

**Application for Planning Permission***[click here for case file](#)***Reference** PA/23/02037**Site** Poplar Gas Holder Site (PHASES 2 And 3), Leven Road,
London, E14**Ward** Lansbury**Proposal** A hybrid planning application (part full/part outline) comprising:

1. In Full, Phase 2, for residential and residential ancillary (Class C3) arranged in three blocks (A&B, C&D and E&F), Commercial space (Class E), together with access, car and cycle parking, plant rooms, associated landscaping and new public realm, and private open space.

2. In Outline, Phase 3, with all matters reserved except access for a comprehensive mixed-use development comprising the following uses:

- Residential (Class C3);
- Commercial, Business and Service (Class E);
- Public and private open space including riverside walk;
- Internal public pedestrian, cycle and vehicle circulation routes; and
- Storage, car and cycle parking.

The application is accompanied by an Environmental Statement.

Summary Recommendation Grant planning permission with conditions and planning obligations**Applicant** St William Homes LLP**Architect/agent** JTP Architects/Carney Sweeney**Case Officer** Conor Guilfoyle**Key dates**

- Application registered as valid on 07/11/2023
- First consultation on 04/01/2024
- Second consultation (EIA development) on 24/07/24

EXECUTIVE SUMMARY

The application site sits within the former Poplar Gasworks site which is allocated for large scale redevelopment by the Council's Local Plan. The Local Plan site allocation includes provision of housing and employment as well as infrastructure requirements.

This site allocation has a planning permission from 2019 for up to 2,800 homes on the site and other mixed uses throughout four main phases, plus parkland. This proposal seeks to 'drop into' that permission by replacing phases 2 and 3 with an alternative scheme which allows a maximum of 100 additional units compared to it. The units would be designed to a high standard.

The proposed development delivers the requirements of the site allocation policy and is considered to accord with the development plan. In doing so, it would make a significant contribution to the delivery of the Council's housing targets and towards addressing Tower Hamlet's identified housing need. This proposal has a particularly 'strong' offer for family sized (3-bed or larger) homes in the affordable rent tenure, exceeding the level required by planning policy. The standard of accommodation provided in the new homes would be very high with good levels of light, outdoor space, and play facilities.

This proposal would be denser than Phase 2 and 3 in the 2019 scheme by accommodating a maximum of 100 additional units and featuring taller buildings. This approach 'optimises' the potential of such sites as directed by planning policy.

The heights, massing, and site layout responds well to the character and context of the site which is former brownfield industrial land alongside the River Lea with capacity for large-scale redevelopment with few design constraints. The design, layout, and access arrangements of proposal integrate well with the existing planning permission covering the remainder of the former gasworks. No material townscape or heritage harm within the site, or to the surrounding area, would result.

The trade-off of the increased building heights is less bulk and building-coverage at ground level. Consequently, the external amenity spaces, landscaping, and public realm are all well-designed and high-quality, and a demonstrable improvement over the existing permission.

Similarly, the 'slip block' type of building is superior in design-quality than the type used in the 2019 scheme. This building type maximizes the amount of daylight, sunlight, dual-aspect units, and outlook and privacy protection for the homes. Overall, the scheme is very well designed, the homes would be designed to high standard, and the quality of this proposal here is better than the existing permission.

Impacts on neighbouring amenity would be acceptable. Some neighbouring properties would see a reduction in daylight and sunlight and increased shadowing. However, the amount of retained sunlight and daylight, the limited extent of shadowing, and the

limited amount of time which these impacts would take place over, mean the impacts are not materially harmful in the context of an urban area. Any impact would be outweighed by benefits of the proposed development. The new dwellings proposed would provide a high level of compliance with respect to the BRE lighting guidance.

