace to meet identified needs.
- 7.20 Policy D.TC5 of the Tower Hamlets Local Plan 2031 supports the provision of restaurants within Tower Hamlets Activity Area where it can be demonstrated that the overall vitality and viability of the town centre would be enhanced.
- 7.21 The proposed non-residential uses within the proposed development include retail and restaurant spaces which fall within the Use Class E and creative and community falling mainly within Use Class F. It is considered that the provision in general and proposed floorspace of these units is appropriate to the catchment area of the size, role and function of the Tower Hamlets Activity Area.
- 7.22 Furthermore, the proposed uses would diversify the area and support the Canary Wharf Major Centre, from which the proposed development would be easily and quickly accessible either by foot or on the DLR.

Proposed community use

- 7.23 Policy S1 of the London Plan supports development proposals that provide a high quality, inclusive social infrastructure that addresses a local or strategic need and support service delivery strategies. Part D of the policy encourages the co-location and rationalisation and sharing of community facilities while part E of the policy states that new facilities should be easily accessible by public transport, cycling and walking.

- 7.24 The Isle of Dogs OAPF identifies the need for various social infrastructure facilities to support the growth within the area.
- 7.25 Policy S.CF1 of the Tower Hamlets Local Plan states that development should maximise opportunities for the provision of high-quality community facilities to serve a wide range of users. Part 4 of the policy seeks to direct new community facilities to town centres, in accordance with policy S.TC1.
- 7.26 Policy D.TC3 of the Tower Hamlets Local Plan 2031 states that community facilities within larger developments should be easily accessible to people who live and work outside of the host development.
- 7.27 The proposed development includes a community use (Use Class E) on the first floor with its separate entrance on the ground floor. The proposed use is proposed as a flexible health and wellbeing space, with uses such as a community health centre, spaces for exercise, yoga studio, etc.
- 7.28 Whilst it is acknowledged that at present there is no end user for this space, it is considered that further details should be detailed at a further date. The delivery of the community space will be secured through a planning obligation with s106 agreement, along with additional details on the final use and management of the space.

Conclusion

- 7.29 Overall, the submitted scheme would provide a number of public benefits. The loss of the existing office floorspace has been justified and the scheme would deliver a significant amount of residential units whilst reactivating the site. The provision of retail and community units on the site would also be an acceptable use. The provision of active ground floor retail and restaurant floorspace is also supported in addition to the public realm enhancements and will all assist in the revitalisation of the area.

Housing

- 7.30 Development Plan policies set out a number of requirements which guide residential development in the borough.

Housing Supply

- 7.31 London Plan Policy H1 sets Tower Hamlets a housing completion target of 34,730 units between 2019/20 and 2028/29. The proposed development would result in an additional 421 homes, which would make an important contribution towards meeting this target and is strongly supported.
- 7.32 Policy S.H1 refers to the need for the Borough to secure the delivery of 58,965 new homes between 2016 and 2031, which equates to 3,931 new homes each year. Provision is to be focussed in Opportunity Areas. The Isle of Dogs and South Poplar Sub-area is expected to deliver at least 31,209 new homes.
- 7.33 Therefore, taking into consideration the local and strategic policy designations as well as the NPPF, the provision of housing in this location carries substantial weight in favour of the proposal.

Housing Mix and Tenure

- 7.34 The table below sets out the scheme's housing mix against the policy requirements set out in policy D.H2.

Unit Size	Total Units	Affordable Housing						Market Housing		
		Social Rent			Intermediate			Units	As a % (by units)	Policy Target %
		Units	As a % (by units)	Policy Target %	Units	As a % (by units)	Policy Target %			
1 Bed	276	21	25.3%	25%	6	16.2%	15%	249	75.5%	30%
2 Bed	108	25	30.1%	30%	16	43.2%	40%	67	20.3%	50%
3 Bed	51	25	30.1%	30%	12	40.5%	45%	14	4.2%	20%
4 Bed	15	12	14.5%	15%	3			0	0	
Total units	450	83	100%	-	37	100%	-	330	100%	-
Total HR	1142	277	-	-	123	-	-	742	-	-
		120units/400hr (35% HR)						330units/742hr (65% HR)		

Table 1. Proposed housing mix assessed against the requirements of policy D.H2.

- 7.35 Within the affordable rented tenure, the units are very close to matching policy requirements. There would be a policy compliant proportion of 1, 2 and 3 bed units with the 4 beds being slightly under. However, overall, there would be a good range of unit sizes within this tenure.
- 7.36 Within the Intermediate tenure, again, the focus has been on delivering smaller 1 and 2 bed units rather than larger family sized units which can be less affordable for prospective owners.
- 7.37 Within the Market homes there is an over provision of 1bed homes with an under provision of 2, 3 and 4 bed units. However, given that Tower Hamlets faces an acute housing need – in particular affordable family housing and that Tower Hamlets faces considerable challenges in delivering homes which are affordable to local people on average-to-medium incomes, who are unable to access social housing or afford market housing, a degree of flexibility can be applied to the market housing mix.
- 7.38 Part 3 of policy D.H2 requires proposals to provide a range of unit sizes. Where a development proposes to deliver at least 35% affordable housing (to use the fast track approach) and in exceptional circumstances (e.g. where applications propose to deliver a significantly higher quantum of affordable housing than 35%, whilst meeting the required affordable housing tenure mix, and/or propose to deliver significant social infrastructure on-site), officers will accept a market unit mix which departs from policy.
- 7.39 In this instance, the proposal meets the tenure split requirements of Part 1 of policy D.H2 which is 70% rented and 30% intermediate. In addition, the proposals meet the requirements of supporting paragraph 9.30 of the Local Plan which stipulates that affordable housing should be comprised of:
- 70% rented element, of which 50% should be London affordable rents and 50% should be Tower Hamlets living rent, and
 - 30% intermediate element, which includes London living rent shared ownership and other intermediate products..
- 7.40 In addition to the above, the scheme would still provide a proportion of family housing in the market tenure (albeit not significant) and the proposal would largely meet the unit mix requirements to deliver family housing in the affordable tenures.
- 7.41 To summarise whilst there are some conflicts with the policy targets across the tenures, particularly the market units, overall the development would deliver a significant proportion of family sized units across the scheme, especially within the affordable rented tenure where

demand and housing need is highest. Furthermore, the development would deliver a mixed and balanced development with a range of tenures and unit sizes.

Affordable Housing

- 7.42 Policy H4 of the London Plan sets a strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. To secure greater security of affordable housing delivery, Policy H4 requires major developments which trigger affordable housing requirements to provide affordable housing through the 'threshold approach' to applications.
- 7.43 Policy H5 of the London Plan sets out the threshold approach on residential developments to be a minimum of 35 per cent. In order to follow the Fast Track Route which does not require the submission of viability assessment, applications must meet or exceed the 35% affordable housing, be consistent with the relevant tenure split, meet other relevant policy requirements and obligations.
- 7.44 In addition, part C of policy H5 of the London Plan states that in order to follow the Fast Track Route, applications must meet or exceed the relevant threshold of affordable on site without public subsidy, be consistent with the relevant tenure split, meet other relevant policy requirements to the satisfaction of the borough and demonstrate they have taken account of the strategic 50 per cent target and have sought to increase the level of affordable housing.
- 7.45 Policy H6 of the London Plan under Part A establishes the split of affordable products that should be expected from proposals for residential development. It can be summarised from Part A (1-3) as a minimum of 30 per cent low-cost rented homes, a minimum of 30 per cent Intermediate products and the remaining 40 per cent to be determined by the Borough as low-cost rented homes or Intermediate product based on identified needs. The policy also reiterates that Part A must be met to qualify for the 'Fast Track' route.
- 7.46 At the local level, policy S.H1 of the Tower Hamlets Local Plan 2031 requires development to contribute towards the creation of mixed and balanced communities by requiring a mix of rented and intermediate affordable tenures. Policy D.H2 provides further guidance on requiring developments to maximise the provision of affordable housing in accordance with a 70% rented and 30% intermediate tenure split.
- 7.47 Of the total proposed 450 units, the scheme would provide 120 affordable homes, amounting to 35% by habitable room. The proposed tenure split is 83 Affordable Rent homes and 37 Intermediate homes, which equates to 70:30 Social Rent: Intermediate by habitable room. This meets the Council's policy requirement of 70:30 and is welcome.
- 7.48 Given that the affordable housing provision is meeting the 35% affordable housing policy requirement, it is not necessary to undertake a viability review as the proposal meets the requirements for the fast track route. The fast track route enables developments to progress without the need to submit detailed viability information and without late viability review mechanisms which re-assess viability at an advanced stage of the development process.
- 7.49 Overall, the proposed affordable housing mix and offer is supported by officers.

Integration of different tenure types

- 7.50 Both the affordable and private homes would be delivered within the single tower building. There will be a separate entrance for the affordable units and the private units along the southern elevation. Whilst officers would prefer to see a shared entrance for the affordable and private units to create social cohesion and social integration within buildings, it is acknowledged that this is not always possible. During the course of the pre-application discussions and post submission of the application, the applicant was asked to revisit this. However, the applicant has confirmed that the scheme was designed following discussions with Registered Providers (RPs) who were adamant that the increased service charge associated with a shared entrance would be unaffordable for the RPs and tenants and that the current design was more appropriate.

- 7.51 Officers acknowledge this financial predicament and understand the implications this could have on the deliverability of affordable housing. As such, given that the entrances are located next to each other; have the same prominence; quality of design; outlook and are similarly sized, officers on balance accept this as it results in a scheme which can ultimately be delivered.
- 7.52 Inside the building there would be two cores allowing the management of these spaces to be separated more easily and ensure that any service charges are also controlled appropriately for the different tenures.
- 7.53 The residential section of the building starts at level 03. The south-west section of the building from levels 03-24 contains the affordable units which benefit from unobstructed view and significant daylight. These affordable homes are broken-down into two sections, with levels 03-17 housing the socially rented flats, and levels 18-24 housing the intermediate homes. The remaining section of the building is allocated for the market tenure. In addition to the private amenity space provided by the wintergardens in each of the apartments, the building has three levels of shared residential amenity. The three levels of residential amenity are split between indoor and outdoor amenity usage. The level 02 podium amenity is allocated for child play catering for ages 0-17 years. This can be access by all residents within the building regardless of the tenure.
- 7.54 There would be no discernible difference in the quality of the external appearance of the homes in the different tenures. The ground floor amenity space and underline would be open and accessible to all residents as well as the public. Officers consider these arrangements to be acceptable.

Quality of Residential Accommodation

- 7.55 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This policy also requires the maximisation of dual aspect dwellings, the provision of sufficient daylight and sunlight to new dwellings and a minimum floor-to-ceiling height to be 2.5m for at least 75% of gross internal area (GIA) of each dwelling.
- 7.56 The above targets are reflected at the local level by Policy D.H3 of the Local Plan which seeks to ensure that all new residential units meet the minimum standards prescribed within the London Plan and Housing SPG. Policy D.H3 also requires that affordable housing should not be externally distinguishable in quality from private housing.
- 7.57 Private amenity space requirements are determined by the predicted number of occupants of a dwelling. Local Plan Policy D.H3 sets out that a minimum of 5sqm is required for 1-2 person dwellings with an extra 1sqm provided for each additional occupant.
- 7.58 In addition, London Plan Housing SPG reiterates the above standards and states that a maximum of eight dwellings per each core on each floor.
- 7.59 The proposed residential building has been designed with a very high level of dual aspect homes, where 96% of proposed units would be dual aspect. There would be no single-aspect north-facing units. This has been achieved due to the specifics of the proposed building layout, as discussed further in the design section of this report.
- 7.60 All of the proposed units would meet the minimum internal space standards. Similarly, the proposed winter gardens would be provided as private amenity space for all proposed units, meeting all of the minimum standards for larger units and exceeding them for smaller units. The applicant's rationale for the provision of winter gardens for all units to ensure their use throughout the year, as well as to allow the flexible use of it.
- 7.61 Whilst the proposed design allows for more than 8 units per floor, there would be no more than 8 units per each of the cores. Up to Level 24, there would be 6 units using the southern core and 5 units using the northern core. Above Level 24, all of the units would be private, but utilising both core so that there would be no more than 8 units per any of the two cores.

Wheelchair units

- 7.62 Policy D7 of the London Plan requires residential developments to provide at least 10% per cent of dwellings which meet M4(3) (wheelchair user dwellings) and all other dwellings (90%) which meet requirement M4(2) (accessible and adaptable dwellings) of the Building Regulations Approved Document M: Access to and use of buildings.
- 7.63 Policy D.H3 of the Local Plan requires the same provision as London Plan policy however, supporting paragraph 9.44 clarifies that all 'wheelchair user dwellings' in the Affordable Rented tenure should meet M4(3)(2)(b), i.e., built to fully accessible standards and capable for immediate occupation rather than adaptable for wheelchair users.
- 7.64 The proposal would feature wide and clearly legible areas of public realm, which would be accessible by disabled people. The proposal would provide in excess of 10% of homes as wheelchair accessible, which is supported. The Council should secure M4(2) and M4(3) requirements by condition or obligation.
- 7.65 All homes have been designed to comply with the Building Regulations Part M4(2) ('accessible and adaptable) and 60 (13%) would comply with Building Regulations Part M4(3)(a) and (b) (easily adaptable or fitted out). These homes would comprise the following:
- Market – 36 units (10.9%) (18x1bed and 18x2bed)
 - Affordable Rent – 18 units (21.7%) (13x1 bed and 5x4 bed); and
 - Shared Ownership – 6 units (16.2%) (3x1 bed and 3x4bed)
- 7.66 A large proportion of wheelchair units would be delivered within the affordable tenure which is welcome. Officers recommend that the delivery of wheelchair accessible homes is secured by condition and that this reserves details of proposed 18 x Social Rent wheelchair accessible homes (which are to be 'fitted out' and comply with Building Regulation M4 (3)(2)(b) standard).

Privacy, Outlook & Sense of Enclosure

- 7.67 Policy D.DH8 of the Tower Hamlets Local Plan 2031 requires new development to maintain good levels of privacy and avoid an unreasonable level of overlooking or unacceptable increase in the sense of enclosure. The supporting text of the policy suggests that a distance of approximately of 18m is likely to reduce inter-visibility to a degree acceptable to most people. In addition, the policy seeks to ensure new and existing habitable rooms have an acceptable outlook.
- 7.68 Given its position, the application site mainly benefits from limited constraints in terms of privacy, outlook and sense of enclosure due to the dock to the west, and the DLR tracks and Marsh Wall to the north stretching over 20m to the opposite side of the road where the closest building is situated. As such, the distance to other properties would limit the impact on the amenity of future occupiers.
- 7.69 The proposed building is the first one to come along for redevelopment within the wider Harbour Exchange Estate. The existing buildings to the east and south have an established office and the future proofing of their redevelopment is further discussed in the neighbouring amenity section of the report.
- 7.70 The existing office building to the south-east of the application site, 1 and 2 Harbour Exchange, is situated circa 27m from the southern elevation of the proposed building. Given the separation distance from the application site and habitable rooms, it is not considered that there would be a significant impact on future occupiers.
- 7.71 Immediately to the east of the application site sits 3 Harbour Exchange, which is 11 storeys in height and has a rounded shape wrapping around a central core with the northern and eastern elevations being fully curved along the junction of Limeharbour and Marsh Wall. Another core with a staircase and a lift is provided on each of the western and southern elevations. The western elevation of the building would be closest to the proposed building,

placed 18m from its eastern elevation. If the site on which building 3 is redeveloped in the future, this could be increased to 20m or more.

- 7.72 Given that the majority of usable office fenestration within 3 Harbour Exchange would be situated further away from the proposed building, it is not considered that there would be issues in terms of privacy and outlook. It is considered that there would be some minor impact on the lower-level residential units in terms of sense of enclosure, however, the level of the impact is not considered to be unacceptable.

Daylight, Sunlight & Overshadowing

- 7.73 Policy D.DH8 of the Tower Hamlets Local Plan 2031 requires the protection of the amenity of future residents and occupants by ensuring adequate levels of daylight and sunlight for new residential developments following the methodology set out in the most recent version of the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight'.
- 7.74 The new BRE's guidance was published in June 2022, superseding the older version of the guidance from 2011. Given that the application was registered as valid well before the new guidance came into place and as such the submitted information is assessed against the old guidance, this is considered acceptable. As such, the assessment in this report also refers to the BRE's 2011 guidance.
- 7.75 In the guidance, the primary method of assessment of new build accommodation is through calculating the average daylight factor (ADF). BRE guidance specifies the target levels of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. For shared living spaces which include living/kitchen/dining areas, ideally 2% should be achieved given that is the minimum ADF for kitchen areas.
- 7.76 The No Sky Line assessment is a test that establishes where within the proposed room at working place height the sky will be visible through the windows, taking into account obstructions.
- 7.77 Further guidance is provided with regard to sunlight, with the BRE guidance stating that in general, a dwelling which has a particular requirement for sunlight will appear reasonably sunlit if at least one main window faces within 90 degrees due south and the centre of one window to a main living room can receive 25% annual probably sunlight hours (APSH), including at least 5% annual probably sunlight hours in the winter months (WPSH) between 21 Sept and 21 March.
- 7.78 An Internal Daylight, Sunlight and Overshadowing Report produced by GIA, which provides an assessment of the quality of accommodation and amenity of the proposed development, has been submitted in support of the application. The Council's external consultants, Delva Patman Redler (DPR), have reviewed the submitted information.

Daylight

- 7.79 The assessment analysed daylight provision in the proposed development by calculating the Average Daylight Factor (ADF) and No Sky Line (NSL) inside each of the proposed rooms.
- 7.80 A total of 1144 habitable rooms were tested for the daylight assessment. 1106 of the windows would meet the minimum ADF recommendations whilst 1114 of these would achieve the sky visibility measured through NSL. This amounts to a 97% daylight compliance with the BRE guidance.
- 7.81 With regards to the ADF calculations, 38 would fall short of the minimum ADF levels. Of these, 7 rooms would be a large living/kitchen/dining space which would meet the minimum 1.5% for living areas, but not the 2% standard for kitchens. Another 10 rooms would be living areas with ADF levels ranging between 1.2%-1.4%.
- 7.82 Of the remaining rooms not meeting the minimum ADF levels, 20 would be on the lower levels facing south-east. 15 of these rooms would have ADF levels between 0.7-1.4% and

would be dual aspect with winter gardens. The final room not meeting the ADF level would be a bedroom with ADF of 0.9% which is slightly under the 1% recommendation for bedrooms.

- 7.83 Overall, the proposed development would ensure a very good level of adherence to daylight guidelines, as confirmed by the Council's consultants.

Sunlight

- 7.84 The assessment analysed sunlight provision to living areas in the proposed development. This includes the assessment of annual probable sunlight hours (APSH) and winter probable sunlight hours (WPSH).
- 7.85 A total of 243 living areas with a window facing 90 degrees due south was analysed, where 231 rooms would meet both APSH and WPSH achieving compliance levels of 95%, and 237 the rooms would meet the APSH recommendations.
- 7.86 The 6 rooms that would not meet the minimum sunlight recommendations for either APSH and WPSH would have the figures between 14%-22%. Whilst these rooms would all be dual aspect, their location within the proposed building would result to the lower levels of sunlight when compared against the recommendations in the BRE guidance.
- 7.87 Overall, it is considered that the proposed residential development would perform very well with regards to the sunlighting hours that future occupiers would receive.

Overshadowing

- 7.88 A total of 7 amenity areas within the proposed developments have been analysed. These include the ground floor areas wrapping around the proposed building, including the DLR underline space; dockside seating area; outdoor child play space on Level 02, and communal amenity spaces on Levels 24, 41 and 48.
- 7.89 The Eastern Street public realm and the northern part of the site consisting of the DLR would fail to have at least two hours of direct sunlight across at least half of the area. The other space not meeting the minimum recommendations would be the northern child play space on Level 02.
- 7.90 Both of the spaces experiencing lower than recommended sunlight on ground hours would be due to their position within the proposed development being to the north of the massing of the proposed building. Nonetheless, it is considered that the proposed development would provide an adequate level of amenity with regard to the sunlighting levels of the proposed amenity spaces.

Conclusion on Daylight, Sunlight and Overshadowing

- 7.91 As a result of the above assessment, it is considered that the proposed development would receive a very good amount of daylight and sunlight given the high level of analysed rooms meeting the minimum BRE guidelines. The proposed amenity spaces would also receive appropriate levels of sunlight on ground.

Fire safety

- 7.92 London Plan (2021) policy D12 requires all major applications to be submitted with a Fire Statement produced by a third party, suitably qualified assessor, demonstrating how the development proposals would achieve the highest standards of fire safety. The policy sets out the requirements in terms of details that Fire Statement should contain.
- 7.93 The application is supported by a Fire Safety Statement by Hoare Lea, and a fire statement form completed on 03/05/2022 as per the requirements of the Planning Gateway One process under the Health and Safety Executive (HSE).
- 7.94 In the initial response, the HSE raised concerns with regards to the proposed building being served by a single staircase on Levels 41-51, the use of staircases for different uses and

areas including the basement and ancillary uses, the use of external wall systems with an insufficient fire performance.

- 7.95 The applicant has made further changes to address these comments including extending the staircase on Levels above 41 to Level 49 where only access is provided to duplex flats. Other additional clarifications have responded to the HSE's raised concerns, following which this was formally confirmed by the HSE who are content with the submitted information.

Communal Amenity Space & Play Space

Communal amenity space

- 7.96 Policy D.H3 (Part C) of the Local Plan requires that for major developments (10 residential units or more) communal amenity space should be provided. The provision should be calculated based on 50sqm for the first 10 units with an additional 1sqm for every additional unit thereafter.
- 7.97 The proposed development would deliver a total of 907 sqm of communal amenity space against the minimum requirement of 490 sqm. Overall, 73% of the proposed communal amenity space would be external provided through terraces and 27% would be internal.
- 7.98 Of the total space, 322 sqm of the space would be provided on Level 24 and it would be accessible to the affordable tenure units whilst the remainder of the communal amenity space, consisting of 366 sqm on Level 41 and on 219 sqm Level 48, would cater for private tenure units.
- 7.99 When considered separately in terms of minimum requirements, the proposed development would still overprovide the communal amenity space for the affordable and private units. In terms of tenure accessibility, it has been noted that the affordable lifts run up to Level 24 where the affordable communal amenity space is proposed.
- 7.100 Due to the changes of the layout on the upper floors, the affordable units have not been provided with access to the Level 41 and 48 spaces. Whilst this does not seek to promote positive social cohesion, the challenges associated with the management of these spaces due to the difference in tenures have been acknowledged.
- 7.101 In summary, the amount of proposed communal amenity space exceeds the policy requirements and would be of a high-quality design. This is supported by officers.

Child play space

- 7.102 Policy S4 of the London Plan seeks to ensure that development proposals that include housing make provision for good quality accessible play and informal recreation and enable children and young people to be independently mobile.
- 7.103 The GLA's Play and Recreation Supplementary Planning Guidance (2012) provides detailed guidance on the appropriate distances to local play spaces as well as guidance on the needs of the different age groups in terms of equipment and scale. The SPD also provides details on the needs of different age groups.
- 7.104 At a local level, Policy D.H3 requires major development to provide a minimum of 10sqm of high-quality play space for each child. The child yield should be determined by the Tower Hamlets Child Yield Calculator.
- 7.105 The following table provides details on child yield generated by the proposed development and the minimum child play space requirements based on the LBTH Child Yield and Play Space calculator.

Age	Child yield	Required space [sqm]	play	Provided space [sqm]	play
0-4	64	638		644	
5-11	52	522		525	
12-18	51	506		512	
Total	167	1,665		1,681	

Table 2. Child yield, child play space requirements and provision for the proposed development.

7.106 The proposed development would provide a total of 1,681 sqm of child play space. The majority of this space would be provided on Level 02 in the form of internal spaces and terraces, whilst a small space amounting to 203 sqm would be provided on the ground level within the landscaped area along the south-western corner of the site.

7.107 Given its location, the proposed child play space within the landscaped area would be publicly accessible which is welcomed. The remainder of the proposed child play space on Level 02 would be tenure blind meaning that all future residents of the proposed development, regardless of their tenure, would be able to access the space.

7.108 The indicative play space arrangement has been provided to indicate how different spaces on Level 02 will be used in order to ensure that there are spaces and equipment for each of age groups, as required by the policy. Whilst limited information has been submitted to detail the proposed child play space, further information would be secured via condition.

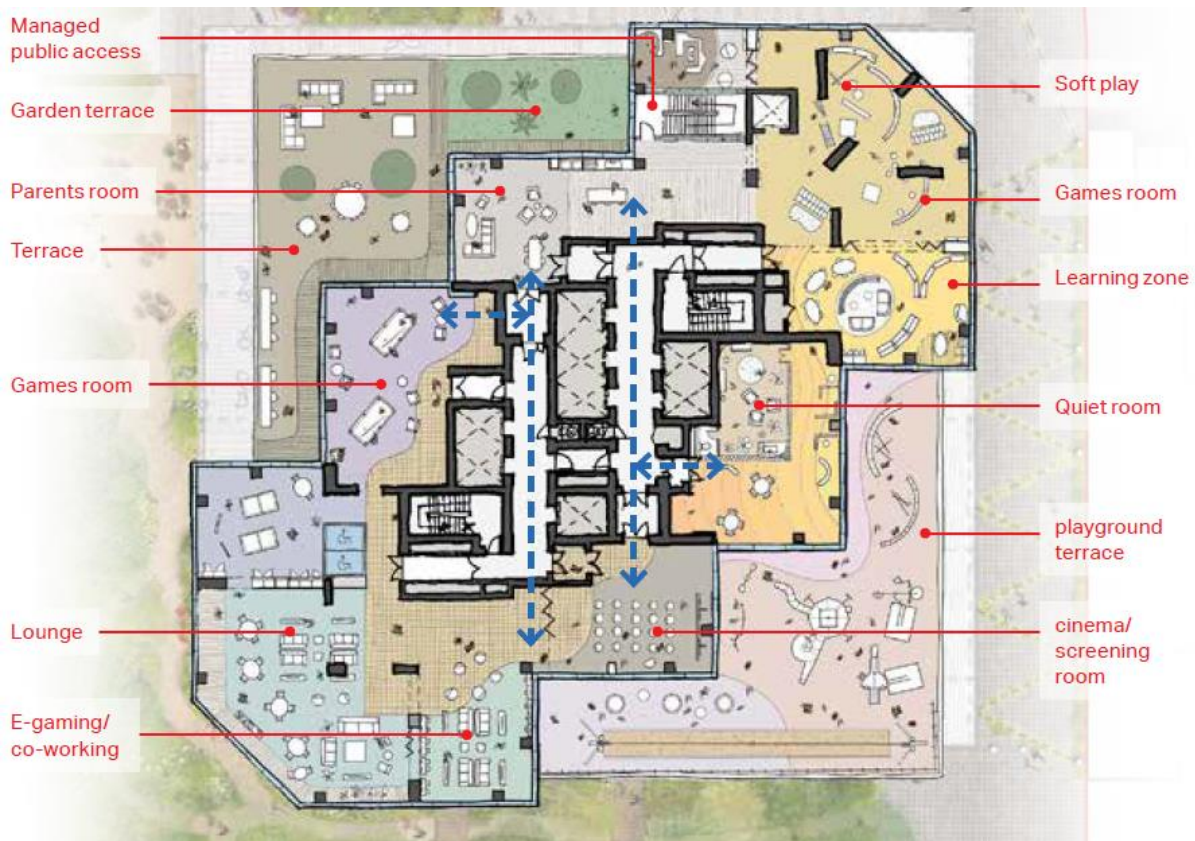


Figure 5. Proposed child play space on Level 02.

7.109 In addition to providing a policy compliant level of child play space, the applicant has also proposed additional incidental play to be provided within the DLR underline and the landscaping area along the southern edge of the proposed building.

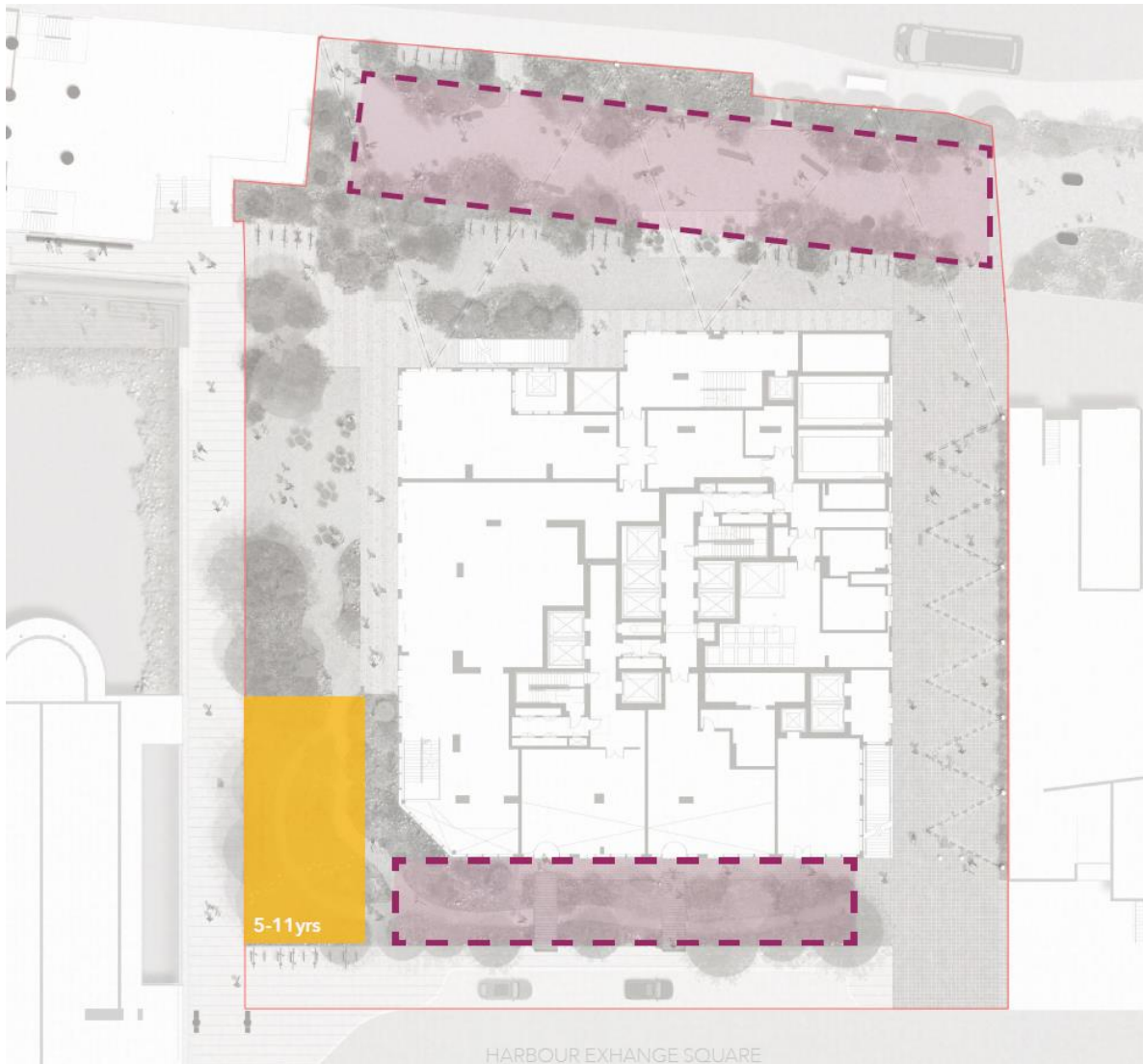


Figure 6. Proposed ground floor child play space with policy required space highlighted in yellow and additional incidental space shaded in purple.

7.110 Overall, the proposed child play space provision is considered acceptable and would contribute to the delivery of high-quality residential accommodation, as well as a wider social cohesion to the area.

Density

7.111 The London Plan no longer incorporates a density matrix unlike its predecessor. Policy D3 of the London Plan requires that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.

7.112 The proposed development would have a density of 1030 dwellings/ha (2616 hr/ha). London Policy D4 requires that all proposals exceeding 30m high and 350 units per hectare must have undergone a local borough process of design scrutiny. The applicant has engaged extensively with officers through pre-application discussions and the scheme was considered by the Conservation and Design Advisory Panel (CADAP), which has informed the current scheme and design layout. The application scheme generally reflects guidance in the *High-Density Living SPD*, which was in draft at the time that the application was submitted. The London Plan (para. 3.4.9) requires applications for higher density developments (over 350u/ha) to provide details of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers). A condition is recommended with regards density management plan.

- 7.113 Policy D.DH7 of the Local Plan requires that where residential development exceeds the density set out in the London Plan, it must demonstrate that the cumulative impacts have been considered (including its potential to compromise the ability of neighbouring sites to optimise densities) and any negative impacts can be mitigated as far as possible.
- 7.114 Isle of Dogs Neighbourhood Plan Policy D2 expects developments exceeding the 1,100 habitable rooms/hectare density to meet the specific expectations set out in the Mayor of London's Housing SPG for development exceeding the density matrix thresholds in the previous (2016) London Plan. It is noted that the updated London plan 2021 no longer makes reference to the density matrix however the proposal has been considered in relation to the Housing SPG.
- 7.115 The development is considered to contribute positively in terms of placemaking, creating a high quality public realm and amenity space that improve the pedestrian experience. The development would provide a good mix of housing with good quality child playspace accessible to all residents. Servicing and cycle storage has been considered extensively through pre-app and the application. Furthermore given the location of the site, in the Millwall Tall Building Cluster, an Opportunity area as well as a site allocation which requires housing to be delivered a high density housing scheme is considered appropriate.

Design & Heritage

- 7.116 The importance of good design is emphasised in Chapter 12 of the NPPF and the National Design Guide and development Plan policies which require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets. Therefore, within the borough, it is expected that development must do more than simply preserve, the requirement is to enhance and improve.
- 7.117 London Plan (2021) policy D3 promotes the design-led to optimise site capacity. The policy requires high density development to be located in sustainable location, in accordance with London Plan (2021) D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.
- 7.118 Furthermore, policy D3 requires developments to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, as well as to respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.
- 7.119 London Plan policy D4 requires development proposals referable to the Mayor to have undergone at least one design review early on in their preparation before a planning application is made. As mentioned previously, the proposals had been reviewed and commented on by the Council's expert design panel.
- 7.120 Tower Hamlets Local Plan policy S.DH1 outlines the key elements of high quality design so that the proposed development are sustainable, accessible, attractive, durable and well-integrated into their surroundings. Complementary to this strategic policy, Local Plan policy D.DH2 seeks to deliver an attractive, accessible and well-designed network of streets and spaces across the borough.
- 7.121 Neighbourhood Plan policy 3D1 requires all strategic developments to be accompanied by a 3D model that is compatible with the model used for assessment as part of the development management process. The applicant has submitted a Vu City model which indicates compliance with the Neighbourhood Pan policy.

Site Layout and Access

- 7.122 The existing office building takes up the majority of the application site, stretching the whole width of the site and leaving some limited breathing space along the south and north edges of the existing site layout.

7.123 Tower Hamlets Local Plan policy S.DH1 requires development to represent good urban design including coherency in building lines, roof lines and setback, complementing streetscape rhythms and associated landscapes.

7.124 The Limeharbour Site Allocation which requires developments to integrate buildings with improved public realm and stepped back layout from the dockside to allow the creation of fully accessible active frontages providing a series of interconnected spaces in accordance with the green grid, as well as to improve biodiversity and ecology along the water edges.



Figure 7. Indicative Limeharbour Site Allocation.

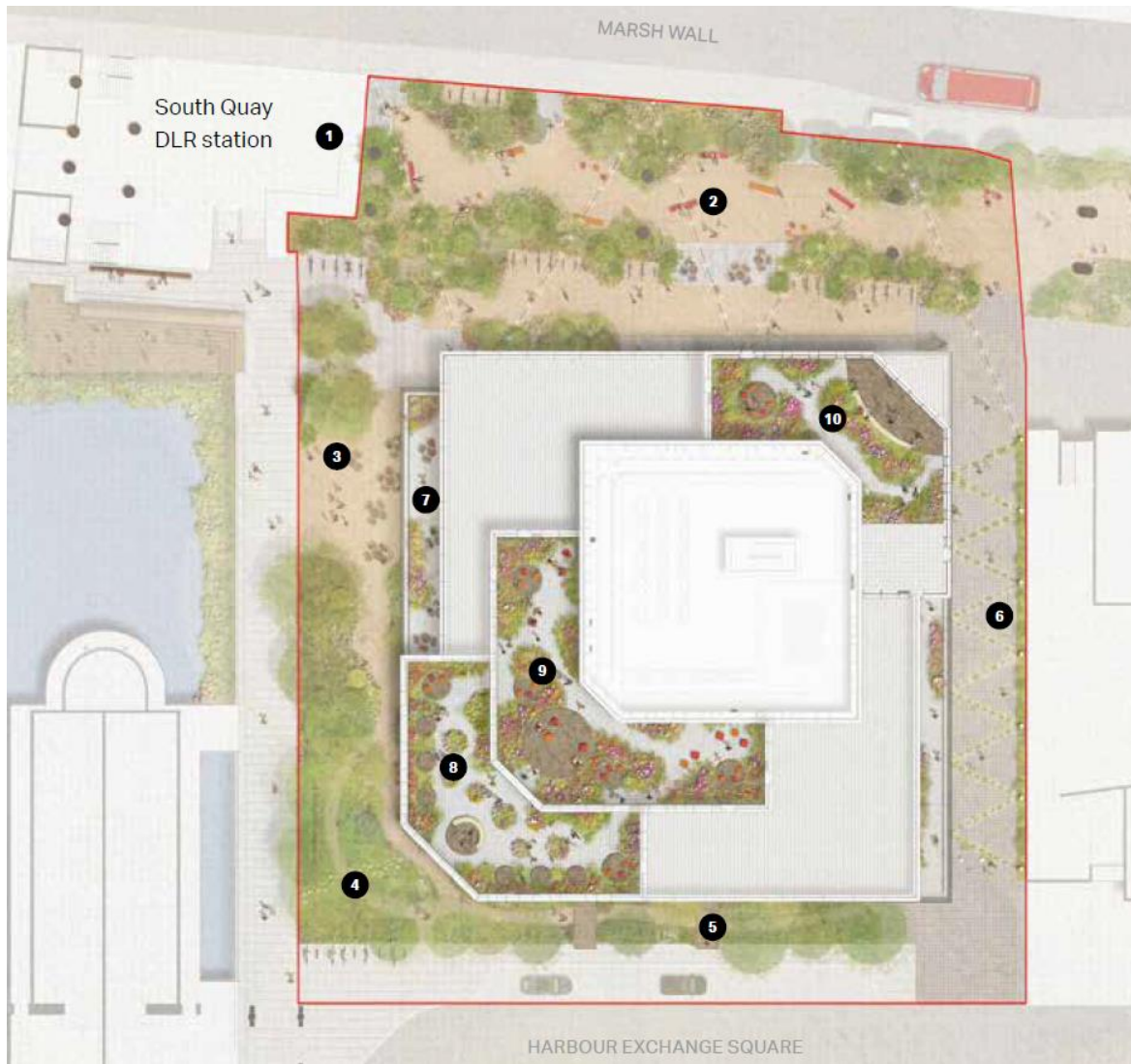
7.125 The proposed development seeks to create a building of a lesser footprint, set back from the dockside allowing more public realm to be created on the site.

7.126 The proposed development represents a landscape-led design response providing interconnected green spaces along the perimeter of the proposed building placed centrally within the site. The proposed building allows for more public spaces along the dockside which would in turn activate these spaces with the proposed ground floor uses, as well as improve the walking and cycling connection in this area.

7.127 The proposed site layout would also create a welcoming arrival point from the South Quay DLR Station due to the proposed set back, as well as a variety of different ground floor uses allowing more activity to take place in this location, which would also extend along Marsh Wall.

7.128 The southern edges of the proposed building would provide residential entrances whilst the proposed street running along the eastern edge of the site would serve as vehicle and cycle access, as well as a servicing space which is accessed from the Harbour Exchange Square as no vehicle access will be provided from Marsh Wall.

7.129 The application site also includes the section below the DLR tracks to the north of the proposed building. This is welcomed as it would significantly contribute to the improvement the appearance and movement in this part of Marsh Wall.



- ❶ South Quay DLR station
- ❷ The underline
- ❸ Waterfront square
- ❹ Garden play area
- ❺ Residents' gardens
- ❻ East Street
- ❼ L01 terrace
- ❽ L24 residents' terrace
- ❾ L41 residents' terrace
- ❿ L48 residents' terrace

Figure 8. Proposed Site Layout.

7.130 Overall, the proposed site layout would provide a successful design response which ensures that a number of principles stipulated in the Site Allocation policy is delivered for this site. As such, the proposed site layout is supported.

Townscape, Massing and Heights

7.131 London Plan (2021) policy D9 provides a strategic guidance for tall buildings in the London area. The policy also sets out criteria which against which development proposals should be assessed and these include visual, functional and environmental impacts. With regards to visual impacts, the policy states that tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views. Tall buildings should also reinforce the spatial hierarchy of the local and wider context and aim legibility and wayfinding.