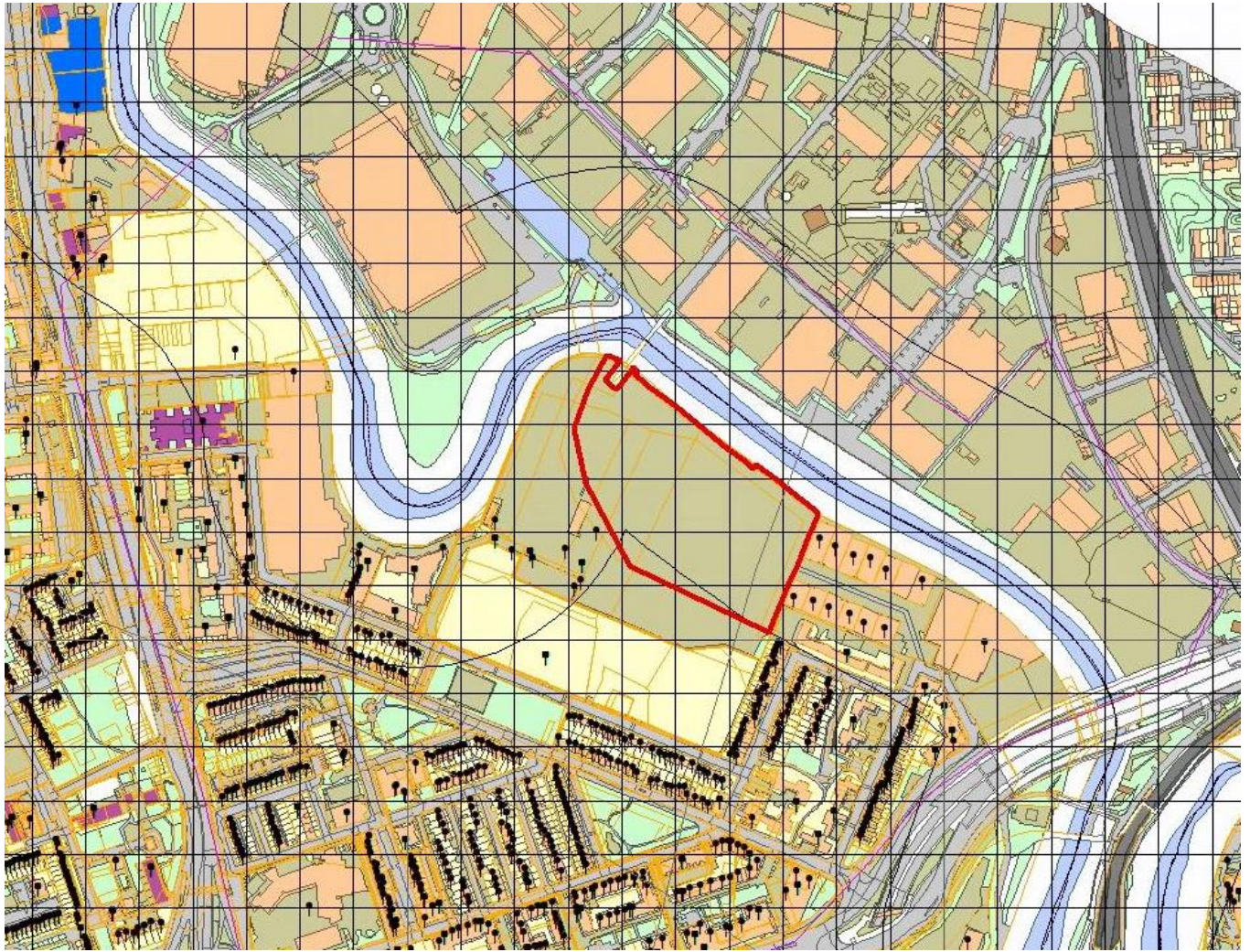
Vehicle and pedestrian/cycle access, accessible car parking arrangements, and servicing on-site are acceptable subject to conditions details secured by legal agreement. The proposal would continue to 'safeguard' two parts of the site to allow for future bridges to connect across the river. Contributions would be sought for TFL towards improvements at Canning Town interchange and to the Council for future connectivity improvements. Conditions would restrict on-street parking whilst the proposal allows for policy-compliant accessible car parking. Sufficient high quality cycle parking would feature. Travel Plans and a car-club membership for eligible occupiers would be secured.

Environmental impacts arising from the proposal would be acceptable subject to details to be secured. The energy strategy would sufficiently reduce carbon dioxide emissions. An additional carbon offsetting payment would be secured through the S106 legal agreement.







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 including those related employment and skills training, carbon offsetting, and contributions towards transport infrastructure and connectivity.

Considered as a whole, the proposed development delivers the requirements of the site allocation policy and is considered to accord with the development plan. Officers are satisfied that the proposed development would deliver a high quality, well integrated, inclusive, sustainable place, which provides a significant contribution to the delivery of the Council's housing targets and identified housing needs.

Officers therefore recommend planning permission is granted.



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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/23/02037**

This site map displays the Planning Application Site Boundary and the extent of the area within which



London Borough
of Ter Hamlets

Scale: 50m grid squares

Date: 15

1. SITE AND SURROUNDINGS

- 1.1 The application Site is 3.4 hectares in size and forms Phases 2 and 3 of a 'wider site'. The 8.3-hectare wider site has part-detailed and part-outline planning permission for up to 2,800 homes, a school, a public park and commercial and business uses over 7 phases, granted in 2019 under planning reference PA/18/02803 (hereafter known as 'the Extant Scheme').
- 1.2 The wider site was previously used for the production and storage of gas, operated by the National Grid, and has since undergone remedial works. The Extant Scheme has been implemented, with Phase 1 nearing completion and Park Phase A having recently commenced. The Site the subject of this application, which comprises Phases 2 and 3, sits within the northern part of the wider site.
- 1.3 To the east of the Site lies the Blackwall Trading Estate, characterised by low scale brick industrial buildings; and a residents' car park which sits at a lower level to the application site. A five-storey flatted development, Oban House, lies to the east of the car park.
- 1.4 To the south and west of the Site lies the remainder of the wider site, comprising from south-east to north-west: Phase 4 (outline permission), Phase 1 (full planning permission), Park Phase A (outline permission with reserved matters approved and works underway) and Park Phase B (outline permission).
- 1.5 The eastern boundary of the wider site abuts the rear gardens of the terraced residential properties on Oban St. To the south of the wider sites lies Leven Road, which is characterised by residential dwelling houses and outdoor play space. To the south-west of the wider site lies Leven Wharf, a residential development of up to twelve storeys in height.
- 1.6 To the north of the wider site lies the River Lea. The river turns a corner around the two main sides of the wider site and forms the boundary with the borough of Newham on the far side.
- 1.7 At high-voltage electrical cable serving Canary Wharf runs underground at the western part of the site. It crosses the River Lea via a cable-link bridge north of the site, landing at the northern corner of the wider site before routing underground. This application site 'wraps around' this landing point as shown on the plans.
- 1.8 The relation between the application Site (red), the wider site (blue), and its surroundings is shown in figure 1 on the following page.