7.132 In general, Tower Hamlets Local Plan policy S.DH1 requires developments to be of an appropriate scale, height, mass, bulk and form in its site and context. More specifically, Local

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

- 7.133 Policy D.DH6 sets out a number of principles for tall buildings, including that development must demonstrate, amongst other, how they will be of appropriate height, scale and mass that are proportionate to their role, function and important of the location in the local, borough-wide and London context, taking account of the character of the immediate context and of their surroundings. The policy also requires developments to enhance the character and distinctiveness of an area and provide a positive contribution to the skyline.
- 7.134 For the Millwall Inner Dock Tall Building Zone, in which the application site is situated, policy D.DH6 requires building heights to significantly step down from the Canary Wharf cluster to supports its central emphasis, and particularly for building heights to step down from Marsh Wall.
- 7.135 The site's inclusion within a tall building zone (TBZ) confirms the appropriateness of a principle for delivering a tall building on the site. However, any building coming forward on the site should be subject to a set of requirements set out in the Local Plan policy, as discussed in details below with regards to the design requirements.
- 7.136 The proposed building consists to four interlinking, stepped towers, out of which the tallest one placed more centrally would reach an AOD height of 175.5m. The proportion of each of the building steps would be half the height of the preceding one, where the first step has taken cues from the heights of the buildings in the neighbouring developments.
- 7.137 The site is situated at the key junction within the Millwall Inner Dock TBZ representing the western point of the Marsh Wall East section. With regards to its immediate surroundings, the proposed building would be lower than the Madison building which sits within the Canary Wharf TBZ, on the northern side of Marsh Wall to the north-east at the height of 187m AOD. To the east of the site, the highest point of the Skylines development sits at 167m AOD and would provide a further step down from the proposed building.
- 7.138 As confirmed by the LBTH design officer, the proposed building would represent an appropriate townscape and contextual response which ensures the variation in building height remains, where the highest point within the Marsh Wall East townscape area and within the subject TBZ would be the site itself.
- 7.139 The proposed building with its stepping heights would also allow a more distinctive transition and varying heights to take place within the site itself, responding gradually to the heights of the immediate surrounding. In addition, the positioning of the application site at the north end of the Millwall Inner Dock and close proximity to the DLR station ensure that the proposed tall building would be appropriate to both the function and role of the site within the cluster.
- 7.140 Some concerns have been raised with respect to the bulk and mass being created along the diagonal axis of the building. However, the architectural detailing help to ensure that the building is read a series of slender towers, rather than one large form, as discussed in detail below.

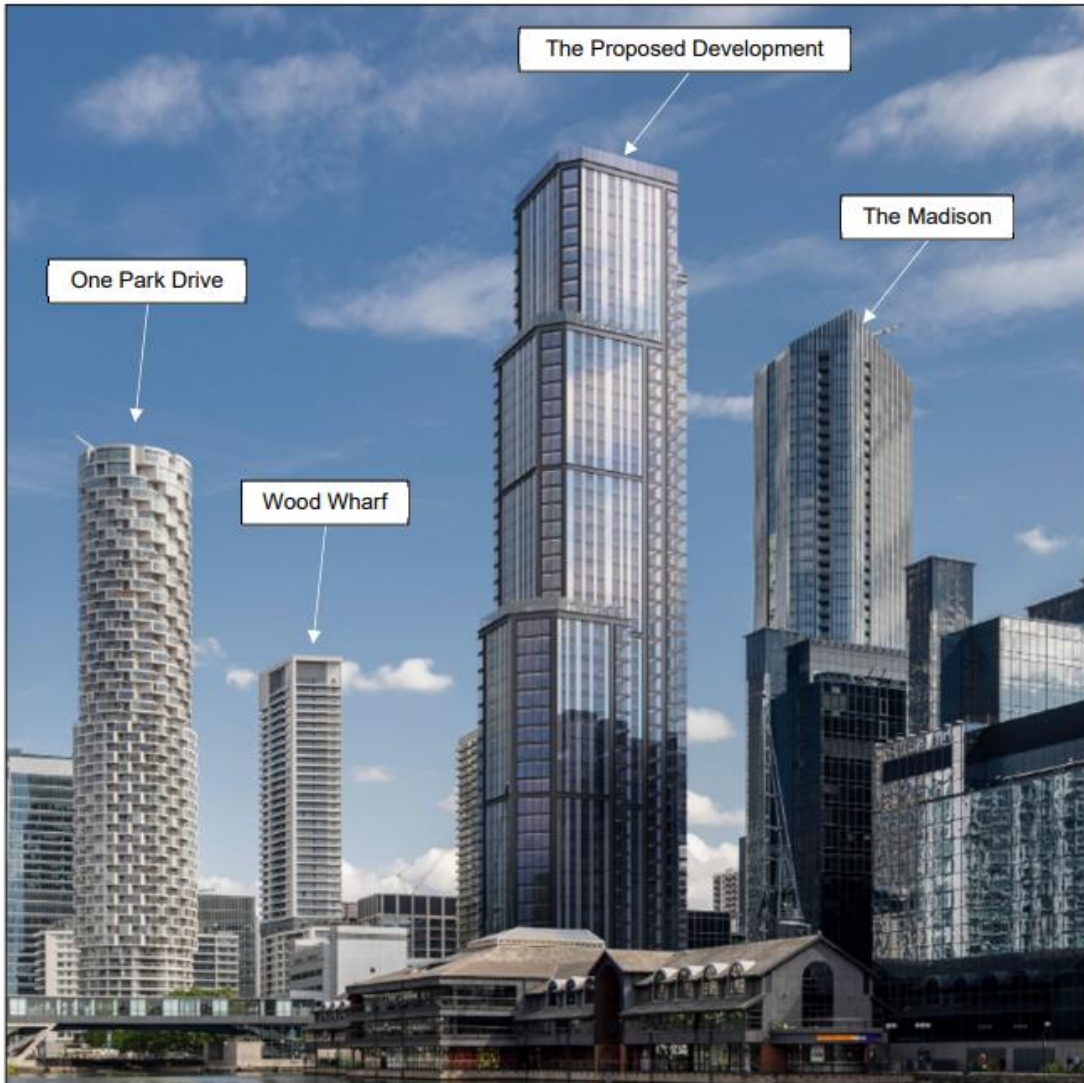


Figure 9. Proposed Development with surrounding existing tall buildings

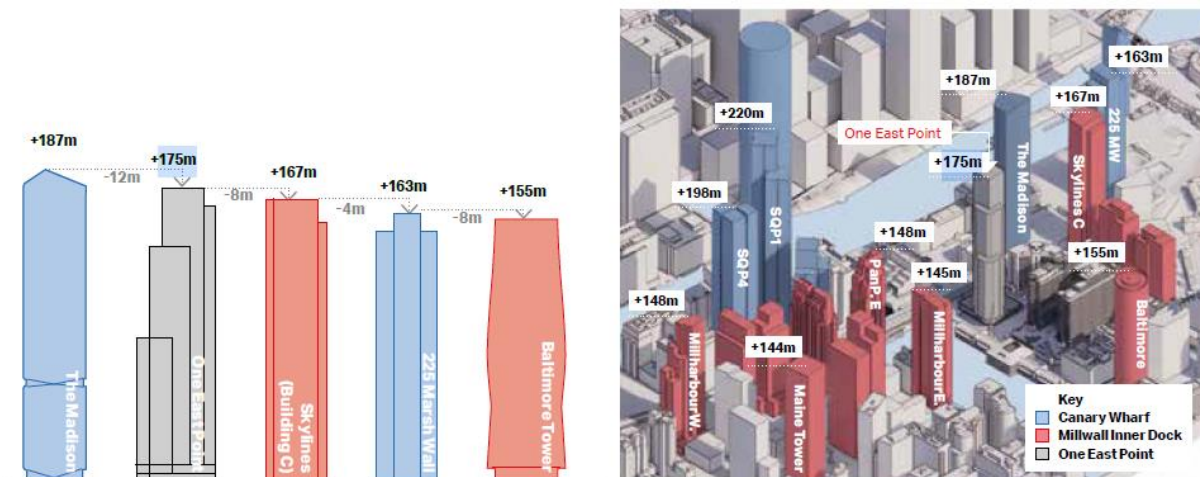


Figure 10. Model of Proposed Development with surrounding tall buildings

Appearance & Ground Floor Frontages

7.141 Tower Hamlets Local Plan policy S.DH1 requires development to ensure that the architectural language completes and enhances their immediate and wider surroundings, and to use high quality design materials and finishes to ensure buildings are robust, efficient and fit for the life of the development.

- 7.142 Tower Hamlets Local Plan policy D.DH6 requires developments with tall buildings to achieve exceptional architectural quality and provide shared facilities at the ground floor level to encourage social cohesion.
- 7.143 The proposed tower has a unitised cladding system comprising of full height dark black painted panels with insulated backing and spandrel panels to match. The metal framing, comprising PPC aluminium panels, has been introduced vertically to highlight the corner winter gardens within the Proposed Development.
- 7.144 In terms of the balustrades and panelling, elements of the façade have been influenced by Frederick Garrad pottery which was manufactured on the Isle of Dogs until 1911. Garrad's tiles were inspired by Spanish Cuenca style tiles and Dutch Delftware tiles and the designs have been used in the design of the Proposed Development's metalwork, including balustrades and wintergarden ventilation panels.
- 7.145 The building has been designed deliberately with a clear podium level, and focuses on delivering active frontages along the dockside and to the north towards the South Quay DLR.
- 7.146 In terms of ground floor frontages, anchoring the north-west corner of the site is a retail unit. As pedestrians leave South Quay station and Marsh Wall, this prominent corner will be activated by an independent retailer that will introduce pedestrians to the site.
- 7.147 The restaurant which is proposed to be located on the west of the ground floor will have high ceilings bringing light deep into the space whilst the bi-fold doors encourage the restaurant to spill out onto the waterfront activating this open space. The terrace level above provides a covered walkway along the elevation and in combined with the doors they create a soft transition between the inside and outside of the building removing any hard building edge and encouraging people into the building.
- 7.148 To the north, a managed, shared entrance is provided to the creative industry space on the first floor and the play space and youth hub on the 2nd floor. These areas can be accessed via an independent lift and stair within the entrance.
- 7.149 The outdoor amenity spaces at Levels 24, 41 and 48 all comprise a full height glazed terrace to protect the space from the local wind microclimate and includes an industrial effect pergola.
- 7.150 The publicly accessible terrace at Level 1 has been designed to support the community uses and provides a dining terrace for the restaurant. This space will benefit from full height glazing with bi-folding doors. The external stairs are a combination of timber and metal. This space will benefit from timber soffits, bringing a rich tone to the façade and refer to the timber shipments that were synonymous with the docks.
- 7.151 Officers consider that the proposed tower would be well proportioned and would be of appropriately high architectural quality. The design and architectural appearance of the proposed building would result in a positive contribution to the built form in the area in both long and medium range views.
- 7.152 In summary, the proposed architectural quality and materiality of the scheme is supported. It is recommended that details of external materials are secured by planning condition.



Figure 11. Ground and first floor level of Proposed Development with a restaurant use

Landscaping & Public Realm

- 7.153 London Plan (2021) policy D8 requires development proposals to ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, and easy to understand and maintain.
- 7.154 Tower Hamlets Local Plan policy D.DH2 requires developments to positively contribute to the public realm through the provision of active frontages and multi-usable spaces that can cater for social gathering and recreational uses.
- 7.155 The design of the proposed development has been landscape-led, which is welcomed. Consequently, this uses the opportunity to deliver high quality public realm along the dock's edge and improve the pedestrian movement in the area.
- 7.156 The submitted Landscape Strategy sets out a tiered approach to the landscaping of the development, creating six different landscape character areas, as indicated in the image below.

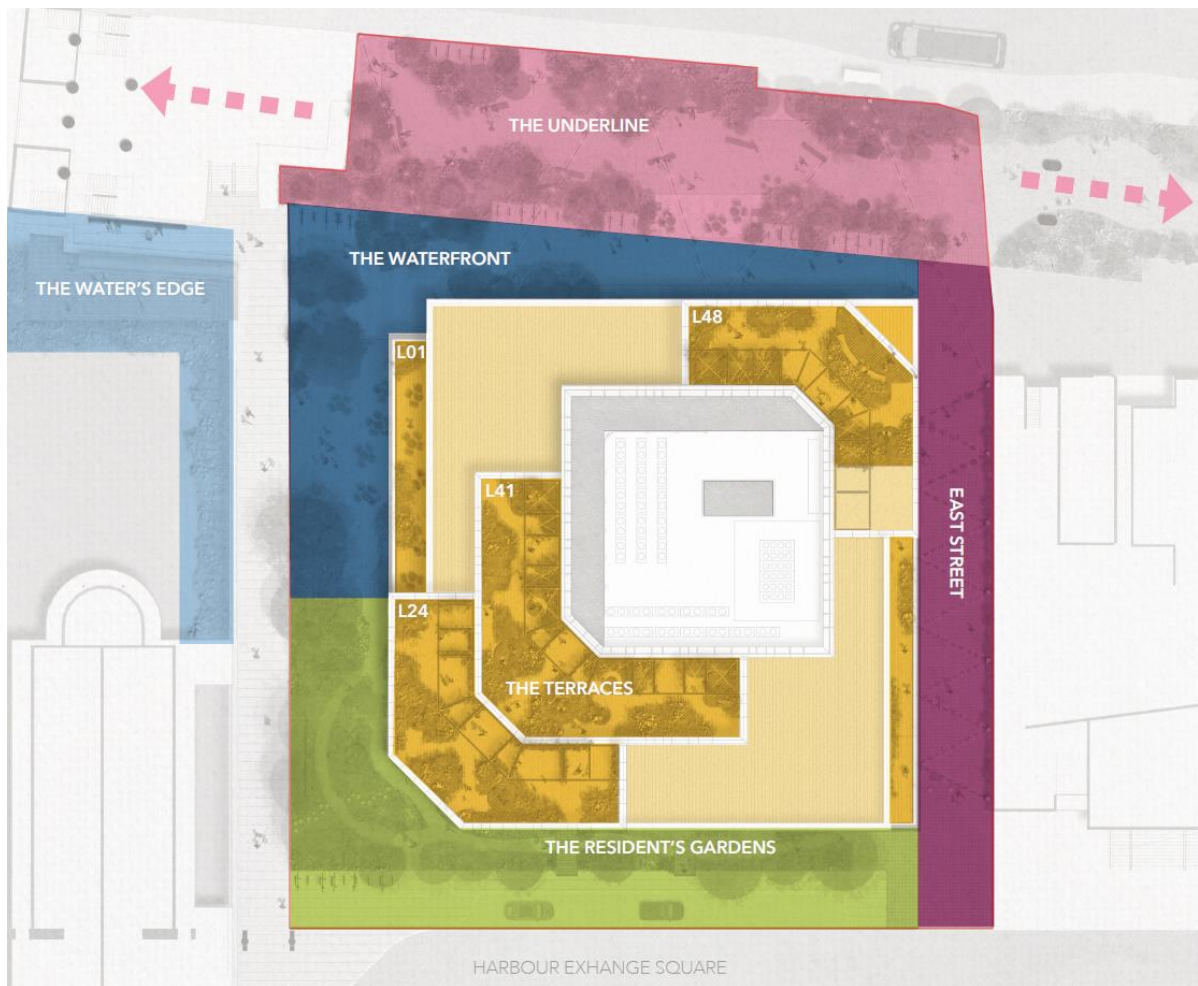


Figure 12. Proposed landscape character areas.

The Underline

- 7.157 The Underline is a new area of public realm beneath the Docklands Light Railway, connecting Marsh Wall to the rest of the site and the Millwall Inner Dock will be transformed from a gloomy tarmac car park into an informal landscaped environment that invites informal play and programmable events such as food markets. This new area of public realm will be supported by the active frontages of the retail and creative industry which are located on the northern elevation of the podium facing it.
- 7.158 Soft landscaping elements include; mixed level low level planting; planting suitable for raingardens and planting suitable for filtering air pollution. Hard landscaping elements include; concrete paving, flexible seating and cycle stands.
- 7.159 The planting palette for the underline has been designed for both environmental function and aesthetic value. The palette contains a high percentage of flowering perennials which will provide nectar for pollinating insects such as bees and butterflies. A mixture of plants that can withstand extended periods of waterlogging and drought resistant species will be prominent in this area.
- 7.160 An east west rain garden is to be provided at the southern extent of 'The Underline' which will help to increase the biodiversity of the site and allow on site water attenuation to reduce the risk of onsite flooding.
- 7.161 The space, which is protected from the road by soft landscaping and the retained existing tree line, creates an attractive alternative pedestrian route to the existing pavement to Marsh Wall and a significant new area of public realm which can be used during both the night and day.

The Waterfront

- 7.162 The waterfront square is an area of public realm with retail frontage and spill out space, which responds directly to the site's dockland setting. Proposed seating will provide opportunities for resting and looking out onto Millwall Inner Dock.
- 7.163 A palette of self-binding aggregate wraps around the north and west of the building creating a gardenesque feel to the open spaces next to the water. Soft landscaping elements include mixed species low level planting and tree planting.
- 7.164 The submitted Landscape Strategy indicated the Water's Edge character area which relates to the dockside floating timber deck pontoon with seating. Whilst the provision of such public realm is welcomed and supported, it should be noted that this area is excluded from the application boundary given that it sits outside of the redline boundary. These details have been included for illustrative purposes and are subject to the applicant's agreement and licensing arrangement with the Canal and River Trust.

East Street

- 7.165 Located to the east of the Proposed Development, East Street is a north-south route connecting pedestrians from Marsh Wall to resident entrances for the Proposed Development and Harbour Exchange Square.

Residents Garden

- 7.166 The resident's gardens are located to the south of the Proposed Development and comprise densely planted gardens with natural timber play area and boardwalk paths, which lead to the resident entrances. The planting palette for the resident's garden comprises of ferns, grasses and shrubs which thrive in shady conditions. The mix will include a large selection of evergreen species.
- 7.167 Clear sight lines beneath the trees and above any planting will be maintained and lighting used at night to ensure the landscape design meets the criteria set out in the Secured by Design standards.

The Terraces

- 7.168 The terraces provide elevated garden spaces for visitors and residents to enjoy. Level 01 terrace provides a large spill-out area for restaurant seating, with pockets of planting and waterfront views framing the space.
- 7.169 Level 24, Level 41 and Level 48 are amenity gardens for residents use. Each upper terrace comprises seating areas amongst areas of open mosaic habitat style planting. Climbing plants are proposed to grow up and along the steel pergolas which run adjacent to the parapet edges. Breaks in the planting create spots for users to enjoy panoramic views of the city.
- 7.170 Overall, it is considered that the Proposed Development delivers significant placemaking benefits, with the creation of new routes through the Site, enhancing the permeability of the area and improving the connection to Marsh Wall and beyond through high quality, dynamic public realm, which provides a network of outdoor spaces which can be used by both residents and commercial occupiers.

Hard Landscaping Strategy

- 7.171 The aim of the hard landscape is to provide a quality environment that is durable and provides a visually interesting and stimulating setting. There will be a range of hard landscape treatments across the site that will contribute to each of the landscape character areas. Self-binding aggregate and timber boardwalks are proposed, with harder connecting paths of clay, natural stone and concrete pavers.

Soft Landscaping Strategy

7.172 The soft landscape strategy will provide a broad range of planting and green spaces across the site that will help to enhance wildlife, improve local biodiversity and integrate into the built environment. The soft landscape will provide a long-term structure of predominantly native species that support a wide range of habitats, characters and amenity.

Tree Planting Strategy

7.173 The landscape design proposes 20 new trees on the ground level of the Proposed Development. A palette of riparian species has been selected to respond to their waterside location as well as for their form, biodiversity benefits and seasonal interest. The trees give height to the planting design and help to form the character of the resident's gardens, to the south of the site.

Lighting Strategy

7.174 The lighting strategy will ensure that the landscape and public realm is a welcoming, safe and attractive environment after dark, whilst aiding way-finding and enhancing visitor comfort. The lighting proposed within planted areas will be wildlife friendly: LED low heat, and emitting only light in the yellow to orange spectrum as nocturnal wildlife would be more affected by UV light and light in the blue spectrum.

7.175 The key lighting strategy for the Proposed Development comprises; catenary lighting, LED footbridge lighting, spike lights and 4m high lighting columns with 2x spotlights.

Conclusion

7.176 Overall, it is considered that the architectural and landscaping design of the proposal is of a high quality and that complies with the requirements of the Local Plan and London Plan. It represents high quality design that responds well to its context in terms of height and its materiality and form is fitting for this part of the Millwall Inner Dock.

Safety & Security

7.177 Local Plan policy D.DH2 requires developments to incorporate the principles of Secured by Design to improve safety and perception of safety for pedestrians and other users, as well as to create opportunity for natural surveillance, particular at ground floor level.

7.178 The proposed development would provide more natural surveillance across the application site and to its immediate surroundings through the provision of active ground floor frontages, as well as the provision and improvements to the lighting which would ensure the increase of perception of safety.

7.179 The Metropolitan Police Designing Out Crime Officer has been consulted and stated no objections to the proposed development, subject to a condition providing details of a Secured by Design strategy.

Built Heritage

7.180 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. Development Plan policies require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.

7.181 The application is supported by a Townscape, Visual and Built Heritage Impact Assessment (TVBHA) which has been included as Volume 3 of the Environmental Statement and provides an assessment of the proposed development on heritage, townscape and visual receptors. The assessments include a study radius of 600m for the built heritage, a 750m radius of the site to understand the townscape impact, and a visual assessment supported by 22 accurate visual representations.

Heritage assets

- 7.182 The south-east edge of the Coldharbour conservation area sits about 250m to the north-east of the application site. The conservation area has a historic shipbuilding interest with 18th and 19th century building along the Thames waterfront and a couple of entrance docks. Several buildings within the conservation area grade II listed.
- 7.183 Along the western edge of the Coldharbour conservation area sits the grade I listed Blackwall basin, with other main docks further to the west, North and South docks, being also listed as grade I listed structures. Outside of the Coldharbour conservation area, but close to the east of its southern edge sits the grade II* listed Isle of Dogs Pumping Station along the Thames waterfront, situated about 440m from the application site.
- 7.184 The locally listed public house The George at 114-114a Glengall Grove is situated about 350m to the south-east from the application site. Further to the east from the George is the grade II listed Carnegie Library.
- 7.185 The submitted TVBHA identified in the assessment that the proposed building would have negligible to minor beneficial impact on the four of the assessed heritage receptors whilst there would be no impact on other heritage receptors due to their positioning. As such, whilst it is likely that there would be a visual connection to the heritage assets, the impact on them would be acceptable.

Strategic views

- 7.186 London Plan policy HC4 provides requirements on the London View Management Framework (LVMF). The policy states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements, as well as the preservation of the landmarks of World Heritage Sites (WHS). Development proposals in designated views should comply with the relevant criteria set out in the policy.
- 7.187 Tower Hamlets Local Plan 2031 policy D.DH4 reiterates the requirement to comply with the LVMF requirements and the WHS Management Plans. Furthermore, the policy requires development to positively contribute to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf; and preservation or enhancement of the skyline of strategic importance in the borough-designated views. In addition, this policy requires development to demonstrate how they preserve or enhance townscape and views to and from the site which are important to the identity and character of the place.
- 7.188 Tower Hamlets Local Plan 2031 policy D.DH5 particularly requires proposals affecting the wider setting of the Maritime Greenwich WHS or those impinging upon strategic or other significant views to or from these sites should conserve and enhance the outstanding universal value of the world heritage sites.
- 7.189 Local Plan policy D.DH4 defines Canary Wharf as Skyline of Strategic Importance (SSI), as shown in the figure below. The Canary Wharf SSI has become a globally recognised silhouette and is a prominent and recognisable feature in views from the surrounding areas, including from a number of designated views, including local ones identified in policy D.DH4, as well as strategic ones set out in the LVMF.
- 7.190 Furthermore, policy D.DH4 requires building heights to positively contribute to the skyline of strategic importance, forming from the silhouettes of tall building clusters around Canary Wharf, which include Canary Wharf cluster and Millwall Inner Dock cluster.
- 7.191 As noted in the Townscape, Height and Massing section above, the proposed building responds appropriately to the height transition in the immediate area providing a contextual design response. As a result, the proposed development would protect the Canary Wharf Skyline of Strategic Importance and how it is viewed from various local and strategic designated views.

7.192 It is considered that the proposed development would meet a number of policies which stipulate the importance of the Canary Wharf townscape area and its designation as Skyline of Strategic Importance.

Archaeology

7.193 The application site lies within the Archaeological Priority Area and the proposed development would include significant excavation to make space for the basement levels of the proposed building. As such, the application has been referred to the Greater London Archaeological Advisory Service (GLAAS) for comment.

7.194 The proposed development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. As requested by GLAAS, a pre-demolition condition has been included to provide further archaeological information.

Neighbour Amenity

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

7.196 It is noted that within the Scoping Opinion LBTH requested that the following residential receptors were to be scoped into the ES Chapter for assessment and/or within a cumulative scenario:

- Pan Peninsula
- Skylines
- 225 Marsh Wall
- 3 Millharbour
- South Quay Plaza
- Arena Tower
- Residential Moorings

7.197 Given the tall slender nature of the scheme and the distance to these receptors, it was agreed that from the façade assessments undertaken as contained within ES Volume 3, Appendix EIA Methodology – Annex 6 that any impacts from the scheme to the daylight and sunlight available to these properties is considered negligible and has been scoped out. In addition, considering the distance that these properties are from the development site, it is agreed again that given the orientation of the windows considered within the residential receptors that there is no requirement to conduct a cumulative assessment and again this has been scoped out.

7.198 In addition, the Applicant has further supplied the information with regards to the assessment for Pan Peninsula with and without balconies to ensure that the worst case scenario has been considered. This has confirmed that the existence of balconies at Pan Peninsula would be the primary restriction of sunlight whilst for daylight considerations the six windows not meeting the BRE guidelines would light rooms also lit by other windows and as such the rooms as a whole would meet the BRE guidelines.

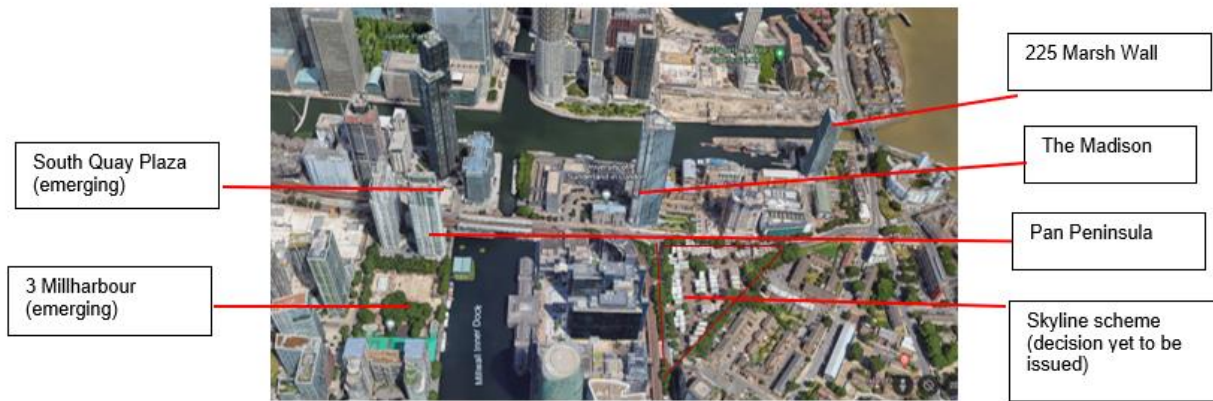


Figure 13. Image showing surrounding cumulative properties

Daylight, Sunlight & Overshadowing

- 7.199 As mentioned above, the relevant guidance for assessing the impact to daylight and sunlight to the neighbouring properties refers to the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2011) given the timing of the submission of the application.
- 7.200 For calculating daylight to neighbouring residential properties affected by the proposed development, the primary assessment is the vertical sky component (VSC) method of assessment together with the no sky line (NSL) assessment where internal room layouts are known or can reasonably be assumed. These tests measure whether buildings maintain most of the daylight they currently receive.
- 7.201 BRE guidance in relation to VSC requires an assessment of the amount of daylight striking the face of a window. The VSC should be at least 27%, or should not be reduced by more than 20% of the former value, to ensure sufficient light is still reaching windows. The NSL calculation takes into account the distribution of daylight within the room, and again, figures should not exhibit a reduction beyond 20% of the former value.
- 7.202 A window is considered to be noticeably affected in terms of sunlight if a point at the centre of the window receives in the year less than 25% of the Annual Probable Sunlight Hours (APSH), including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period. Sunlight is relevant to main living rooms (i.e. habitable rooms) of dwellings and conservatories, if they have a window facing within 90 degrees (o) of due south.
- 7.203 The BRE guidelines state that if the room has multiple windows on the same or on adjacent walls, the highest value of APSH should be taken.
- 7.204 The table below shows the LBTH numerical classifications that are required to be applied for Negligible, Minor Adverse, Moderate Adverse and Major Adverse bandings for daylight (VSC and NSL) and sunlight (APSH and WPSH).

Reduction to daylight (VSC & NSL) and Sunlight (APSH & WPSH)	Effect classification
0 – 20% reduction	Negligible effect
20.1% - 30% reduction	Minor adverse effect
30.1% - 40% reduction	Moderate adverse effect
Above 40% reduction	Major adverse effect

Table 3. Daylight and sunlight effect classification.

7.205 The submitted Daylight, Sunlight and Overshadowing Assessment in support of the application, prepared by GIA, has been included in the Environmental Statement under Chapter 10.

Daylight

7.206 The Madison apartment building is located to the northeast of the site. Only the west, southwest and north west facing windows and rooms face towards the Proposed Development are relevant for assessment and have therefore been tested.

7.207 For VSC, 1,174 of the 1,355 (86.6%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.208 For NSL, 429 of the 432 (99.3%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.209 In terms of ADF compliance, there are no rooms which do not meet the ADF recommendation in the Proposed Development scenario, which are not already below the recommended levels in the baseline scenario. Those 63 bedrooms which do not meet criteria in the baseline scenario see losses of only 0.1-0.2% ADF with the Proposed Development in situ, which is not considered to be a noticeable reduction.

7.210 Therefore, the effect is considered Negligible to Minor Adverse (Not Significant) in terms of daylight.

7.211 Overall, there is a high level of compliance and only five rooms affected, each of which remain well sunlit falling only marginally short of BRE Guidelines recommendation. One instance of a moderate adverse APSH effect occurs, however, continues to see good levels of sunlight and is not affected during winter. Therefore, the effect to this building is considered Negligible to Minor Adverse (Not Significant) in terms of sunlight.

Sunlight

7.212 A total of 166 rooms (bedrooms and living rooms) were assessed for sunlight within the Madison building of which 161 (97%) would meet the BRE's criteria for both Annual and Winter Probable Sunlight Hours (PSH).

7.213 For Annual PSH, 161 of the 166 (97%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

7.214 For Winter PSH, 164 of the 166 (98.8%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining two see losses between 20-29.9% which is considered a Minor Adverse effect.

7.215 Three bedrooms would see minor adverse alterations to APSH, two of which would also see minor adverse alterations to Winter PSH. However, all three bedrooms would retain 21-24% APSH and 3-4% Winter PSH. The impacts may be considered acceptable, given the retain levels of sunlight and that the primary use is for sleeping.

7.216 The remaining two affected rooms are living rooms, seeing minor and moderate alterations in APSH respectively. Both rooms would retain 23% APSH, which is only 2% below the levels recommended in BRE Guidelines. These living rooms would not be affected beyond recommendation for Winter PSH, each continuing to receive 6%, which is above the level suggested in BRE Guidelines.

7.217 Overall, there is a high level of compliance and only five rooms affected, each of which remain well sunlit falling only marginally short of BRE Guidelines recommendation. One instance of a moderate adverse APSH effect occurs, however, continues to see good levels of sunlight and is not affected during winter. Therefore, the effect to this building is considered Negligible to Minor Adverse (Not Significant) in terms of sunlight.

Overshadowing

7.218 The overshadowing assessment considered the impact on five of the surrounding amenity spaces which would all experience acceptable levels of impact as follows:

- South Dock – negligible to minor adverse impact
- Millwall Inner Dock, Millwall Cutting and the adjacent Quay Walk – negligible impact
- Oakland Quarry – major beneficial impact (This is due to the Proposed Development stepping back from the existing building and allowing additional sun to reach this area).

Cumulative Schemes

7.219 Cumulative schemes considered for the future scenario of daylight, sunlight and overshadowing: Skylines, 225 Marsh Wall, 3 Millharbour, Millharbour West blocks G1, G2 and G3, South Quay Plaza and Wood Wharf. however, these are considered to be at a sufficient distance from the Application Site to not result in cumulative effects. This was considered reasonable both by the EIA consultants and the Daylight and Sunlight consultants appointed by the Council.

Solar Glare

7.220 In terms of solar glare effects, a total of 6 viewpoints along surrounding roads and 6 viewpoints from the Docklands Light Railway were assessed for the potential for adverse solar reflection to occur.

7.221 Solar glare occurs when sunlight is reflected from a glazed surface. This can affect road users or train drivers as instances of solar glare are likely to cause substantial visual impairment or distraction. The duration and significance of any potential solar glare effects can depend on the building orientation, façade details including window size and location, balconies and cladding materials.

7.222 Of the 12 assessed viewpoints assessed by GIA, the Proposed Development is not visible at three viewpoints and therefore no impact would occur (views DLRs1, DLRs2 and Marsh Wall W1), at the remaining viewpoints the Proposed Development could cause negligible or minor adverse (not significant) effects with solar glare instances beyond the driver or road users line of sight occurring for a very short period of time. Although there are viewpoints which may, in a worst-case scenario, experience solar glare effects, the applicants daylight sunlight consultants have confirmed that no additional mitigation is deemed necessary. This is due to the short duration of reflections, and the period throughout the year in which this is likely to occur.

7.223 During the ES review of the ES Volume 1 Chapter 10, DLSSL, overshadowing and solar glare, the Council requested the applicant to, at points where reflections are shown to occur close to the centre of a line of vision, provide more detailed calculations. However, the applicants DLSSL consultant disagreed and that performing a further assessment at this stage without details of the glazing and façade specifications could lead to uncertainties in the results. This was accepted by the Council and Temple, as such, a condition shall be attached should planning permission be granted that at a detailed design stage further assessment to check the potential for reflected glare could be performed, in particular for viewpoint E2.



Fig. 12: Site Plan - Viewpoints

- Building visible from the street viewpoint
- Building visible from the rail viewpoint
- Building NOT visible from the viewpoint

Figure 14. Image showing the solar glare viewpoints

7.224 On balance, and in consideration of the worst case scenario relating to solar glare it is considered that the impacts would be acceptable and consistent with the policies in the LBTH Local Plan.

Conclusion

7.225 Overall, the Proposed Development would achieve a very high level of compliance with respect to daylight, sunlight, and overshadowing, and thus accord with the relevant of policies and the BRE Guidelines.

Overlooking, Outlook and Sense of Enclosure

7.226 Tower Hamlets Local Plan policy D.DH8 indicates a distance of approximately 18 metres between windows of habitable rooms in order to reduce inter-visibility between these to an acceptable level.

- 7.227 Whilst the surrounding area is mixed in use with a significant portion of residential use, the existing buildings closest to the application site have established office and educational uses. In addition, the distance between the proposed building and neighbouring ones limits the impact.
- 7.228 Nonetheless, it has been noted that neighbouring sites have been included in the Site Allocations which identify sites for future redevelopment to accommodate new housing and employment uses. The Limeharbour Site Allocation includes the remainder to the Harbour Exchange Estate to the east and south, and the Marsh Wall East Site Allocation is situated to the north of the application site on the opposite side of Marsh Wall. As such, it is important to ensure future proofing of these sites.
- 7.229 For the majority of the neighbouring sites, it is considered that the proposed development is sufficiently distanced to allow for the future redevelopment of the neighbouring sites.
- 7.230 The closest site is 3 Harbour Exchange to the east of the application site. The existing building, 4 Harbour Exchange stretches to the eastern edge of the application site along its boundary with 3 Harbour Exchange. The proposed building has been setback by 9m from its eastern boundary to allow for Eastern Street to be created as a separation distance to allow for future redevelopment of the neighbouring site.
- 7.231 Overall, it is considered that the proposed site layout has been designed in such a way to ensure the current and future impact on the neighbouring buildings.

Noise & Vibration

- 7.232 Part E of policy D13 states that development proposals should not normally be permitted where they have not clearly demonstrated how noise and other nuisances will be mitigated and managed.
- 7.233 Policy D14 of the London Plan requires developments to manage noise by avoiding significant adverse noise impacts on health and quality of life, reflecting the Agent of Change principle and overall ensuring mitigation and minimisation of noise and controlling of any potential adverse effects.
- 7.234 Policy D.DH8 of the Tower Hamlets Local Plan 2031 requires developments to not create unacceptable levels of noise pollution during the construction and life of the development.
- 7.235 Policy D.ES9 of the Tower Hamlets Local Plan 2031 requires development to be designed in such a way to minimise noise and vibration impacts and identify mitigation measures to manage impact.
- 7.236 Part 2 uses the agent of change principle to seek to reduce this phenomenon. This principle may also apply to other noise-generating uses, such as industrial uses. Applicants must submit detailed noise assessments and demonstrate that noise levels within the proposed development emitted from nearby uses would be acceptable.
- 7.237 Chapter 9 of the Environmental Statement has been prepared to address noise and vibration impacts. Noise and vibration monitoring have been carried out across the Site to determine the existing noise environment and aid the assessment of potential noise and vibration impacts from on the proposed development.

Impact on surrounding properties

- 7.238 The Applicant considered the impact on the surrounding properties during the three stages of the demolition and construction works, however, this would be temporary given that it would be associated with construction activities. The effects reported are the following:
- Minor adverse impact during site establishment and demolition: 191 Marsh Wall, 3 Harbour Exchange Square, Exchange Tower, The Madison, South Quay Plaza 4

- Minor adverse impact during excavation and substructure: 11-30 Harbour Exchange Square and 3 Harbour Exchange Square.

7.239 All assessed properties would experience negligible impact during the superstructure works, and from construction traffic. The Madison would also experience minor adverse effects from construction vibration, with other receptors experiencing negligible effects. The impact would be managed by several mitigation measures which would ensure that construction activities follow good practice standards and procedures.

7.240 With respect to the operational stage of the development, the overall impact would be negligible. The plant and mechanical services located within the proposed building would be designed to achieve a negligible effect, and details would be secured via a planning condition. The proposed commercial uses would be managed by a planning condition relating to the operating hours and noise levels.

7.241 The Applicant assessed the cumulative scenario for developments in close proximity to the Application Site which could impact the surrounding receptors in combination during the demolition and construction works happening at the site. The cumulative developments in proximity included 225 Marsh Wall, Skylines Village and South Quay Plaza 2 and 4. All effects were found to be minor adverse, with the Madison being potentially experiencing moderate adverse effects with all developments being construction at the same time.

7.242 A condition shall be secured to ensure that the construction safeguards the existing DLR infrastructure.

7.243 It is stated in the submitted documents that the indicative construction is expected to span over 4 years and 3 months. Further details and appropriate mitigation measures would have been secured via planning conditions and obligations to ensure the minimisation of construction impact to the surrounding area.

Proposed development

7.244 The Applicant carried out a site suitability assessment to consider the feasibility of achieving appropriate internal noise levels for future occupiers, noise levels in external amenity areas, and groundborne vibration.

7.245 For the internal areas, it was found that appropriate glazing specification can meet the indoor ambient noise level criteria as set out in BS 8233:2014, which is acceptable. Similarly, this would be the case for winter gardens. For façades overlooking the DLR railway, façade performance requirements would be based on the maximum night-time noise events.

7.246 For the shared amenity spaces, including child play space on Level 2, ground floor residential amenity, and communal amenity spaces on Levels 24, 41 and 48, the majority of spaces would meet the guidance in BS 8233:2014 which requires the noise levels not to exceed 55 db. However, it has been noted that some areas on Level 2 and ground floor would exceed 55 db. These would be areas closer to the edge of the building due to the proximity of the DLR railway. Additional details would be requested via condition to provide additional screening which could lower the noise levels in these areas.

7.247 It has been noted that some residential units would have fixed windows in order to mitigate any adverse noise levels. The Applicant has considered overheating requirements in such cases and mechanical ventilated and comfort cooled rooms would be secured. This would be the case on north and east facades and on the upper levels of all facades; however, it has been noted that further information would be requested at the condition stage once the detailed design has been further developed.

7.248 From the representation received, it has been noted that the Applicant's noise assessment has not identified the data centre at 8-9 Harbour Exchange Square as a particular noise source. The applicant has confirmed that given that 8-9 Harbour Exchange is an existing building, in accordance with the Agent of Change principle the façade strategy and overheating control strategy for the Harbour Exchange tower proposal takes their existing operations into account.

- 7.249 The application has been reviewed by the council's noise officer who is satisfied that the proposed development overall would be acceptable. Furthermore, council's EIA consultants Temple have advised that the data centre is not in close proximity and partly screened (approximately 160m) as such would need to be very loud to have any affect at the receptor. In terms of noise at the receptor and glazing etc, with windows closed the internal noise level will need to meet levels in BS8233, the detailed design stage will go into more detail and specify actual façade make up and overheating controls.
- 7.250 Notwithstanding this, a condition shall be attached should planning permission be granted requiring the applicant to submit an updated noise assessment to include the recent planning consents which were granted at 8-9 Harbour Exchange (references: PA.23.1021 and PA.23.1022) since this application was submitted and to ensure the internal noise levels of the proposed residential units meet criteria in BS8233 and overheating mitigation measures are in line with approved documents. Such condition would also represent an opportunity to secure additional mitigation (such as better performing glazing etc.) if this is deemed necessary at the time of review.
- 7.251 In summary, the proposed residential units would not be subjected to unacceptable noise conditions. Conditions would be secured to ensure that residential units were protected from noise generating plant equipment and to ensure new accommodation is constructed to appropriate standards with regard to acoustic insulation.
- 7.252 Subject to the planning conditions, officers consider that the proposed new homes would have an acceptable noise environment and that the proposed development does not cause unacceptable noise impacts on existing surrounding homes.

Transport

- 7.253 Development Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.
- 7.254 The submitted information relating to transport considerations and impact has been included within Chapter 7 of the Environmental Statement. A standalone Transport Assessment has also been submitted in support of the application.