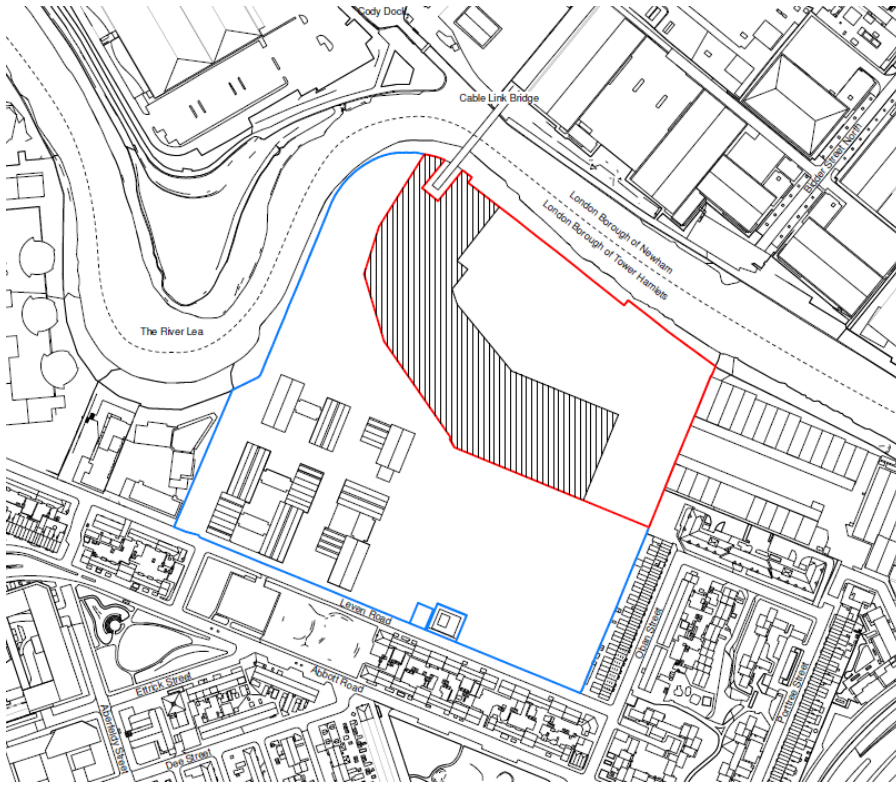


Figure 1: Application site boundary in red

1.9 The Site (Phases 2 and 3) alongside phases of the Extant Scheme is shown below.



Figure 2 (above): Site Phasing plan

- 1.10 The site is not located within a conservation area, nor are there any listed buildings or conservation areas immediately adjacent to the site. There are however several listed buildings located within 500m of the site. These include the Grade II* listed Balfron Tower to the south-west of the site and the Grade II* listed East India Dock House, the Grade II listed East India Dock Wall and the Grade II Listed Entrance Gateway to the Blackwall tunnel to the south of the site. The closest conservation area is the Balfron Tower Conservation Area, which is south-west of the site, on the far side of the A12.
- 1.11 The application site has a low PTAL (Public Transport Accessibility Level) of between 0 and 1b, on a scale of 0-6b where 0 is the least accessible. This level is partially a product of the location of this individual application site as an 'island' within the larger redevelopment site. The PTAL rises to 2 when considered as part of the wider site which fronts Leven Road.
- 1.12 The nearest station is Canning Town which is located approximately 1km to the east. Additionally, East India DLR station is approximately 1.2km to the south-west and Langdon Park DLR station is approximately 1.2km to the west. The nearest bus stops are located on Abbott Road, approximately 100m to the south-east. Note that the measurements are taken from the front (Leven Road) of the wider site. The site is located in Flood Zone 3.
- 1.13 The wider site is an allocated site (3.2 – Leven Road Gas Works) in the Tower Hamlets Local Plan (2020) (the 'Local Plan'). The site allocation sets out the land use requirements for the wider site, which includes housing and employment as well as a minimum of 1 hectare of strategic open space, the provision of a secondary school and the requirement to safeguard land within the site to facilitate the potential delivery of new crossing(s) over the River Lea. Safeguarding this land future-proofs the potential for a) improved access to the major transport interchange at Canning Town, b) the continuity of a green link to Cody Dock, and c) carefully incorporating safeguarded land into the future development and the Leaway.
- 1.14 The site is in the Poplar Riverside Opportunity Area as defined in the London Plan (2021).
- 1.15 The London Plan states that the Opportunity Area has the potential for thousands of new homes and highlighting those improvements to local transport infrastructure, footbridges, and connectivity, in collaboration with the borough of Newham, is crucial for better accessibility and integration within the area.

2. PROPOSAL

- 2.1 This proposal is a 'hybrid' (part-detailed, part-outline) planning application for an alternative version of phases 2 and 3 of the Extant Scheme.
- 2.2 In summary, this proposal provides a mix of residential and commercial uses, landscaping, public realm, and open space.
- 2.3 To enable this, the outer boundary of the proposed phases 2 and 3 remains consistent with the boundary of phases 2 and 3 within the Extant Scheme (internally they are different), and access arrangements/routes are compatible with the adjacent phases/the wider approved scheme.
- 2.4 Full planning permission is sought for Phase 2. Outline planning permission is sought for Phase 3.

2.5 This part-detailed, part-outline scheme is detailed and broken-down into two interacting parts as follows:

1.) The outline component (Phase 3)

2.6 The outline plot measures 1.73 hectares in size. It is located in the north and east parts of the wider site, adjoining the River Lea and the eastern boundary. Figure 2 (Section 1 of this report) shows the location of Phase 3 in the context of the site-wide phasing plan.

2.7 Figure 3 below illustrates the indicative masterplan of the proposals for Phase 3 , alongside the proposals for Phase 2. These details are shown within the context of the wider approved (PA/18/02803) site masterplan.



Figure 3 (above): site masterplan.

2.8 Outline planning permission is sought with all matters reserved, except for access. The outline works comprise a comprehensive mixed-use development comprising the following uses and quantum:

- Residential (Class C3): up to 945 residential dwellings, 212 affordable;
- Commercial, Business and Service (Class E); between 500 and 1000 sqm;
- Public and private open space including riverside walk;
- Internal public pedestrian, cycle and vehicle circulation routes; and
- Storage, car and cycle parking.