Vehicular, pedestrian and cycle access and movement

- 7.255 The existing vehicle access into the Harbour Exchange Estate is provided from Limeharbour, immediately to the south of buildings 1 and 2. The vehicle movement arrangement associated with the proposed development would utilise the existing vehicle access along Harbour Exchange Square from south to north.
- 7.256 Situated along the eastern edge of the application site, Eastern Street which would be a one-way northbound route and would provide further vehicle movement to service the proposed building and provide access to the car park lifts, from which the vehicle movement would follow the road around 3 Harbour Exchange exiting on Limeharbour to the north of buildings 1 and 2.
- 7.257 In addition, the proposed Eastern Street would limit the vehicle movement along the northern edge of application site which at present is allowed as a two-way route within this part of the estate. The proposed one-way route allowing movement to the east would ensure the improvement to the pedestrian movement along this part of Marsh Wall and towards the DLR station, also allowing the proposed building to have a better interaction with the activated DLR space also forming part of the proposals.
- 7.258 In terms of cycle access, the submitted information shows that the main cycling routes would be along the dockside and along Eastern Street. The proposed cycle parking entrance would be on Eastern Street where the two cycle lifts are proposed to the basement area.
- 7.259 In general, the proposed access arrangement for pedestrians is allowed along all perimeters of the proposed building. The improvement to the movement along the dockside with the

creation of a more generous north-south route and a more pleasant environment along Marsh Wall are of particular importance for pedestrian movement in the wider area.

- 7.260 The dockside route would be shared between pedestrians and cyclists whilst Eastern Street would be shared amongst different movement modes, including pedestrians, cyclists and vehicles, including servicing and waste collection vehicles. As such, adequate separation would be of the most importance to ensure safety of all users of all spaces, which would be secured via condition.
- 7.261 Overall, the proposed access and movement arrangements are considered acceptable and would contribute to the improvement in movement which would benefit the wider area.

Deliveries & Servicing

- 7.262 The proposed deliveries and servicing associated with the development would take place within the dedicated servicing bays along Eastern Street forming part of the site, accessing and exiting the site through the Harbour Exchange Estate as detailed above.
- 7.263 No objections were raised by Transport for London and LBTH highways team to the proposed arrangement. A Deliveries and Servicing Management Plan will be secured via condition to provide further detailed information prior to the occupation of the development.

Car Parking

- 7.264 London Plan policy T6 encourages car free development through the provision disabled persons parking in line with policy T6.1 which requires the provision of disabled persons parking for new residential developments ensuring 3% provision from the outset with additional 7% to be provided upon request. The policy also states that new residential car parking spaces should provide at 20% of active charging facilities with passive provision for all remaining spaces.
- 7.265 Tower Hamlets Local Plan policy D.TR3 requires all residential developments to be permit free and that all parking associated with the development should be provided off-street.
- 7.266 The existing buildings have 57 car parking spaces available, out of which the majority is provided within the basement areas, and 5 spaces are provided in front of the building. The proposed development would result in the overall reduction in car parking which is supported.
- 7.267 The proposed development would be car free and would be secured through a planning obligation. The exception would be the proposed wheelchair accessible parking space catering for the wheelchair units within the proposed development.
- 7.268 The applicant has indicated the provision of 14 blue badge parking spaces, all fitted with active electric charging points, which equates 3% of the residential units. This is considered acceptable with regards to an initial allocation and the provision of these spaces with the infrastructure for electric charging is welcomed.
- 7.269 The remaining 7% of car parking spaces would be secured via condition for a Car Parking Management Plan. All of the proposed parking spaces within the development would be fitted with the infrastructure passive electric charging points, with 20% including active charging facilities, which is welcomed.

Cycle Parking and Facilities

- 7.270 London Plan policy T5 sets out the minimum cycle storage requirements for each of the land uses. For residential developments, the size of units dictate the minimum standards, as summarised in the table below.

Unit size	Long-stay	Short-stay
Studio and 1-bedroom 1-person unit	1 space	2 spaces for the first 40 units thereafter: 1 spaces per 40 units
1-bedroom 2-person unit	1.5 spaces	
2+bedroom unit	2 spaces	

Table 4. Minimum cycle parking requirements for residential use.

7.271 London Plan policy T5 also sets out the minimum cycle parking requirements for other non-residential uses. It should be noted that the requirements in the London Plan do not refer to the new Use Class E, but its predecessor use class. Given that the proposed development would have a mix of uses under the Use Class E, the table below summarises the minimum cycle parking standards for each of the uses as set out in the London Plan.

Use Class	Long-stay spaces [per Gross External Area]	Short-stay spaces [per Gross External Area]
Class E (formerly A1)	1 space per 175 sqm	first 750 sqm: 1 space per 20 sqm thereafter: 1 space per 150 sqm
Class E (formerly A2-A5)	1 space per 175 sqm	1 space per 20 sqm
Class E (formerly D2)	1 space per 8 full-time staff	1 space per 100 sqm
Class F (formerly D1)	1 space per 8 full-time staff	1 space per 100 sqm

Table 5. Minimum cycle parking standards for non-residential uses.

7.272 The proposed development would provide 822 long-stay residential spaces against the minimum requirement of 760 spaces. All of the spaces would be provided within the basement level, access via the cycle lifts from Eastern Street. The residential element of the proposed scheme would result in a requirement of 13 short-stay spaces.

7.273 With regards to the non-residential spaces, the proposed development would generate a minimum requirement of 6 long-stay and 42 short-stay spaces. 36 Sheffield stands providing 72 spaces would cater for all non-residential spaces and residential short-stay spaces. These spaces would be provided within the public realm around the building, mainly in the south-western corner of the site near the residential entrances, and to the north of the building within the DLR public realm.

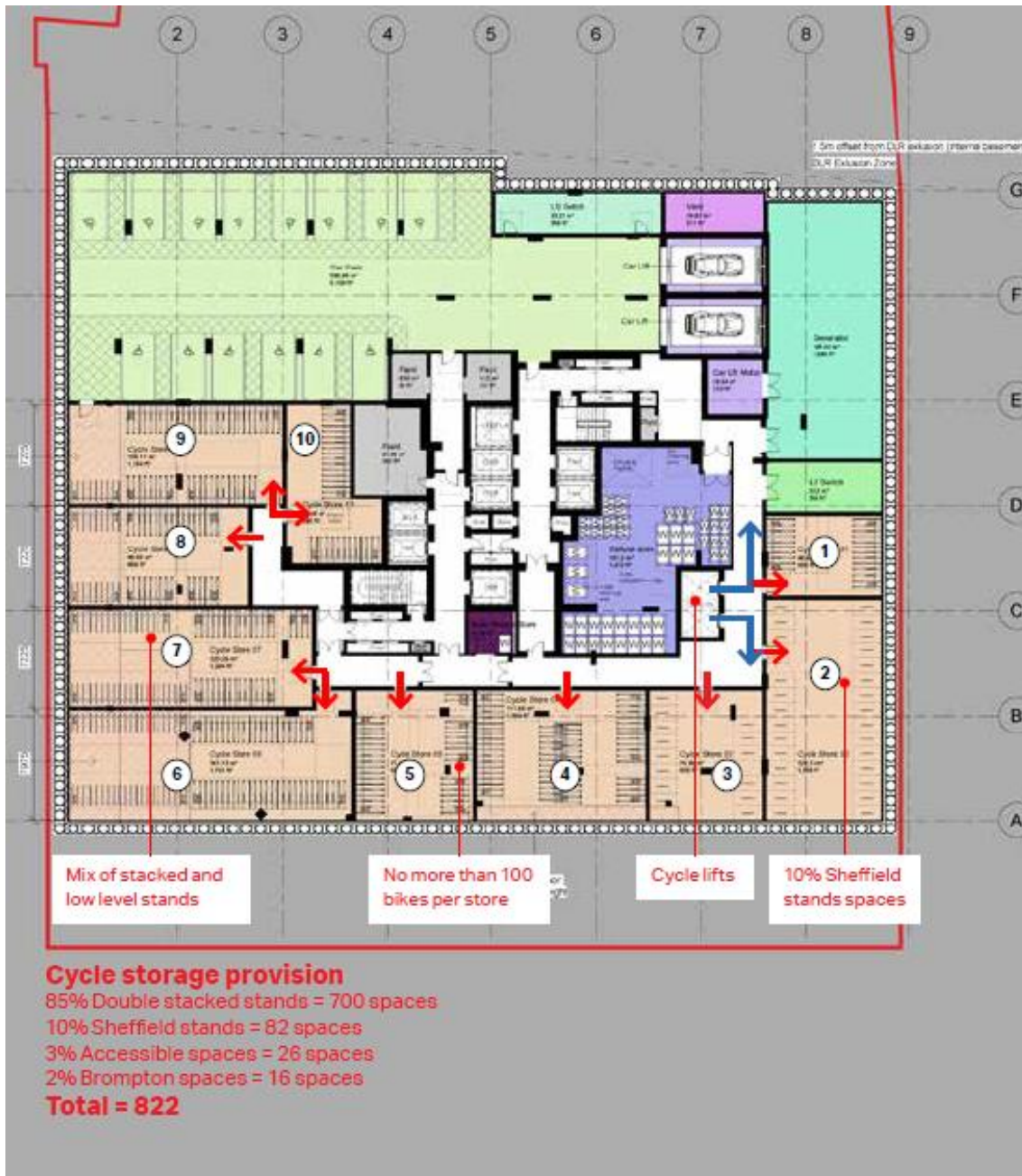


Figure 15: Basement cycle parking

7.274 The overprovision of the cycle spaces for the proposed development is welcomed. The proposed long-stay spaces would be provided as a mix of spaces, in order to cater for a variety of different bikes, including non-standard and adapted bikes. Details would be secured via condition to ensure the compliance with the London Cycling Design Standards.

Trip generation and Public Transport

7.275 The application site has a Public Transport Accessibility Level of 4, indicating good access to the public transport network.

7.276 The applicant has provided details on the estimated trips associated with the proposed development. Whilst the applicant has not provided details on the public transport line capacity assessment, it has been confirmed by TfL that it is not expected that the proposed scheme will require specific mitigation measures. However, further details were requested as part of the stage 1 in relation to the impact on the adjacent bus stop during construction period.

7.277 The applicant has confirmed that during the construction phase of the project all construction vehicles are anticipated to route to/from the east, thus no construction vehicles are

anticipated to route past this bus stop. Construction vehicles, as per the submitted Environmental Impact Assessment (EIA) are anticipated to account for a change in daily traffic along Marsh Wall of 12.5%. The findings of the EIA concluded this change in traffic as negligible. Therefore, a negligible impact on bus journey times and thus reliability is anticipated as a consequence of construction vehicles along Marsh Wall.

7.278 A Construction Traffic Management Plan (CTMP) is anticipated to form a condition of consent, in which the anticipated demolition/ construction strategy will be set out including for example location of hoarding / compounds, equipment etc. This CTMP will require to be approved in consultation with the local authority and TfL. Based on the construction strategy to date no impact is anticipated at this bus stop, moreover due to the location of the DLR tracks it is anticipated that exclusion buffers and carefully planned activities will be necessary to mitigate any interaction with the DLR track and by implication this bus stop. No impact is anticipated on the bus stop itself, the immediate footway, or the vehicle carriageway thus no impact is anticipated on journey times.

7.279 As requested by TfL, conditions relating to the safeguarding of the DLR network during construction and the lifetime of the development will be secured.

Travel Planning

7.280 A framework Travel Plan has been submitted in support of the application. TfL have suggested further emphasis to be placed on encouraging active travel. As such, a final Travel Plan will be secured via condition to ensure that this has been addressed, which would be secured for construction, and residential and commercial elements of the proposed development.

Active Travel and Healthy Streets

7.281 The applicant carried out the Active Travel Zone assessment using the Healthy Streets indicator to key destinations within the 20-minute cycle catchment area for the site.

7.282 The proposed development would contribute to the improvement of the pedestrian and cyclist movement within and along the perimeter of the application site, which would benefit the wider area.

7.283 As requested by TfL and LBTH highways officer, particular highways and public realm improvements outside of the application site boundary would be agreed and secured through a section 278 agreement. In addition, a financial contribution towards Legible London wayfinding would be secured as requested by TfL.

Construction

7.284 The surrounding area has experienced a significant volume of construction throughout the years. Conditions will be secured in relation to the Construction Environmental Management and Logistics Plans to ensure that impact on the area is managed prior to any development works taking place.

Summary

7.285 As detailed in the sections above, it is considered that the proposed development would comply with the planning policies and objectives which seek to ensure that impact on the highways network has been minimised and that future occupiers would be provided with suitable parking facilities.

Environment

Environmental Impact Assessment

7.286 The proposed development represents Environmental Impact Assessment (EIA) development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and is accompanied by an Environmental Statement (ES) coordinated by Trium.

- 7.287 Regulation 3 prohibits the Council from granting planning permission without consideration of the 'environmental information' that comprises the ES, including any further information submitted following request(s) under Regulation 25 and any other information, any representations made by consultation bodies or by any other person about the environmental effects of the development.
- 7.288 The submitted ES assesses the environmental impacts of the development under the following topics:
- Socio-Economics;
 - Traffic and Transport;
 - Air Quality;
 - Noise and Vibration;
 - Daylight, Sunlight, Overshadowing and Solar Glare;
 - Wind Microclimate;
 - Archaeology;
 - Ground Conditions;
 - Greenhouse Gases; and
 - Water Resources and Flood Risk.
 - Townscape, Visual and Built Heritage Impact Assessment (separately provided within Volume 2 of the ES).
- 7.289 The ES has been reviewed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (EIA Regulations).
- 7.290 The application has been supported by an ES and Updated Non-Technical Summary (November 2022), One East Point ES Clarifications and Potential Regulation 25 Request Responses (2nd November 2022), One East Point Formal Review Report Response (December 2023). The IRR response One East Point ES Clarifications and Potential Regulation 25 Request Responses containing additional environmental information was considered to be 'further information' under Regulation 25 for which the relevant consultation was carried out in accordance with the legislation requirements.
- 7.291 The Council appointed Temple Group to independently examine the ES to confirm whether the ES satisfies the Regulations. This review consists of the Interim Review Report (dated 10/08/2022), Final Review Report 001 (dated 27/09/2023) and Final Review Report 002 (dated 05/02/2024). outlined wind mitigation measures have been incorporated into the landscaping proposals, which ensure that the remaining outstanding point from Final Review Report 002 is acceptable.
- 7.292 During the construction stage of the proposed development, significant moderate adverse effects reported in the ES would relate to archaeology as a result of the proposed ground works, and townscape area TCA 4: London Arena/ Millwall Inner Dock as a result of the visible construction equipment. There would also be significant minor beneficial effects to groundwater and surface water as a result of the proposed remediation works during the early construction.
- 7.293 During the operation of the proposed development, the ES reported that there would be no significant adverse effects. In terms of significant beneficial effects, there would be major beneficial effects with regards to daylight, sunlight, overshadowing and solar glare topic as a result of the reduced overshadowing to Oakland Quay Walk, moderate beneficial effects with regards to visual receptors within the South Quay DLR Station (View 15), and minor beneficial effects to critical drainage area and water supply assessed under the water resources and flood risk topic.

- 7.294 The Council's EIA Officer and the Council's appointed EIA consultants have confirmed that the submitted ES, including the subsequent ES submission as set out above, meets the requirements of the EIA Regulations.
- 7.295 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the proposed development, which forms the basis of the assessment presented in the report.
- 7.296 Appropriate mitigation and monitoring measures as proposed in the ES, as well as any additional recommended measures included within the ES review reports, will be secured through planning conditions and planning obligations. The environmental information comprises the ES, including further information and all other information, any representations made by consultation bodies and by any other person about the environmental effects of the proposed development.

Air Quality

- 7.297 London Plan policy S11 and Tower Hamlets Local Plan policy D.ES2 require major developments to submit an Air Quality Assessment demonstrating to meet or exceed at least Air Quality Neutral standard.
- 7.298 The submitted information relating to air quality has been included in Chapter 8 of the ES. It is important to note that the whole borough designated as the Air Quality Management Area.
- 7.299 The Applicant carried out the local air quality monitoring review from local stations to determine the conditions on the Site. The carried-out assessment is considered to be acceptable, however, additional information has been requested with regards to the impact from construction and operational phase traffic given that the existing occupancy on the Site is low and the Proposed Development would exceed the criteria for a detailed assessment.
- 7.300 In terms of comments made from the GLA within their stage 1, they requested the following points be addressed:
- Justify the approach taken for construction traffic assessment;
 - Use mitigation/redesign to appropriately locate the exhaust from the emergency diesel generator to ensure adequate dispersion of emissions from discharging stacks and vents; and
 - Mitigation measures are required to ensure that the impacts of construction activities on this site are not significant, and controls on NRMM.
- 7.301 In terms of the first point, the construction traffic assessment has been resolved in the final ES response (FRR002). The applicant confirmed that as it was not possible to model the baseline traffic flows for the construction traffic modelling, the absolute changes in concentrations were presented in ES Volume 1, Chapter 8: Air Quality, with no verification applied. This showed that the maximum process contribution from the construction traffic was predicted to be 0.03µg/m³ annual mean NO₂ in 2024. Using the EPUK/IAQM approach to determine impact descriptors, the process contribution would need to exceed 0.2µg/m³ for the construction traffic to have anything other than a negligible impact on air quality, regardless of the baseline concentrations. Therefore, the verification factor would need to be greater than or equal to 6.7 before the process contribution exceeded 0.2µg/m³. Based on verification factors calculated for other modelling studies in the public domain undertaken close to the Proposed Development (Park Place; verification factor 1.9, North Quay; verification factor 2.3), it is considered very unlikely that the construction phase would lead to anything other than a negligible impact on air quality at existing receptor locations. As such, an update to the assessment of construction vehicle emissions was agreed not to be required.
- 7.302 Whilst the impact from construction traffic would be negligible and as such not significant, the impact from construction dust would be considered through the set of standard mitigation measures which would ensure that the effects are not significant. These mitigation measures would be secured via condition.

- 7.303 In terms of site suitability, the LAEI modelled concentrations for 2019 were presented in the ES Volume 1, Chapter 8: Air Quality to indicate that there are no locations within the site boundary where the annual mean objectives are predicted to be exceeded. The site includes one partial grid square in which the predicted annual mean NO₂ concentration is between 36µg/m³ and 38µg/m³.
- 7.304 The proposed new building will be set back from Marsh Wall, on the south side of the DLR line, and will not be included within that grid square. As such, concentrations at the building façade are expected to be below 34µg/m³ and therefore no modelling is required.
- 7.305 In relation to the 2nd concern raised by the GLA, the proposed development would include an emergency diesel generator on the ground floor, discharging at the east façade, approximately 3.5m above the ground floor level.
- 7.306 In terms of the generator emissions, the applicant has stated that specific information on the diesel generator was not available at the time of submission, therefore the assessment is based on the assumptions provided by Meinhardt, the project's Energy Consultant and referenced in ES Volume 3, Appendix: Air Quality – Annex 8. It should be noted that due to the height of the building and the offsets required, this precluded the MEP Strategy from running the flue to roof level. The testing schedule will undergo two service visits per year and the life safety generator will run offload for 10-15 minutes during each visit. Each service visit will be arranged to cause minimal disruption. The generator will not be operational for '18 hours or more during the year' as stated in the IRR unless there is a fire. The generator forms part of the life safety equipment and will only be operating when the site's electrical supply fails during an emergency. Officers consider that the information provided is considered sufficient to address this concern. Furthermore, should planning permission be granted, a condition will be attached restricting the generators use to operate for emergencies, and following testing and servicing, only.
- 7.307 In addition, the LBTH's air quality specialist raised concerns with regards to the location of the proposed generator and its proximity to the residential units on the third floor. It was requested to enclose the end extremity of the flue and include PM_{2.5} and NO_x filters, which will be secured via condition. It has been noted that the impact from the emergency generators as well as the operational traffic from the proposed development would be negligible and as such not significant.
- 7.308 With reference to the final issue raised by the GLA, in terms of the NRMM, a compliance condition shall be attached to any consent should permission be granted.
- 7.309 The proposed development would incorporate non-residential uses which could incorporate a commercial kitchen. The potential odours from the commercial uses would be managed via condition, as recommended by the LBTH air quality officer.
- 7.310 The submitted information confirms that the proposed development would be air quality neutral. The application is also supported by an Air Quality Positive Statement which sets out how air quality considerations have been taken into the design of the scheme.
- 7.311 The Applicant carried out a site suitability assessment to consider the relevant exposure of future occupiers and users to the pollutants.
- 7.312 The proposed development would be set back from Marsh Wall where the traffic emissions would occur. The emissions would be highest on the ground floor and as such, any proposed residential use would occur from Level 2 upwards.
- 7.313 The assessment has concluded that the pollutants concentrations at the proposed development are likely to be below the air quality objective, meaning that the air quality conditions for future occupiers would be acceptable.

Biodiversity and Ecology

- 7.314 London Plan policy G6 and Tower Hamlets Local Plan D.ES3 require developments to protect and enhance biodiversity. In addition, London Plan policy G5 recommends a target score for Urban Greening Factor (UGF) of 0.4 for predominantly residential development.
- 7.315 The application is supported by a Preliminary Ecological Appraisal and a Landscape and Public Realm Strategy Report, which provide the relevant information on the biodiversity and ecology matters.
- 7.316 The original submission included green roofs on the ground floor along the eastern elevation of the new north/south access route to the east of the building as well as on the steel pergolas to the terraces on levels 24, 41 and 48. However these are not supported by officers due to management and maintenance issues and the GLA requested that green walls be removed as part of the stage 1 comments.
- 7.317 Officers raised specific concerns regarding the proposed green wall on the north eastern corner (level 48) and ground floor along the north/south access route as it is not considered to be suitable locations and would require intense management to keep alive. As such, the applicant agreed to remove these two areas and it was agreed that the green walls on south western elevations levels 24 and 41 can remain. The revised plans were received on 27.03.24.
- 7.318 The revised proposal would achieve an Urban Greening Factor of 0.38 and deliver net gains. Whilst this falls short of the 0.4 aspiration of Policy G5 of the London Plan, officers consider that on balance providing urban greening, which is successful, and works, is better in the long run than providing green walls which will not survive and would fail to provide the calculated UGF.
- 7.319 The habitats present on site comprised an existing building, an area of hardstanding, with urban trees and introduced scrubs. The biodiversity value of the site prior to clearance was calculated as 0.32 biodiversity units. The Proposed Development includes areas of intensive green roof, urban trees, rain gardens and ground level planters. The biodiversity value of the current landscaping proposals is predicted to be 0.96 biodiversity units. The Proposed Development is predicted to result in a potential biodiversity net gain of 0.64 biodiversity units and a net percentage change of +204.41%.
- 7.320 The Council's Biodiversity Officer has no objection subject to the approval of biodiversity enhancement measures. It is recommended that these, together with a Landscape Ecological Management Plan (LEMP) to cover the long-term maintenance of retained and newly created on-site habitats, are secured by condition.

Energy & Environmental Sustainability

- 7.321 Generally, a decarbonisation agenda has been adopted at all planning policy levels. Policy SI2 of the emerging London Plan requires major development to be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy.
- Use Less Energy (Be Lean),
 - Supply Energy Efficiently (Be Clean),
 - Use Renewable Energy (Be Green), and
 - Monitor and report (Be Seen).
- 7.322 Policy D.ES7 includes the requirement for non-residential developments to be zero carbon with a minimum of 45% reduction in regulated carbon dioxide with the remainder to be offset with cash payment in lieu.

Energy

- 7.323 At a national level, the National Planning Policy Framework sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and

providing resilience to climate change. The climate change policies as set out in the London Plan 2021 and the Borough's Local Plan Policy D.ES7 collectively require new development to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.

- 7.324 Local Plan Policy D.ES7 requires zero carbon emission development to be achieved through a minimum 45% reduction in regulated carbon dioxide emissions on-site, and the remaining regulated carbon dioxide emissions to 100%, to be off-set through a cash in lieu contribution. This is applicable to all developments.
- 7.325 The submitted Energy Assessment and Sustainability Strategy (April 2022) sets out how the proposal seeks to reduce energy demand through energy efficiency measures, a low carbon heating and hot water system (communal Air Source Heat Pump system). A communal ASHP high temperature network will provide heat to all residential apartments which will now allow the full residential heat load to be available to a future DHN. The applicant has adjusted the original strategy for the prevention of overheating to the residential apartments and each apartment affected by high external noise levels will be provided with a MVHR cooling module in lieu of the ambient loop/active cooling system. It has been confirmed that all apartments and non-domestic building uses will be connected to the heat network.
- 7.326 Renewable energy generating technologies are noted as 8kWp photovoltaic array. The Council's sustainability officer has reviewed the proposal and notes that the drawings suggests that the PV areas indicated might be more intensively used and generate more renewable energy, for instance, with a closely packed E/W facing low angle arrangement. The Council's sustainability officer also recommended that PV continues to be investigated for further opportunities to integrate PV into amenity areas. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.
- 7.327 The proposed scheme has the following CO2 emission profile:
- Resi Baseline – 413 tonnes CO2 per annum
 - Resi Proposed Scheme – 158.1 tonnes CO2 per annum
 - Non-Resi Baseline – 64.1 tonnes CO2 per annum
 - Non-Resi Proposed Scheme – 26.9 tonnes CO2 per annum
 - Site wide Baseline – 477.1 tonnes CO2 per annum
 - Site wide Proposed Scheme – 185 tonnes CO2 per annum
- 7.328 The carbon offset contribution (to be secured through the s106 agreement subject to approval) is to be based on all residual emissions as per above. The total on-site site wide CO2 emission reduction is anticipated to be 61% against the building regulation baseline. The proposals are for a 292.1 tonnes/CO2 reduction in on-site emissions and would result in a carbon offsetting contribution of £527,250 to offset the remaining 185 tonnes CO2 and achieve net zero carbon.

Environmental sustainability

- 7.329 Policy D.ES6 requires new residential development achieve a maximum water use of 105 litres per person per day, to minimise the pressure on the combined sewer network and to demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve the development, taking into consideration the cumulative impact of current and proposed development.
- 7.330 Local Plan Policy D.ES7 states 'All new non-residential development over 500 square metres floorspace (gross) are expected to meet or exceed BREEAM 'excellent' rating'. In addition, Local Plan policy D.ES7 and Neighbourhood Plan policy SD1 encourage residential buildings to meet the Home Quality Mark.
- 7.331 Movement and transport, Landscape and ecology, air quality, noise, daylight and sunlight, flood risk and drainage are addressed in detail in other sections of this report.

- 7.332 *Building Performance.* The submitted Sustainability Strategy indicates that the retail and communal spaces will achieve a BREEAM rating of 'Excellent' which is supported by officers. It is recommended that a planning condition secures this.
- 7.333 *Construction waste.* The applicant's Sustainability Statement states that it would put in place waste management systems during the (demolition) and construction phase to minimise waste, including the sorting and recycling of waste. A Site Waste Management Plan will be secured by planning condition.
- 7.334 The applicant also provided a Circular Economy (CE) and Whole Life Carbon Assessment prepared by Meinhardt as part of the submission.

Circular Economy

- 7.335 The application has been accompanied with a detailed Circular Economy Statement that sets out key circular economy commitments for the proposed development which include but not limited to as summarised below:
- 7.336 *Conserve Resources:* The Proposed Development has been designed to ensure that material and resources are effectively used, managed and reduced as far as possible, in accordance with the GLA first principle of the circular economy. The development has also ensured that material quantities and other resources are minimized, responsibly and local sourced throughout the development process.
- 7.337 *Eliminate Waste:* The Proposed Development has also been designed to eliminate waste generation as far as possible, in accordance with the GLA second principle of circular economy. The development has been designed to be flexible and adaptable, therefore increasing the building durability and longevity and thereby reducing construction, demolition, and excavation waste arising.
- 7.338 *Manage Waste Sustainably:* The Proposed Development has been designed to manage waste sustainably, in accordance with the GLA third principle of the circular economy. A demolition and construction audit along with a site-specific Site Waste Management Plan, was carried out to help set a target, manage and divert construction waste from the landfill. Moreover, a Refuse Management Plan was submitted with the application which covers normal waste as well as recycling for the building once occupied. which was developed to help with the operation waste of the building during occupation and how it will be segregated and diverted from the landfilled. A sufficient and compliant bin area and appropriately sized bins have been provided to help maximise recycling and the reuse of municipal waste in accordance with the local and GLA requirements.
- 7.339 Officers consider the above key commitments identified within the submitted Circular Economy Statement to be acceptable and in accordance with Policy SI7 of the London Plan. *Summary and Securing the Proposals*
- 7.340 It is considered that the proposals are in accordance with adopted policies for sustainability and CO2 emission reductions and it is recommended they are secured through appropriate conditions to ensure:
- PV energy generation maximised.
 - The carbon savings are delivered as identified in the Energy Assessment
 - Post completion report (including As Build calculations) is submitted to demonstrate energy / CO2 savings have been delivered.
 - Future district heating connection safeguarded
- 7.341 A carbon off-setting contribution of £527,250 would be required to deliver a policy compliant net zero carbon development and this would be secured via the S106 agreement.

Flood Risk & Drainage

- 7.342 Policy SI12 of the London Plan seeks to manage the current and expected flood risk from all sources and requires development to minimise and mitigate the flood risk and address the residual risk, to contribute to the delivery of the measures set out in the Thames Estuary 2100 Plan, and to protect the integrity of flood defences and allow access for future maintenance and upgrading.
- 7.343 Policy SI13 of the London Plan requires development to manage surface water run-off through the relevant drainage hierarchy.
- 7.344 Tower Hamlets Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drain is protected to a very high standards by the Thames tidal flood defences up to a 1 in 1000 (0.1%) change in any given year.
- 7.345 The Application Site is in Flood Risk Zone 3a and is protected by the Thames Tidal flood defences up to a 1 in 1000 (0.1%). EA's comments confirmed that the Site is at a low risk of tidal and fluvial flooding.
- 7.346 It has been confirmed that the finished flood level would be above the design event including climate change allowance. All residential units would be above the breach levels. The ES concluded that the overall impact from the Proposed Development would be minor beneficial, which is considered to be significant, through reducing overall flood risk in the area.
- 7.347 The drainage strategy would include attenuation-based suds features such as blue roofs and rainwater harvesting. All surface water runoff would be discharged into the Millwall Inner Dock via a new headwall, which is acceptable. An informative will be placed for an approval requirement from the Canal and River Trust, and suds details would be secured via condition with further design detail to be provided at a later stage.
- 7.348 Within the GLA stage 1, they commented that the drainage plan should state the proposed discharge rate into the dock and provide the dimensions and volumes of proposed attenuation features. They also requested that further commitment to the inclusion of rainwater harvesting should be provided at this stage, including further detail on the type and location of rainwater harvesting. However, officers are satisfied that this can be dealt as part of the detailed SuDS measures and Drainage Management Strategy condition.
- 7.349 The GLA requested that consultation from CRT agreeing to the principle of discharge should be provided. The CRT have confirmed that there could be potential for surface water discharge to the Millwall Inner Dock subject to Trust engineering approvals and a commercial agreement, which they noted has been identified within the Flood Risk Assessment and Drainage Strategy.

Health Impact Assessment

- 7.350 London Plan GG3 requires developments to assess their potential impacts on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments (HIAs). Tower Hamlets Local Plan D.SG3 requires major developments referable to the GLA to provide an HIA.
- 7.351 The application is supported by a Health Impact Assessment report which assessed the proposed development against the key wider determinants of health to identify potential health impacts.
- 7.352 The report concludes that there would be several positive health impacts, including the provision of affordable homes, various commercial and community uses generating employment and catering for the wider area, provision of new and improved public realm and greenery, as well as improved pedestrian and cycling connection along the dockside promoting active travel.

7.353 The majority of these would be embedded in the proposed development and would be secured via planning conditions and obligations.

Land Contamination

7.354 The assessment of potential impacts on the ground conditions and contamination has been provided as part of Chapter 13 of the ES.

7.355 The Council's contaminated land officer raised no issues with the submitted details and recommended the inclusion of a pre-commencement condition to provide further details. This would ensure that the application accords with Tower Hamlets Local Plan policy D.ES8.

Waste

7.356 Policy D.MW3 of the Local Plan (2020) requires adequate refuse and recycling storage alongside and combined with appropriate management and collection arrangements. The policy requires new major residential development to incorporate high quality on-site waste collection system that do not include traditional methods of storage and collection.

7.357 The supporting text of the policy further explains that the Council is seeking to move away from the traditional waste storage methods, including Euro bin containers. The policy also states that supporting evidence must be submitted with the application to demonstrate where non-traditional waste methods are not practicable.

7.358 The Council's Reuse, Recycle and Waste SPD sets out design guidelines regarding waste management for new residential developments and provides a decision tree to ensure that the correct waste storage and collection methods are chosen for developments.

7.359 The High Density SPD also provides a set of guidelines for high density scheme. In relation to waste, design guidelines AB.14 states that traditional waste systems will be resisted.

7.360 In terms of the residential units, within the kitchen of each property, separation will be provided for practically through the provision of three separate containers, one for each of the material streams (dry recyclates, organic matter and residual waste). There will also be one chute per core for residents to dispose of this waste.

7.361 A separate, communal, space is provided for larger items, to which each resident will have fob-controlled (secure) access.

7.362 The Childs Play Space at Level 02 will have access to this element of the waste management system at The Site, via chute access.

7.363 With regards to the commercial units, the tenants will provide a suitable internal waste storage area within their tenanted areas that encourages their employees to segregate waste. The materials that are segregated and the method of storage (i.e. co-mingled or source segregated) within the tenanted areas will need to reflect the types of waste generated and should include food waste if generated in sufficient quantities.

7.364 A dedicated Commercial Refuse Store for non-residential waste is to be provided at Ground Level, underpinned as per the management sized to enable the safe, secure, management of all material streams. As per the management of residential waste, site FM team will be responsible for the movement of full / empty containers (or larger items / containers) from the dedicated waste room / refuse store to the temporary holding location within the service area. Third party service providers will then assume responsibility for moving the containers to the vehicle located at the eastern façade, via a dedicated access point, for them to be emptied, and returned, as appropriate.

7.365 During the assessment of the applicant, the Council's waste officers have raised concerns regarding the proposed ratio of the in bin compaction proposed for the residential waste. The applicant has confirmed they will adhere to the 2:1 in bin compaction ratio and this will be secured through the operational waste management plan which will be conditioned should planning permission be granted.

7.366 Collections would take place within the private road that serves the building and the vehicles would enter and exit the site in forward gear. It is considered that the arrangements would be safe and ensure safety to the public highway is maintained. Both residential and commercial waste would be collected within the Site and would not rely on the public highway.

Wind/Microclimate

7.367 The relevant information in Chapter 11 of the ES provides details on the wind microclimate assessment. The Applicant has carried out a wind tunnel testing through five scenarios to determine the expected suitability of wind conditions based on the City Lawson criteria for pedestrian comfort and safety, both for on-site and off-site receptors. The Applicant has confirmed that all mitigation measures have been tested in the wind tunnel to ensure that these would be adequate as presented within the results.

7.368 The information presented in the ES and its supporting documentation confirms that the proposed mitigation measures would ensure that all of the spaces within the proposed development would be suitable for their intended use, including spaces containing communal amenity and child play spaces, private amenity spaces of the proposed development.

7.369 The Applicant has considered the wind microclimate effects on the spaces surrounding the proposed development such as DLR station, bus stops and thoroughfares, as well as private, communal and other amenity spaces of the adjacent schemes. This also includes the consideration to cumulative schemes that have not been built out. Overall, there would be a negligible impact on all assessed receptors.

7.370 The mitigation measures would be included within the scheme through the proposed soft landscaping, inclusion of screens on Levels 24, 41 and 48 and placing the pergola structure closer to the building façade on these levels. These details would be secured via condition.

Infrastructure Impact

7.371 Policy D1 (Part A) of the Isle of Dogs Neighbourhood Plan requires that in order to support sustainable development and in view of the strain on infrastructure in the area and the shortage of publicly owned land, applicants for residential developments exceeding 1,100 habitable rooms per hectare in locations with a PTAL of 5 or less are required to complete and submit an Infrastructure Impact Assessment as part of the planning application.

7.372 The supporting text to Policy D1 highlights that the Neighbourhood Plan seeks to identify those developments that are most likely to impact on the infrastructure needs of the Neighbourhood Plan Area and the wellbeing of its residents, with the aim that both the existing infrastructure provision and the likely impact of the development in question are taken into account when such applications are determined.

7.373 In terms of Transport matters the ES includes a detailed assessment of public transport capacity which has concluded that the development would have an acceptable impact on public transport capacity.

7.374 In terms of both surface water and foul water drainage Thames Water have confirmed that there is sufficient capacity within the system accommodate the development. With regards water supply Thames Water have requested a planning condition be imposed which prevents occupation of the development until confirmation has been provided that either: (a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or (b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. This will ensure there is sufficient water supply to serve the proposed development. This condition has been included within the recommended conditions.

- 7.375 In relation to health and education facilities, the development would include a significant CIL payment to commit to improved services. Furthermore there are a number of schools coming forward on nearby developments to accommodate new residents.
- 7.376 With regards public transport and highway infrastructure this is addressed in the ES documents and it is considered that there would be no unacceptable impact on transport infrastructure.
- 7.377 The development would deliver additional open space in and around the site, including the Underline which is welcome and would contribute towards local infrastructure.
- 7.378 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £9,383,223.02 (inclusive of social housing relief and exclusive of indexation) and Mayor of London CIL of approximately £2,288,481.15 (inclusive of social housing relief and exclusive of indexation).
- 7.379 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.
- 7.380 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:
- £221,160 towards construction phase employment skills training
 - £23,057.86 towards end-user phase employment skills training
 - £527,250 towards Carbon Offsetting Contribution
 - £25,000 towards Legible London wayfinding (TfL)
 - £46,571 towards Development Co-ordination and Integration
 - Monitoring fee for financial contribution of 5% of the first £100,000 of contribution, 3% of the part of the contribution between £100,000 - £1 million, 1% of the part of the contribution over £1 million – 1%. Monitoring fee for non-financial contributions of £1,000 per 100 units or 10,000 sqm - £1,000
- 7.381 Overall the development subject to securing the relevant conditions and planning obligation the development is considered by officers to have an acceptable impact on local Infrastructure and meets the requirements of the IOD Neighbourhood Plan.

Local Finance Considerations

- 7.382 Assuming that the Council delivers its annual housing target of 3,931 units, the Council would be liable for a New Homes Bonus. Due to the introduction of a new threshold approach by the Government it is not possible to provide an exact amount of New Homes Bonus the proposed development would deliver.

Human Rights & Equalities

- 7.383 The proposal does not raise any unique human rights or equalities implications. The balance between individual rights and the wider public interest has been carefully considered and officers consider it to be acceptable.
- 7.384 The proposed residential accommodation would meet inclusive design standards and 60 of the new homes would be wheelchair accessible, 18 within the affordable rented tenure, 6 within the intermediate sector and 36 within the private tenure. These standards would benefit future residents, including disabled people, elderly people and parents/ carers with children.
- 7.385 The provision of affordable housing would be of particular benefit to groups that area socially/ economically disadvantaged.
- 7.386 The application has undergone the appropriate level of consultation with the public and Council's consultees. The applicant has also carried out engagement with the residents and businesses in the area prior to the submission of the planning application.

7.387 To conclude, the proposed development would not result in adverse impacts upon equality or social cohesion.

8. RECOMMENDATION

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

8.2 Financial obligations

- a) £221,160 towards construction phase employment skills training
- b) £23,057.86 towards end-user phase employment skills training
- c) £527,250 towards Carbon Offsetting Contribution
- d) £25,000 towards Legible London wayfinding (TfL)
- e) £46,571 towards Development Co-ordination and Integration
- f) Monitoring fee for financial contribution of 5% of the first £100,000 of contribution, 3% of the part of the contribution between £100,000 - £1 million, 1% of the part of the contribution over £1 million – 1%. Monitoring fee for non-financial contributions of £1,000 per 100 units or 10,000 sqm - £1,000

Total financial contributions: £843,036 (excluding monitoring fee).