Figure 4 (above)

- 2.9 Phase 3 would comprise of 6 buildings, G-L (see fig.4). The buildings would be sited within two development parcels (blocks) with maximum heights as follows:
- Buildings G, H, I (3-part block along the riverfront) part 65, part 83m/85m AOD
 - Buildings J, K, L (3-part eastern end block): part 37m, part 54, rising in the 'marker' building L to part 74, part 80, and part 99m AOD
 - Podium link for all buildings: 15m AOD
- 2.10 Together, the buildings would house up to 945 homes and between 500 and 1000 sqm of commercial (Class E) floor space. The Class E space would be in building 'I' at the ground floor level, adjoining the safeguarded landing area for a future potential bridge (Mayer Parry bridge) and an adjacent public realm/plaza proposed here
- 2.11 A total maximum floorspace of 102,100sqm GEA is proposed with 7002 sqm of open space and 2578 sqm of play space.
- 2.12 All parking would be accessible parking. These parking details are set out within the 'Development Specification'.
- 2.13 This outline component of the scheme is covered by a 'development specification' document and 'parameter plans' submitted with this planning application. The development specification (including a 'design code' document within) provides a written and illustrative account of the parameter plans and establishes the framework within which the subsequent 'Reserved Matters Applications' (RMAs) will be required to comply with.
- 2.14 It also ensures that the proposed development comes forward in a form that aligns with that assessed in the Environmental Statement (ES), and ensures the proposed development as described and as assessed in the ES and within the whole Environmental Impact Assessment (EIA) process is adhered to.
- 2.15 The parameter plans are described in detail within a 'development specification' document. These documents should be read in conjunction with each other.

2.16 Parameter plans essentially set the limits or framework within which detailed proposals must be brought forward. They contain sufficient detail to enable the approval of the range of uses proposed and maximum heights and floorspace figures. The parameter plans are as follows:

Parameter Plan Number	Parameter Plan Title
Parameter Plan 1	Hybrid Planning Application Boundary
Parameter Plan 2	Proposed Outline & Full Planning Application Areas
Parameter Plan 3	Existing Site Levels
Parameter Plan 4	Proposed Development Parcels
Parameter Plan 5	Proposed Site Levels
Parameter Plan 6	Proposed Predominant Ground Floor Uses
Parameter Plan 7	Proposed Access & Movement
Parameter Plan 8	Proposed Basements
Parameter Plan 9	Proposed Maximum Development Block Footprints
Parameter Plan 10	Proposed Maximum Building Heights

2.17 Together, the development specification/design code and parameter plans are known as the 'control documents'.

2.18 If this application is granted, the outline planning permission will be limited to access (only). All matters of appearance, landscaping, layout and scale within this phase are reserved for approval in future RMAs.

2.19 In addition to the parameter plans and design specification document, the Design and Access Statement (DAS) provides contextual information on how the outline proposals are envisioned and designed to tie-in with Phase 2 and the wider development.

2.20 Figure 5 below shows the consented 2019 scheme (coloured) on the left, and this proposal (within red line) on the right.



Figure 5 (above): Approved 2019 scheme (left). Proposed scheme (right).

2 The full detailed component (Phase 2)

2.21 Figure 6 below illustrates the masterplan of Phase 2 in detail (within the red line boundary). The plan also shows the outline plans for Phase 3, and the plans sitting in the context of the wider approved (PA/18/02803) site masterplan. Figure 7 (below) identifies the buildings (A-F) in Phase 2.



Figure 6 (above): Phase 2 (red line) masterplan.

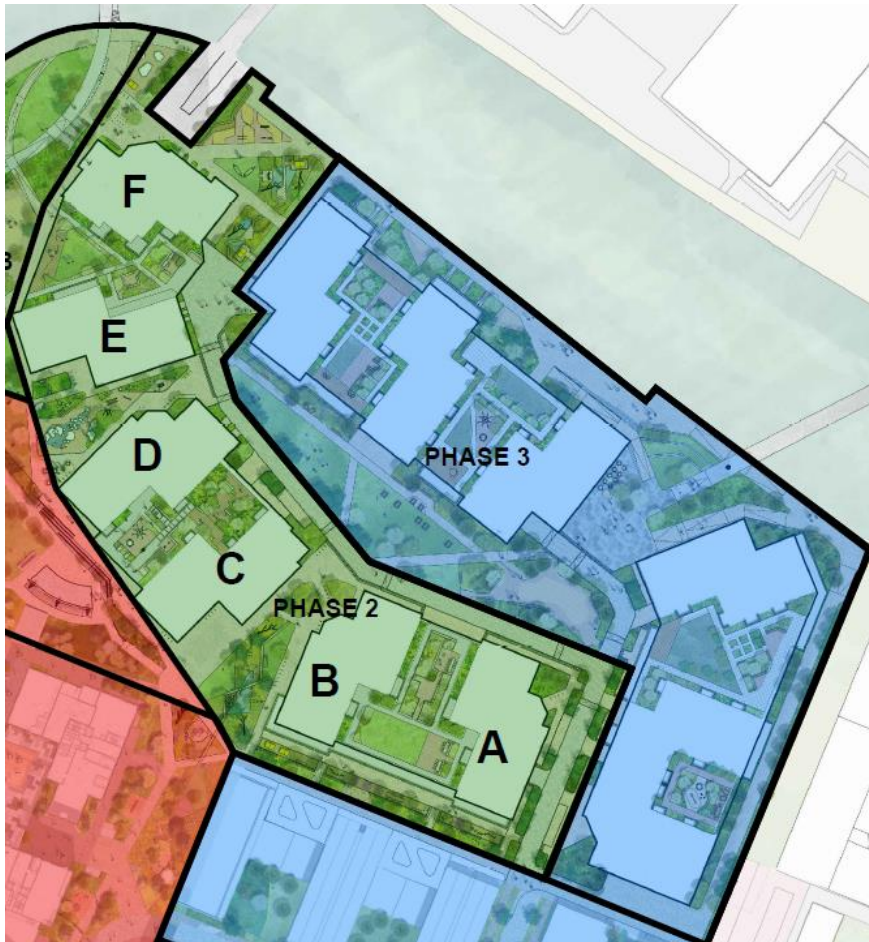


Figure 7(above): Phase 2 buildings A-F.