8.3 Non-financial obligations:

- a. Affordable housing provided (35% by habitable room) 450 homes (1,142 habitable rooms) to comprise:
 - 83 units at THLR & LAR
 - 37 units as Shared Ownership
 - Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to Building Regulations M4 (3)(2)(b) standard)
- Early-stage review (GLA)
- b. Access to employment:
 - 20% local procurement
 - 20% local labour in construction
 - 38 construction phase apprenticeships
- c. Transport
 - Approval and implementation of Travel Plan (TfL)
 - Implementation and funding of highway works (as covered in s278)
 - Car and permit free development
- d. Compliance with Considerate Constructors Scheme
- e. Architect retention
- f. Management and maintenance plan for public space
 - a. Public access and management plan for the public realm on site
 - b. Underline
- g. Amenity Space management plan (affordable and private)
- h. Post construction monitoring of whole lifecycle carbon cycle
- i. Delivery of the community space (including details on the final use and management of the space)
- j. Operational Management Plan (waste)

- 8.4 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within three months of the resolution the legal agreement has not been completed, the Corporate Director for Place is delegated power to refuse planning permission.
- 8.5 That the Corporate Director of Place is delegated the power to impose conditions and informatives to address the following matters:

8.6 Planning Conditions

Compliance

1. 3 years deadline for commencement of development.
2. Development in accordance with approved plans.
3. S61 Restriction on demolition and construction activities
4. Air Quality – Generator compliant
5. Noise from plant
6. Fire Statement
7. Noise and Vibration
8. Environmental Statement mitigation measures

Pre-commencement

9. Secure by Design
10. Dust management Plan and PM10 Monitoring
11. Construction Plant and Machinery (NRMM)
12. CEMP
13. Waterborne transport feasibility
14. Contamination
15. Archaeological Investigation
16. Cranes
17. Piling Method Statement
18. DLR details for each phase - impact on DLR's structure/ operation
19. Construction Logistics and Servicing Plan
20. Submission of Site Waste Management Plan
21. Noise - Additional screening level 2 and ground floor units exceeding 55 db
22. Updated Noise Assessment (to include recent planning approvals for the data centre at 8-9 Harbour Exchange)
23. Detailed SuDS measures and Drainage Management Strategy

Pre-ground works

24. Biodiversity enhancement and mitigation
25. Details and submission of samples of external facing materials and architectural detailing.
26. Lighting Strategy
27. Approval of landscaping details
28. Solar Glare assessment
29. Secure by Design
30. Wheelchair units details
31. Flood Warning and Evacuation Plan
32. Density Management Plan

Pre-occupation

33. Kitchen Extract Standards for Commercial Uses
34. Water network upgrades
35. Whole life-cycle carbon post-construction assessment
36. Circular Economy post-construction assessment
37. Car Parking Management Plan
38. Deliveries and Servicing management Plan

39. Noise Insulation Verification Report for New Residential Units

8.7 Informatives

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Canal and River Trust – Oversailing must be agreed prior to commencement
4. Applicant to refer to Canal and River Trust Code of Practice
5. Any surface water discharge requires prior consent from Canal and River Trust
6. Applicant encouraged to contact Canal and River Trust to discuss using dock water for heating and cooling
7. Thames Water – Groundwater Risk Management Permit
8. Thames Water – Public sewer
9. Thames Water – proximity to assets.
10. Thames Water – Pipes
11. Air Quality – PM10 monitoring
12. Air Emission – Flue
13. CoCP
14. GLAAS – WSI must be prepared by suitably qualified professionally accredited archaeological practice

APPENDIX 1

LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

Documents:

- Cover Letter, prepared by DP9, dated 6th April 2022;
- Planning Statement, prepared by DP9, dated April 2022;
- Affordable Housing Statement, prepared by DP9, dated April 2022;
- Design & Access Statement ('DAS'), prepared by Make Architects dated March 2024;
- Landscape Strategy, prepared by Spacehub, dated 8th April 2022;
- Urban Greening Factor Assessment, prepared by Spacehub dated 20th March 2024;
- Preliminary Ecological Appraisal (PEA) and Biodiversity Survey Report, prepared by Schofield Lothian, ref TRI028, dated 10 August 2021;
- Infrastructure Impact Assessment, prepared by Meinhardt, dated April 2022;
- Land Contamination Statement (Preliminary Risk Assessment (PRA)), prepared by WSP;
- Environmental Statement ('ES') including all technical appendices, prepared by Trium;
- ES Formal Review Report Response, prepared by Trium, dated December 2023;
- Transport Assessment ('TA'), prepared by Meinhardt, Rev P02, dated 8th April 2022;
- Framework Travel Plan, prepared by Meinhardt;
- Delivery and Servicing Plan, prepared by Meinhardt;
- Draft Construction Environmental Management Plan -CEMP, prepared by Blue Sky, dated March 2022;
- Energy Assessment and Sustainability Report, prepared by Meinhardt, Rev 03, dated 8th April 2022;
- Response to GLA Energy Memo Stage 1 Consultation, prepared by Meinhardt, dated 16th August 2022 and 22nd April 2024;
- Sustainability Statement, prepared by Meinhardt;
- Whole Life Carbon Assessment, prepared by Meinhardt;
- Circular Economy Statement, prepared by Meinhardt;
- Waste Management Strategy (Operational), prepared by Meinhardt, dated April 2022;
- Fire Statement, prepared by Hoare Lea, rev 00, dated 7th April 2022;
- Draft Fire Statement Form;
- Fire Safety Addendum, prepared by Hoare Lee, dated October 2022;
- Foul Sewage and Utilities Statement, prepared by WSP;
- Flood Risk Assessment, prepared by WSP, dated April 2022;
- Statement of Community Involvement, prepared by Four Communications, dated December 2021;
- Sustainable Urban Drainage Strategy, prepared by WSP;
- Aviation Safeguarding Report, prepared by Kate Grant, dated April 2022;
- Health Impact Assessment (HIA), prepared by Quod, dated April 2022;
- Marketing Evidence Report, prepared by Savills, dated April 2022;
- Internal DSO Report, prepared by GIA, dated April 2022;
- Final Review Report - Daylight, Sunlight, Overshadowing and Solar Glare, prepared by GIA, dated 24 October 1994.
- Reuse, Recycling and Waste Plan, prepared by Castle 15, dated 4 March 2022;
- Applicants response to waste comments, prepared by Castle Fifteen Consulting Ltd, dated 12th August 2022;

Drawings:

Existing

1883-MAK-PA0900 Rev 00 – Existing Site Plan

1883-MAK-PA0999 Rev 00 – Existing Basement Level -1

1883-MAK-PA1000 Rev 00 – Existing Ground Floor Plan

1883-MAK-PA1001 Rev 00 – Existing First Floor Plan
1883-MAK-PA1001 Rev 00 – Existing First Floor Plan
1883-MAK-PA1002 Rev 00 – Existing Second Floor Plan
1883-MAK-PA1003 Rev 00 – Existing Third Floor Plan
1883-MAK-PA1004 Rev 00 – Existing Fourth Floor Plan
1883-MAK-PA1005 Rev 00 – Existing Fifth Floor Plan
1883-MAK-PA1006 Rev 00 – Existing Sixth Floor Plan
1883-MAK-PA1007 Rev 00 – Existing Roof Plan
1883-MAK-PA1200 Rev 00 – Existing Context Elevations
1883-MAK-PA1201 Rev 00 – Existing Context Elevations
1883-MAK-PA1202 Rev 00 – Existing North Elevation
1883-MAK-PA1203 Rev 00 – Existing East Elevation
1883-MAK-PA1204 Rev 00 – Existing South Elevation
1883-MAK-PA1205 Rev 00 – Existing West Elevation

Proposed

1883-MAK-PA0200 Rev 00 - Proposed Site Plan
1883-MAK-PA1599 Rev 00 – Proposed Demolition Basement Level -1
1883-MAK-PA1600 Rev 00 – Proposed Demolition Ground Floor Plan
1883-MAK-PA1601 Rev 00 – Proposed Demolition First Floor Plan
1883-MAK-PA1602 Rev 00 – Proposed Demolition Second Floor Plan
1883-MAK-PA1603 Rev 00 – Proposed Demolition Third Floor Plan
1883-MAK-PA1604 Rev 00 – Proposed Demolition Fourth Floor Plan
1883-MAK-PA1605 Rev 00 – Proposed Demolition Fifth Floor Plan
1883-MAK-PA1606 Rev 00 – Proposed Demolition Sixth Floor Plan
1883-MAK-PA1607 Rev 00 – Proposed Demolition Roof Plan
1883-MAK-PA1700 Rev 00 – Proposed Demolition North Elevation
1883-MAK-PA1701 Rev 00 – Proposed Demolition East Elevation
1883-MAK-PA1702 Rev 00 – Proposed Demolition South Elevation
1883-MAK-PA1703 Rev 00 – Proposed Demolition West Elevation
1883-MAK-PA1998 Rev 00 – Proposed Level B2 Plan
1883-MAK-PA1999 Rev 00 - Proposed Level B1 Plan
1883-MAK-PA2000 Rev 00 - Proposed Level 00 Plan
1883-MAK-PA2001 Rev 00 - Proposed Level 01 Plan
1883-MAK-PA2002 Rev 00 - Proposed Level 02 Plan
1883-MAK-PA2003 Rev 01 - Proposed Level 03-07 Plan
1883-MAK-PA2008 Rev 01 - Proposed Level 08-10 Plan
1883-MAK-PA2011 Rev 01 - Proposed Level 11-15 Plan
1883-MAK-PA2016 Rev 01 - Proposed Level 16-18 Plan
1883-MAK-PA2019 Rev 01 - Proposed Level 19-20 Plan
1883-MAK-PA2021 Rev 02 - Proposed Level 21-23 Plan
1883-MAK-PA2024 Rev 01 - Proposed Level 24 Plan
1883-MAK-PA2025 Rev 01 - Proposed Level 25-26 Plan
1883-MAK-PA2027 Rev 01 - Proposed Level 27-39 Plan
1883-MAK-PA2040 Rev 00 - Proposed Level 40 Plan
1883-MAK-PA2041 Rev 01 - Proposed Level 41 Plan
1883-MAK-PA2042 Rev 01 - Proposed Level 42 Plan
1883-MAK-PA2043 Rev 01 - Proposed Level 43-47 Plan
1883-MAK-PA2048 Rev 01 - Proposed Level 48 Plan
1883-MAK-PA2049 Rev 01 - Proposed Level 49 Plan
1883-MAK-PA2050 Rev 00 - Proposed Level 50 Plan
1883-MAK-PA2051 Rev 00 - Proposed Level 51 Plan
1883-MAK-PA2052 Rev 00 - Proposed Level 52 Plan
1883-MAK-PA2200 Rev 00 – Context Elevations
1883-MAK-PA2201 Rev 00 – Context Elevations
1883-MAK-PA2202 Rev 00 – North Elevation
1883-MAK-PA2203 Rev 00 – East Elevation
1883-MAK-PA2204 Rev 00 – South Elevation
1883-MAK-PA2205 Rev 00 – West Elevation
1883-MAK-PA2250 Rev 00 – Proposed Section AA

1883-MAK-PA2251 Rev 00 – Proposed Section BB

Landscaping (proposed)

8365-PL-DL-104 REV 01 – General Arrangement Landscape Masterplan – Levels and Drainage Strategy

8365-PL-DL-101 REV 01 – General Arrangement Landscape Masterplan – Ground Level

8365-PL-DL-102 REV 01 – General Arrangement Landscape Masterplan –Level 01

8365-PL-DL-103 REV 01 - - General Arrangement Landscape Masterplan – Roof Plan

8365-SE-GA-201 REV 01 – Landscape Section Ground Level

8365-SE-GA-202 REV 01 – Landscape Section Upper Levels

Highways

2971-MHT-TR-XX-SK-012 P05 – Vehicle Swept Path Analysis – Phoenix 2 Duo Recycler

2971-MHT-TR-XX-SK-023 P05 – Vehicle Swept Path Analysis – Phoenix 2 Duo Recycler

2971-MHT-TR-XX-SK-024 P05 – Vehicle Swept Path Analysis – Phoenix 2 Duo Recycler

Unit Types

PA2500 Rev 00 – Unit Types 1 Bed

1883-MAK-PA2501 Rev 01 – Unit Types 1 Bed

PA2502 Rev 00 – Unit Types 1 Bed

PA2503 Rev 00 – Unit Types 2 Bed

1883-MAK-PA2504 Rev 01 – Unit Types 2 Bed

PA2505 Rev 00 – Unit Types 3 Bed

1883-MAK-PA2506 Rev 01 – Unit Types 3 Bed

PA2507 Rev 00 – Unit Types 3 Bed

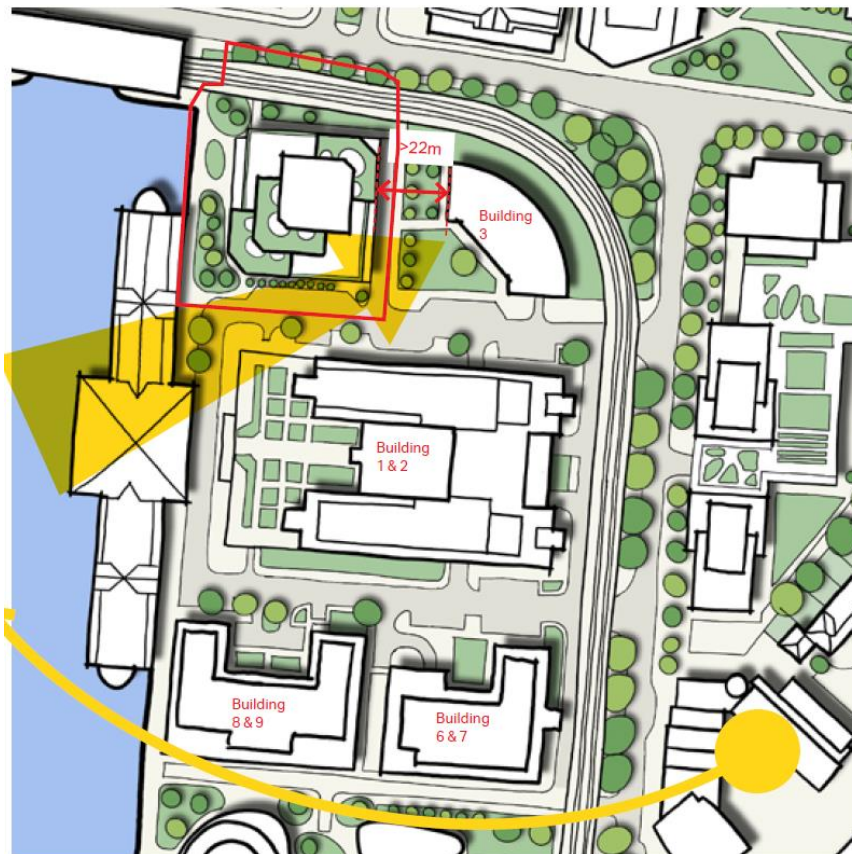
PA2508 Rev 00 – Unit Types 3 Bed

1883-MAK-PA2509 Rev 00 – Unit Types 4 Bed

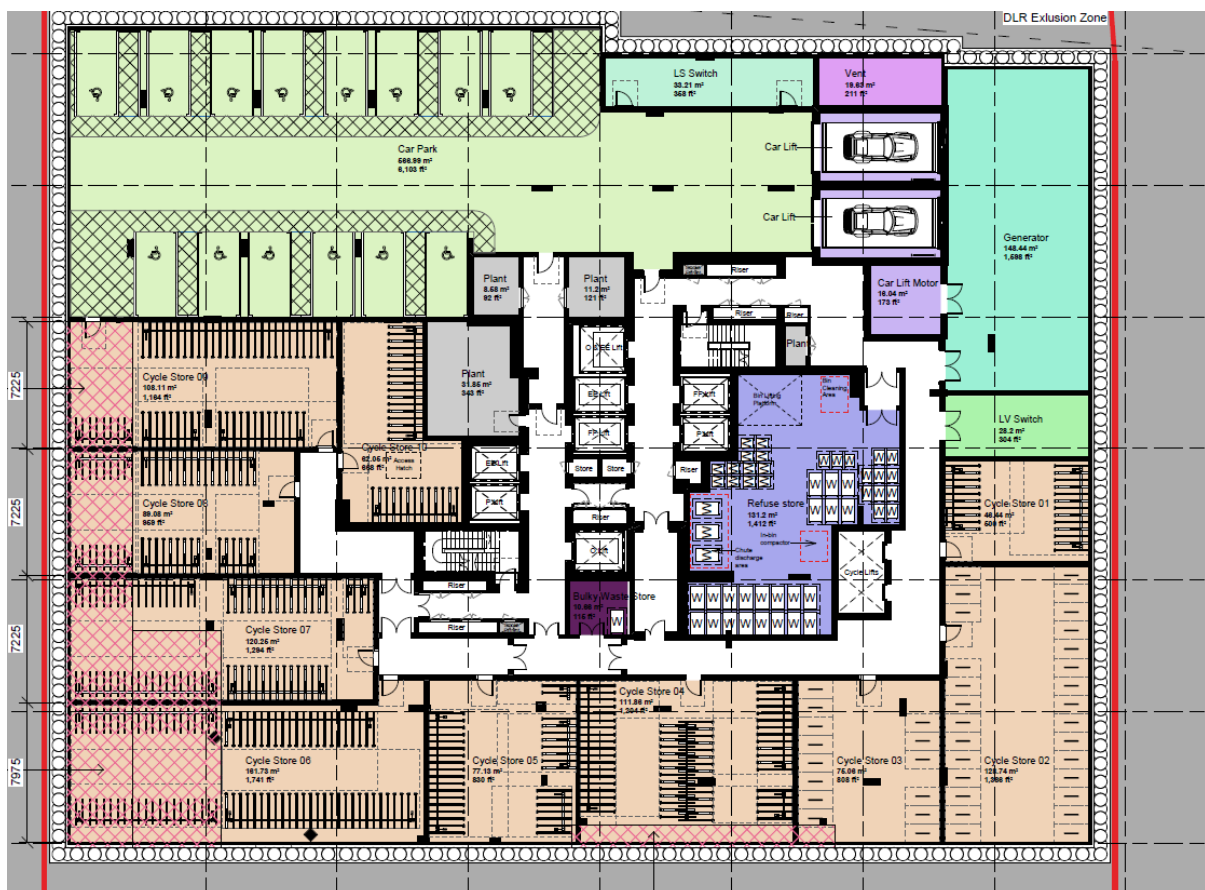
1883-MAK-PA2510 Rev 00 – Unit Types 2 Bed

APPENDIX 2

SELECTION OF APPLICATION PLANS AND IMAGES



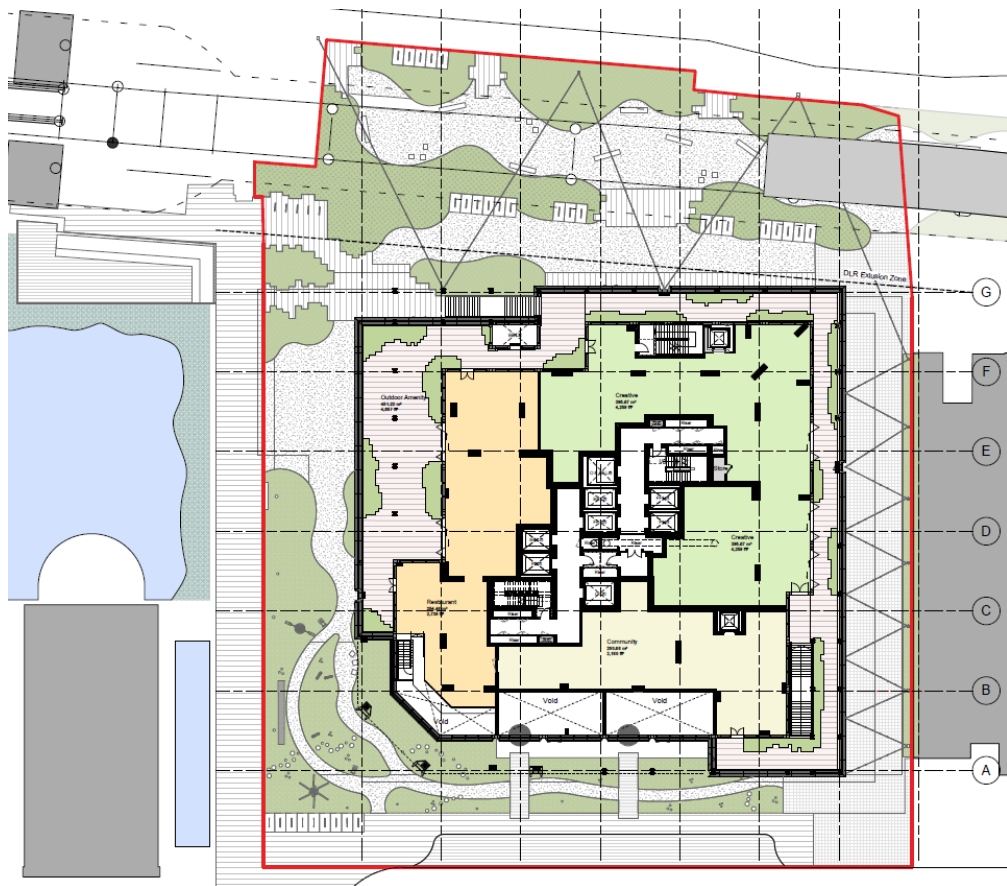
Harbour Exchange buildings



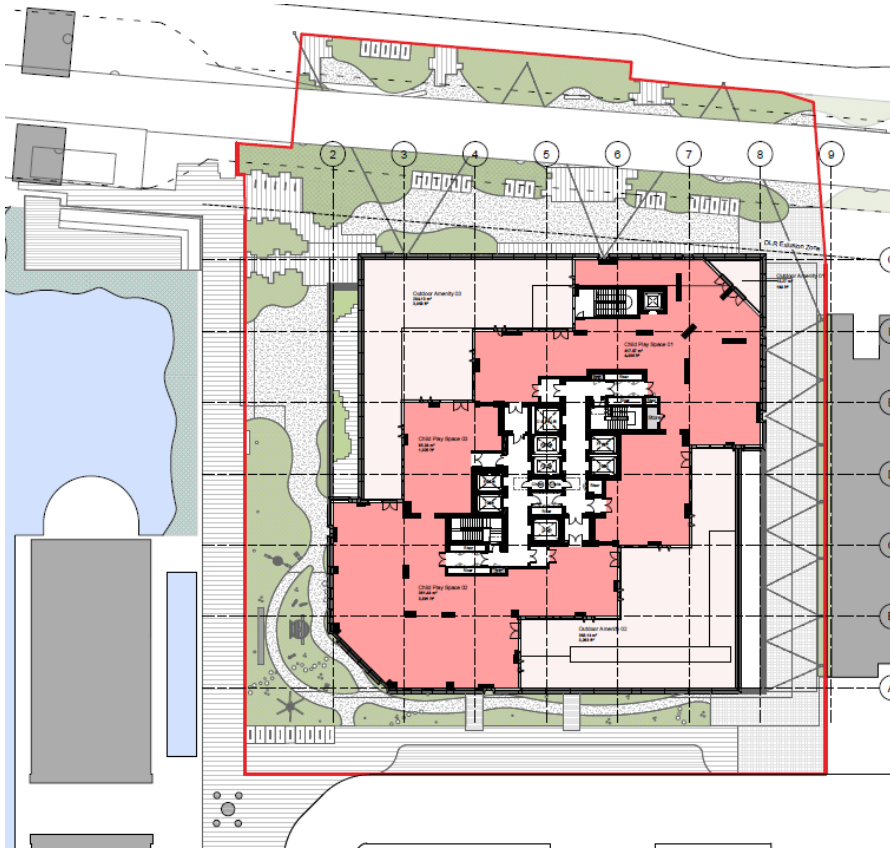
Proposed basement plan



Proposed ground Floor plan



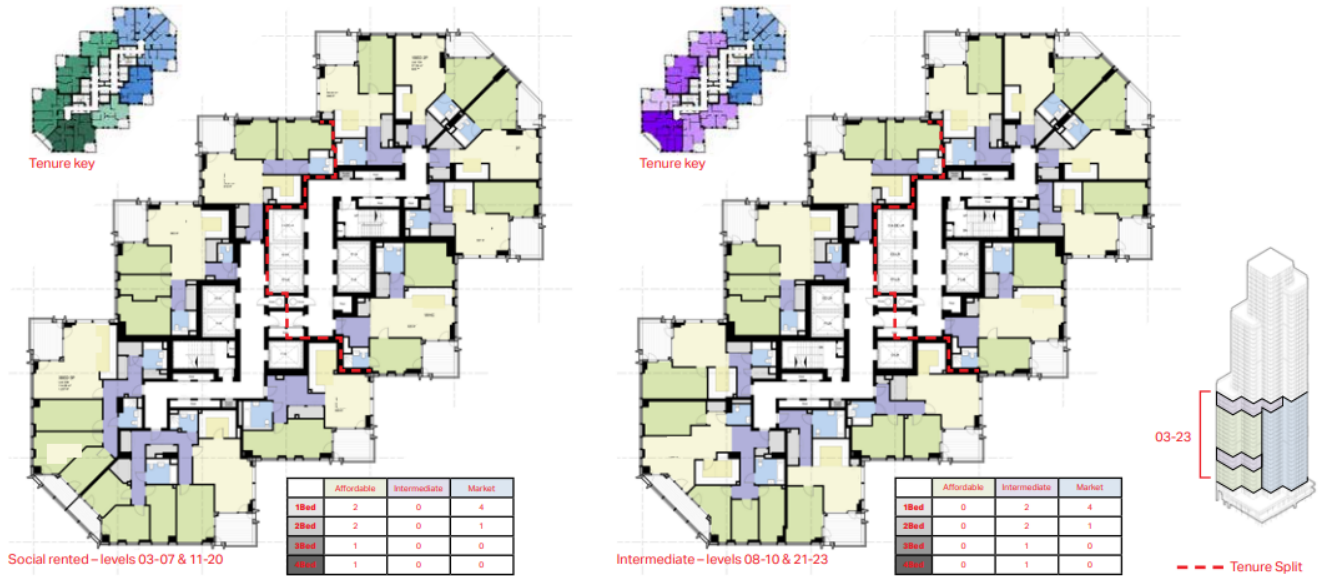
Proposed first floor plan



Proposed second floor plan

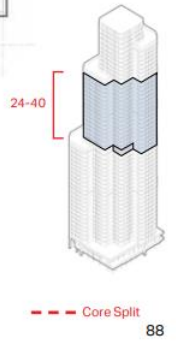
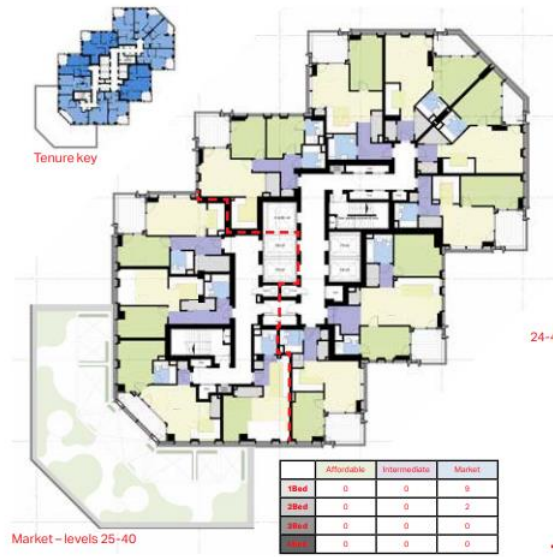
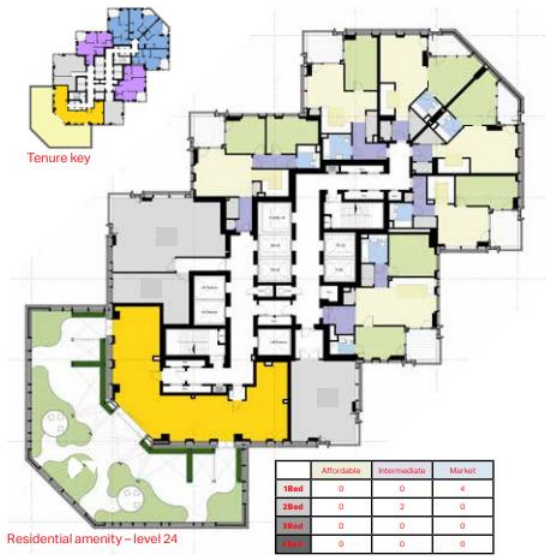
Proposed plans Levels 03-23

Small variations occur at some levels.
These plans are for information only,
please refer to the application drawings.



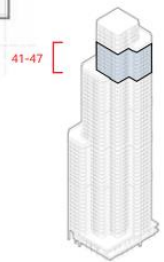
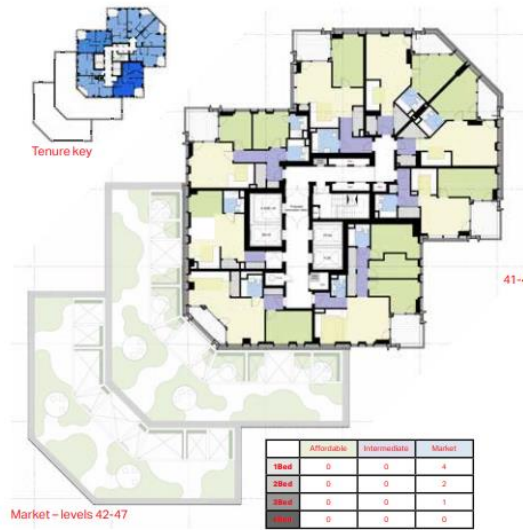
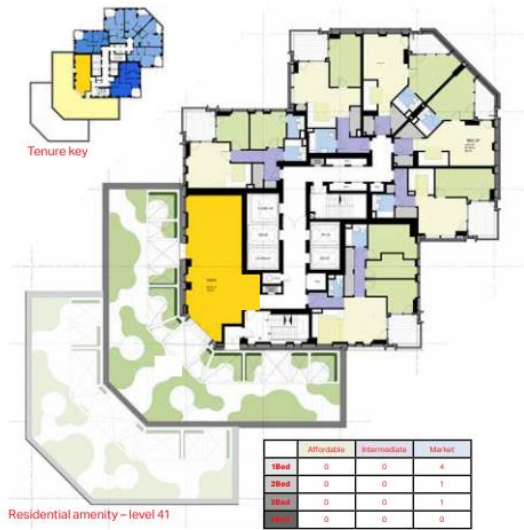
Proposed 3rd – 23rd floor plan

Proposed plans
Levels 24-40



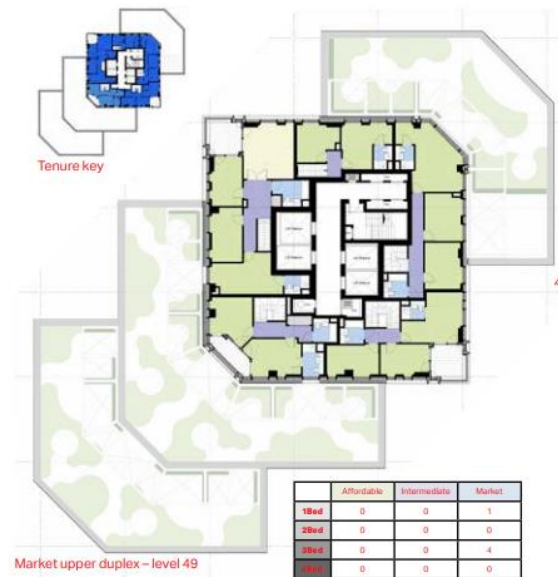
Proposed 24th-40th floor plan

Proposed plans
Levels 41-47



Proposed 41st – 47th floor plan

Proposed plans Levels 48 and 49



	Affordable	Intermediate	Market
1Bed	0	0	1
2Bed	0	0	0
3Bed	0	0	4
4Bed	0	0	0

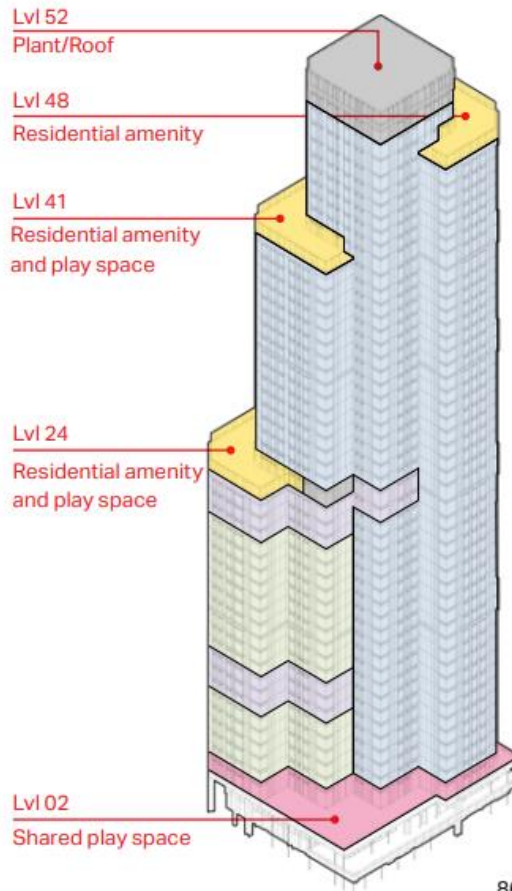


Proposed 48th -49th floor plan

Market				
	Units	Hab. Rooms	% (by units)	POLICY
1 Bed	249	485	75.5%	30%
2 Bed	67	201	20.3%	50%
3 Bed	14	56	4.2%	20%
4 Bed	0	0	0.0%	
TOTAL	330	742	100%	100%

Intermediate 30.8% (by hab room)				
	Units	Hab. Rooms	% (by units)	POLICY
1 Bed	6	12	16.2%	15%
2 Bed	16	48	43.2%	40%
3 Bed	12	48	40.6%	45%
4 Bed	3	15		
TOTAL	37	123	100%	100%

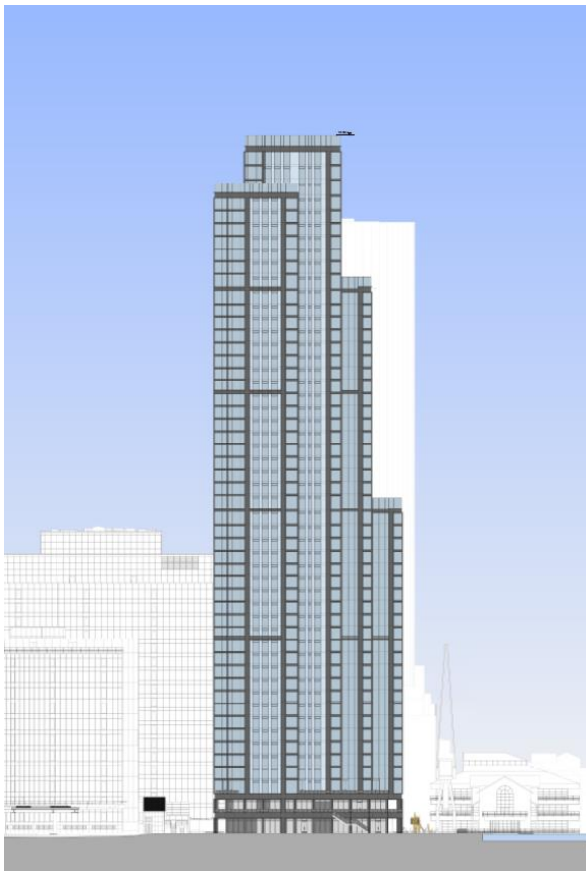
Affordable Rented 69.3% (by hab room)				
	Units	Hab. Rooms	% (by units)	POLICY
1 Bed	21	42	25.3%	25%
2 Bed	25	75	30.1%	30%
3 Bed	25	100	30.1%	30%
4 Bed	12	60	14.5%	75%
TOTAL	83	277	100%	100%



Internal arrangement



Eastern Elevation



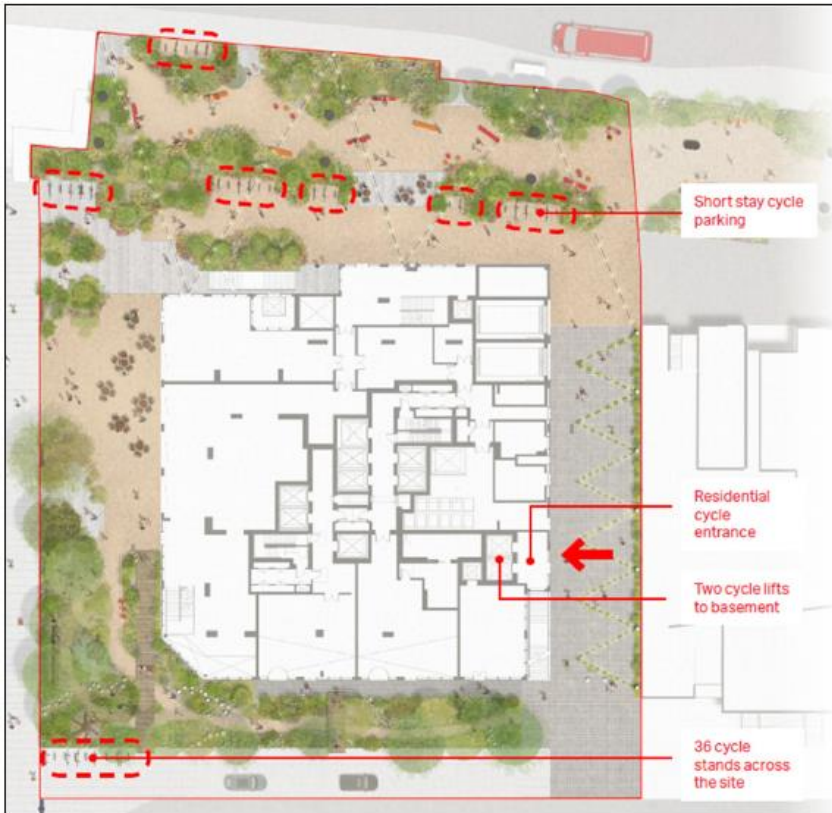
Northern Elevation



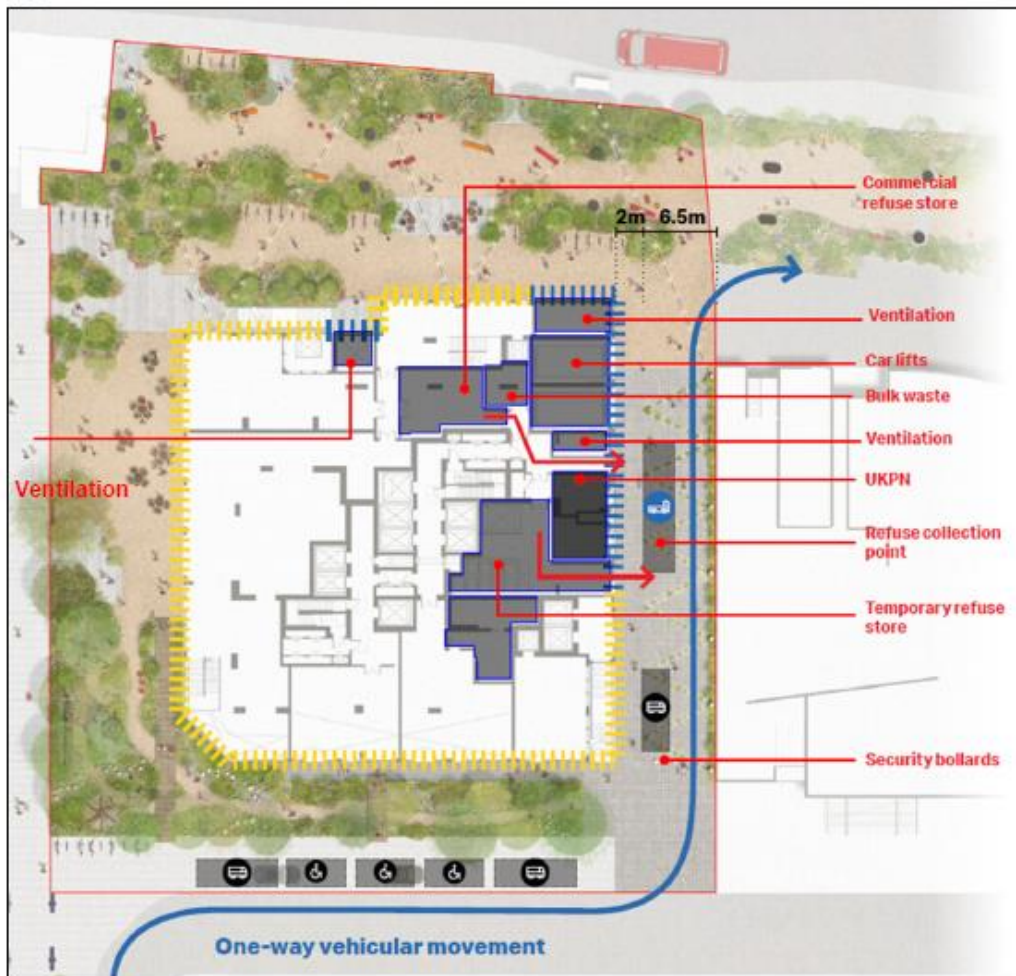
Southern Elevation



Western Elevation



Short stay cycle parking locations



Refuse collection points



Proposed view from the south of the site



View looking across the dock (north east)



View looking across South Dock from Canary Wharf



East Street

Podium design
Residential Southern entrances

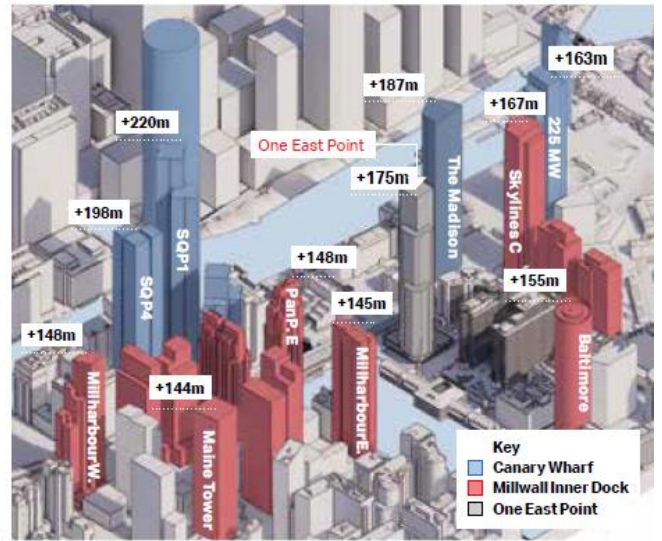
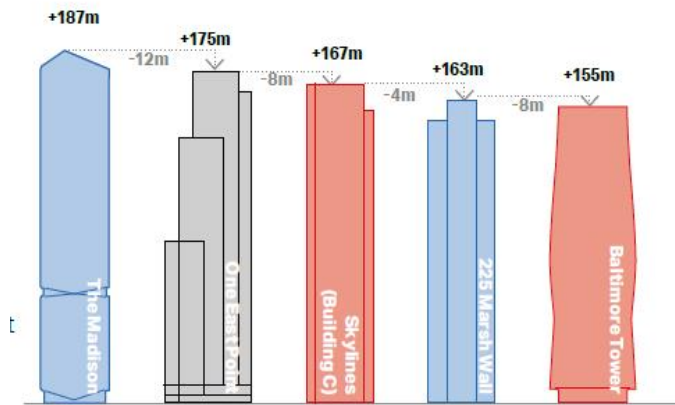


Residential Southern Entrances

Podium design
Waterfront activity



Waterfront activity



Analysis of proposed development (shown in grey) within surrounding context