2.22 Phase 2 is 1.66 hectares in size. It is laid out in a sweeping 'arc' stretching from the cable bridge landing point at the north/north-west of the site, curving towards the far south-east of the site, adjacent to the south part of Phase 3.

2.23 The land use and main quantum of Phase 2 is summarised as follows:

- Residential (Use Class C3): 66,600 sq.m / 989 residential (212 affordable) dwellings.
- Commercial Space (Use Class E): 812 sq.m.
- Access routes and (accessible) car and cycle parking
- Plant rooms
- Landscaping, new public realm, and private open space

2.24 989 residential homes are proposed, equating to 2,715 habitable rooms. 201 (approximately 20%) of the units would be 'family' (3 bed +) homes.

2.25 212 out of 989 residential units within Phase 2 would be affordable housing. A tenure split of 96% affordable rent (50% London Affordable Rent, 50% LBTH Living Rent) and 4% intermediate (shared ownership) is proposed.

2.26 The units and ancillary residential space would be arranged in three blocks which split above a podium into two buildings each (A&B, C&D, & E&F), spread over 10 to 28 floors.

2.27 99 of the units would be wheelchair accessible (M4(3) standard). Of these, 25 would be offered within the affordable rent tenure within Blocks A and B, comprised of 3 x 2B4P dwellings, and 22 x 3B5P dwellings. The remaining 74 M4(3) dwellings would be 2B3P dwellings across Blocks C, D and E in the private tenure. The wheelchair

accessible units would be located within across with a selection of at least two different aspects and orientations offered per dwelling size.

- 2.28 Affordable rented homes would be in Buildings A and B, as would the intermediate homes which would be within ground and first floor duplexes. Private homes are contained within the remaining Buildings C, D, E and F.
- 2.29 812 sqm of commercial space (Class E) is proposed. This would be located in buildings C and D, divided across three ground-floor park-facing units.
- 2.30 The proposed development for Phase 2 comprises a range of heights. The taller buildings would primarily be located towards the north/north-west of the 'arc' layout pattern of Phase 2, closer to the river and Park Phases A & B. Fig.8 below is taken from the Design and Access Statement (DAS) (page 111). It illustrates the distribution of height across Phase 2, with the buildings in blue.

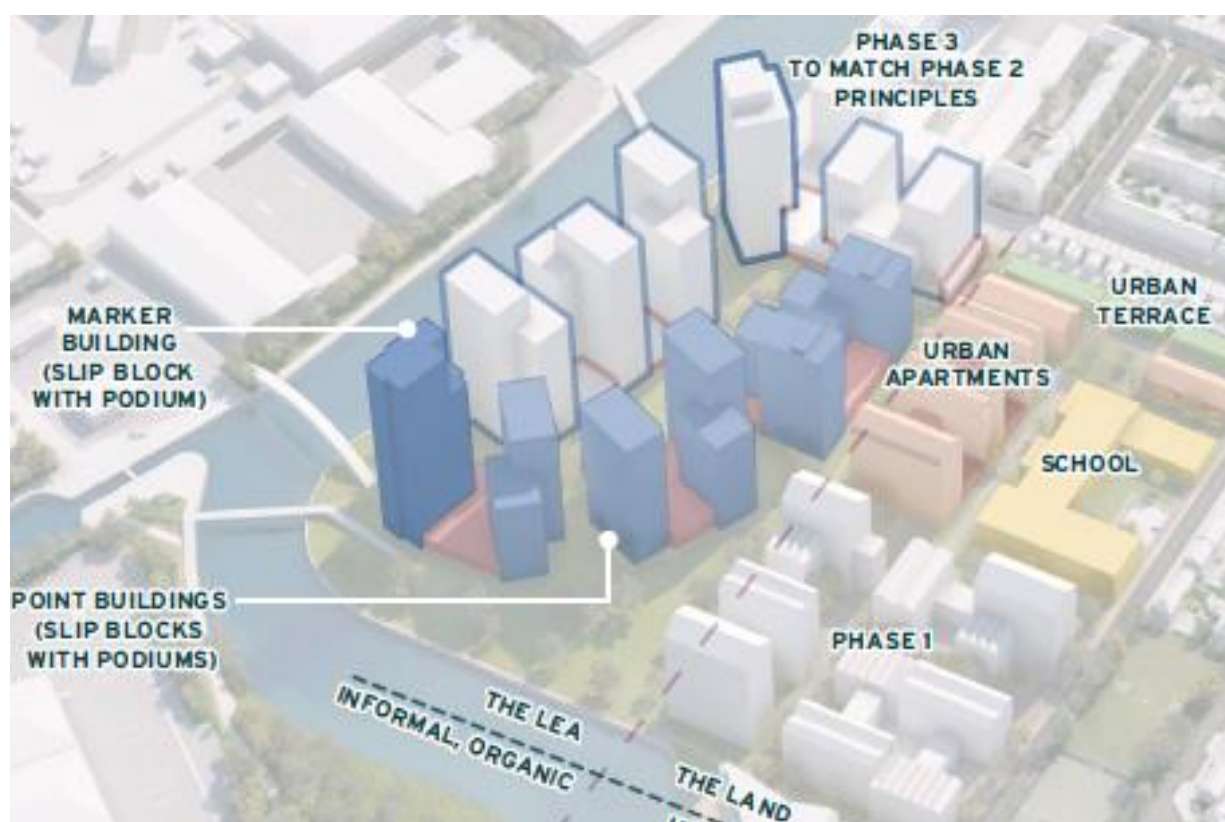


Figure 8 (above): Building typology: 'Slip Blocks'. Note, oriented approximately north-east to south-west from top to bottom.

- 2.31 The proposed Phase 2 building typology consists of 'point building' and 'podium structure' typologies from the 2019 permission. Together these are referred to as 'slip blocks', in reference to the design which merges two buildings at lower levels, then separates them above.
- 2.32 The podiums offer amenities and ground floor activation, creating routes and a cohesive street frontage, while the elevated podium gardens provide views and amenities for residents.
- 2.33 The townscape narrative and building heights strategy were developed by the applicant through workshops held with LBTH and its Quality Review Panel (WRP).
- 2.34 The Proposed Development heights and density broadly follow the 'accepted principles' of the previous 2019 wider-site scheme (PA/18/02803). In the previous s

2.35 The heights of the building in the proposed Phase 2 of this scheme are as follows:

- Building A: part 43m AOD, part 60m AOD
- Building B: part 55m AOD, part 69m AOD
- Building A & B Podium link building: 14m AOD

- Building C: part 61m AOD, part 82m AOD
- Building D: part 55m AOD, part 79m AOD
- Building C & D Podium link building: 14m AOD

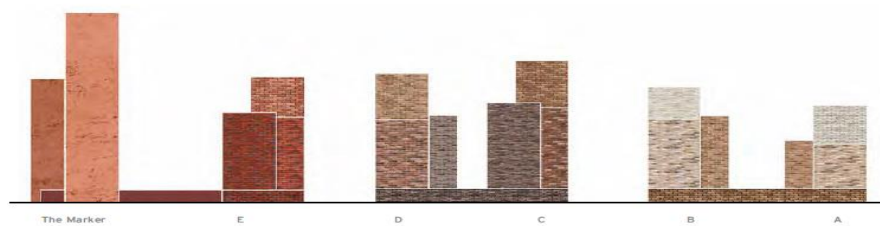
- Building E: part 56m AOD, part 74m AOD
- Building F: part 65m AOD, part 99m AOD
- Building E & F Podium link building: 11m AOD

Materials

2.36 Most buildings would be finished in brick. Buildings A & B would have three tones of brick with black, grey, and buff mortar colours. Buildings E & F would feature red tones to create a cohesive look, with Building F, the tallest and 'market' building, finished in red-toned precast concrete. Fig. 9 below indicates this.

FACADE MATERIALS

PRIMARY MATERIALS



SECONDARY METALWORK MATERIALS

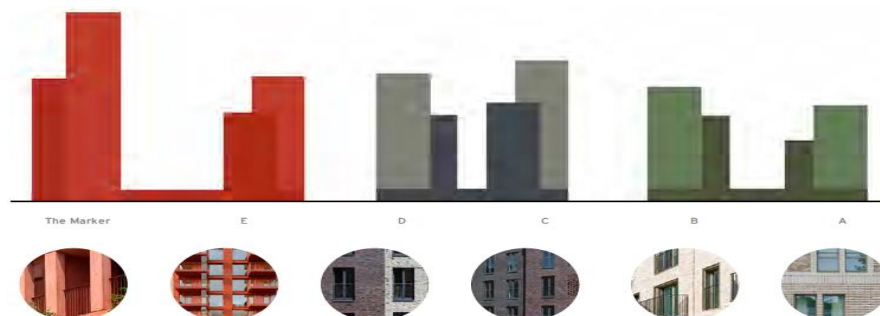


Figure 9: materials

2.37 Each set of buildings would have different brick colours and bonding, while maintaining a red tone for consistency. Three different tones of brick are used to reference the lower, middle and upper sections of the buildings, with a complimentary range of mortar colours

- 2.38 The entrance designs would use brick that matches the building above, with dark grey mortar for a robust building case. Residential lobbies would feature precast concrete for visibility and surveillance and are designed to contrast with the surrounding materials to 'stand out' as entrances.
- 2.39 The buildings would feature metalwork to balconies and openings, including railings to penthouse homes and the podium parapet treatment, as well as regular treatments of coloured perforated metalwork at 'street level' serving ground floor entrances/frontages such as cycle stores and perforated curtain walling. The metalwork would be coloured in greens (Buildings A & B), greys (Buildings C & D), reds in keeping with the building design/palette (Buildings E & F).

Layout, access, and servicing/parking

- 2.40 The proposals are designed to integrate with the existing approved wider site masterplan (PA/18/02803). It maintains the connections between the site allocation scheme and the surroundings.
- 2.41 As seen in the site plan, the proposals at Phases 2 and 3 sit deeper into the wider development site. Most of Phase 2 is bounded by parkland in the central part of the site. This parkland comprises Park Phases A and B, and the landscaped 'Green Link' of Phase 1 which serves as the primary link between it and Leven Road. The rest of the site boundary, at the south/southeast, lies adjacent to Phase 4.
- 2.42 The pedestrian and cycle routes directly connecting this proposal (both full detailed phase 2 and outline phase 3) to the rest of the site would therefore be taken from the adjoining public parkland and Phase 4. Access would take place through The Green Link within Phase 1, Leven Walk (the paved street between Phase 2 and Phase 4 leading to the central park), and 'The Avenue' which is a movement route within Phase 4. These continue through the site adjoining the proposed residential buildings and onwards to Phase 3. This will allow movement toward Leven Central open space area, the River Lea, riverside walk and, if/when delivered, the future Mayer Parry Bridge within Phase 3.
- 2.43 At 'Leven Central', a landscaped area between the buildings of Phases 2 and 3 would provide pedestrian/cycle and vehicle movement routes within these phases. These would connect with the above surrounding network within the wider site.
- 2.44 The application does not seek to secure planning permission for the two potential bridges, which would be subject to a separate planning application if such proposals materialise, and which lies outside the control of the applicant.
- 2.45 The proposed development prioritises inclusive design to accommodate residents, visitors, staff, and the wider community. Emphasis and priority are placed on pedestrian and cyclist access, with vehicle access provided to serve the development and allow drop-offs close (within 50m) to building entrances.
- 2.46 A summary of the key access provisions in the scheme is listed as follows:
- Incorporation of the principles for inclusive design wherever possible
 - Accessible routes to connections with local pedestrian routes and public transport
 - Safe spaces and routes for pedestrians and cyclists, segregated from vehicle traffic
 - Vehicle route to the main entrance of each building to allow drop-off points close to the entrances
 - Provision of 49 no. accessible car parking spaces within the detailed element of Phase 2

- Accessible cycle parking space for residents within sheltered and secure stores, plus staff and visitor cycle parking at street level across the public realm
- Step-free access to all parts of the buildings, including balconies and roof terraces;
- 90% of dwellings will be designed to meet Building Regulation M4(2);
- 10% of the dwellings will be designed to meet building regulation M4(3);
- Access to a second lift for all residents of wheelchair accessible homes at upper levels
- Emergency evacuation strategy for disabled people to include the use of evacuation lifts

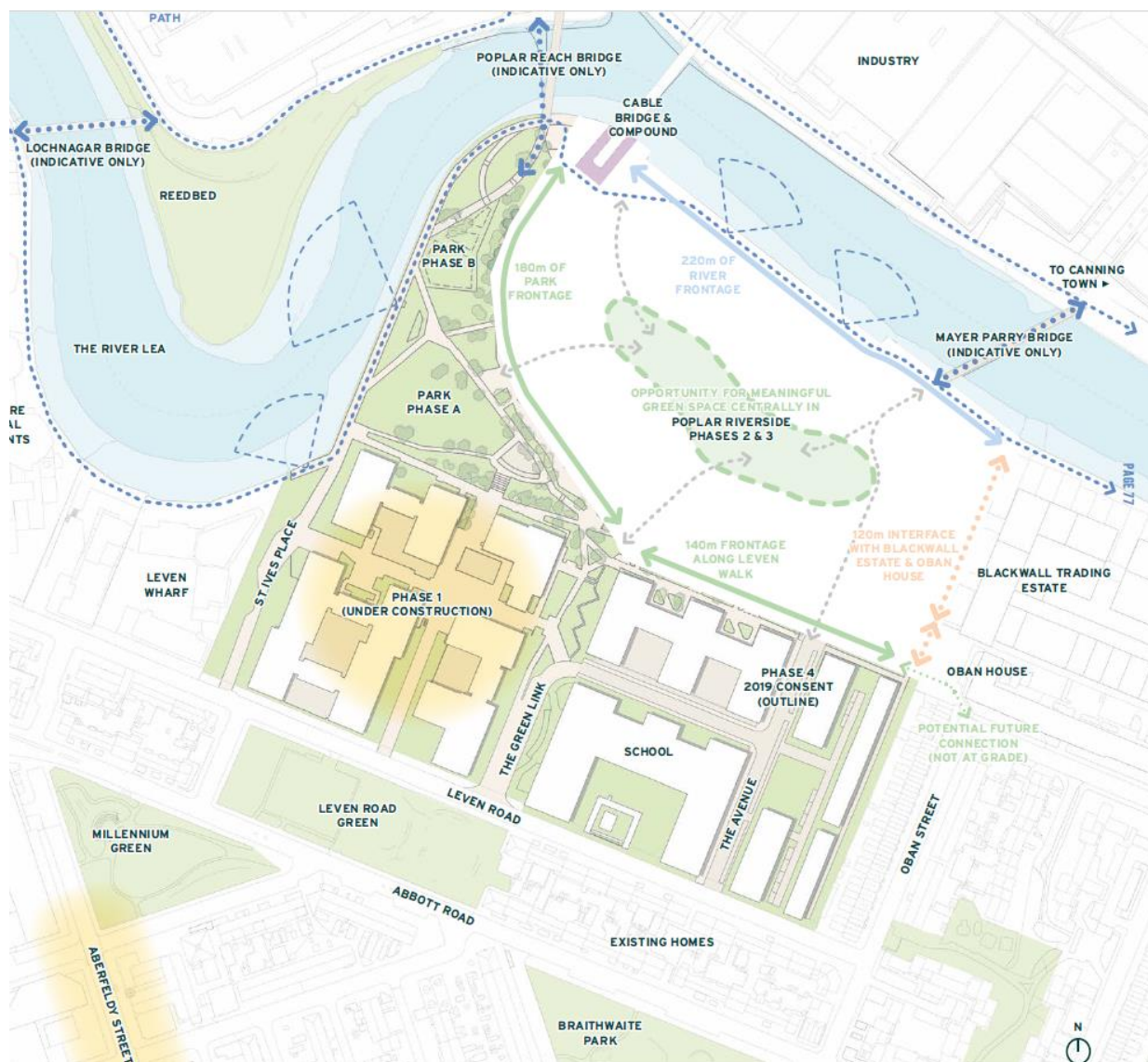
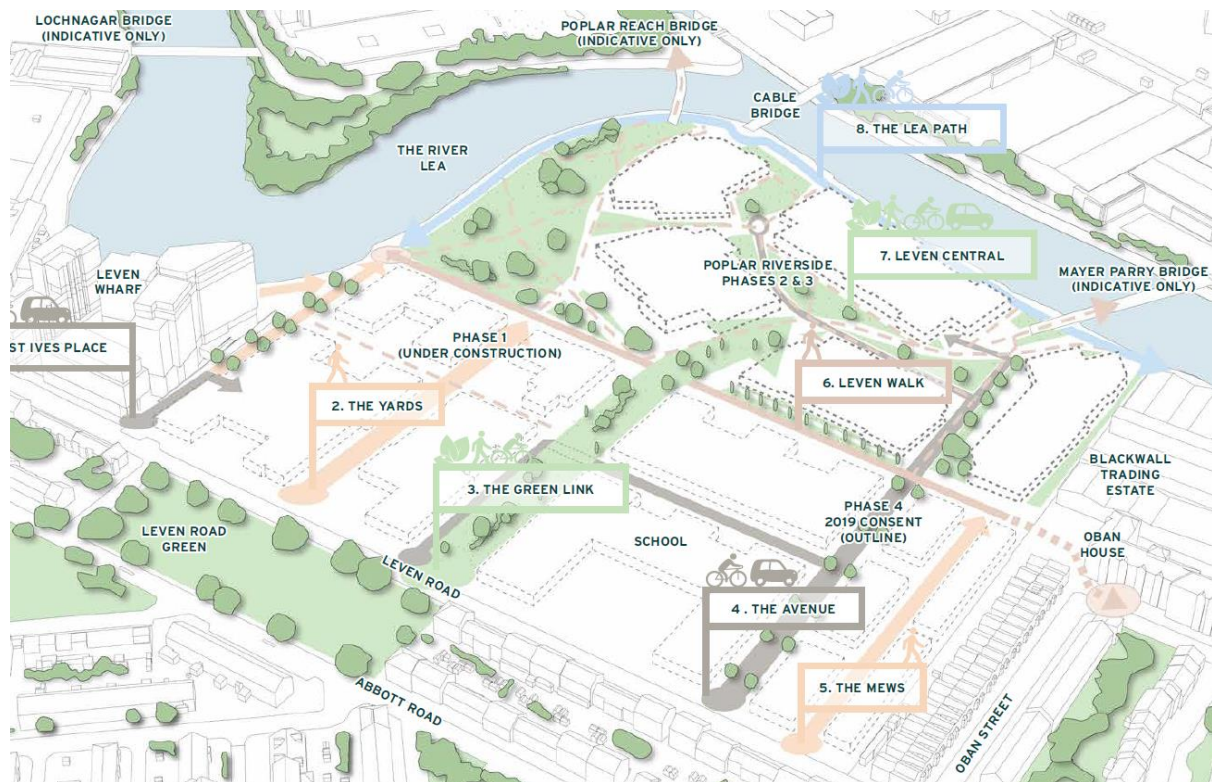


Figure 10 (above) and 11 (below): access and movement routes



Vehicle access (Phases 2 and 3):

- 2.47 The proposal would feature a two-way vehicular route which would connect with all buildings to provide servicing and entry-access through the 'Leven Central' area (Phases 2 & 3) up to Building F at the northwest of Phase 2, where there will be a turning point. An additional vehicular route would spur off the above Phase 2 route toward the Mayer Parry Bridge safeguarded landing area through Outline Phase 3. Vehicular access to the site vehicular route would be gained from the south/southeast of Phase 2 where the route would connect to 'The Avenue' which is the access road in Phase 4 which connects with Leven Road.

Resident Car Parking:

- 2.48 The original 2019 permission included resident's basement car parking for Outline Phases 2-4 at a maximum of 0.20 spaces per unit, capped at 550 units within the outline component. This proposal would reduce this to 0.03 car parking spaces per unit, capped at a maximum ratio of 0.05 spaces per unit. This version of Phases 2 and 3 no longer includes basement car parking and proposes an overall reduction in the number of car parking spaces (3% combined across both phases compared to 20% in Phase 1). The parking would no longer be provided in basement, but instead at ground floor level.
- 2.49 All buildings within Phase 2 would have access to parking at ground level, located within the podium in each building parcel. Vehicular access would be from the above internal vehicular route running through 'Leven Central' and controlled by fob access, with secure gating throughout. Sufficient lighting and wayfinding measures would feature for safety and security.
- 2.50 52 resident car parking spaces would be provided within Phase 2. 49 (94%) of these would be wheelchair accessible, designed to meet requirements under M 4(3) of the building regulations in this respect. These would be specifically allocated and restricted to the occupiers of the wheelchair user dwellings. The remaining 3x spaces would be standard parking spaces, to be located across the podium buildings. They would be allocated by the Housing Association provider.

- 2.51 A minimum 20% of the total Phase 2 parking provision (11 spaces) would be provided with electric charging points and the remaining 80% (41 spaces) with passive provision in the scheme.

Resident Cycle Parking:

- 2.52 Residents would have access to secure bicycle stores located on ground floor to serve each of the building cores, with additional provision for short stay visitor spaces located within the surrounding landscaping.
- 2.53 The proposal would provide 1,662 long-stay cycle parking spaces for residents. These would be located at ground level within the podium space for each block, accessible from facades of all buildings and from within each of the building cores. 48 residents short stay cycle parking spaces are proposed. Additional provision for short stay visitor spaces located within the surrounding landscaping.
- 2.54 Numbers are calculated from the ranges outlined in the London Plan, with 20% allocated as Sheffield stands.

Commercial Cycle Parking:

- 2.55 Commercial operators would have 9 secure long stay cycle parking spaces within Building C/D podium, and 32 short stay spaces accommodated within the landscaping. These would be secured by condition.

Commercial Servicing, Loading and Parking Access:

- 2.56 Servicing, deliveries, refuse collection and emergency access for residential units in Buildings A-F and commercial units within Buildings C-D would take place via the vehicular route within the site which is accessed off Phase 4 (The Avenue). This route would also serve the future development at Outline Phase 3. The site layout provides for street-level loading bays for commercial parking/loading.

Landscaping/public realm and play space:

- 2.57 The proposals include comprehensive hard and soft landscaping. This is designed to integrate with that already approved in the wider approved scheme which the proposals would 'slot into'.
- 2.58 Officers highlight and acknowledge that this submission includes landscape details for the entirety of Phases 2 and 3 even though this application is limited to full detailed planning permission for Phase 2. Phase 3 would be limited to an outline planning permission, with landscaping a 'reserved matter' to be approved at a later date.
- 2.59 However, the fundamental details provided in the parameter plans for Phase 3's outline planning application enable Officers to understand the broad parameters which the landscaping for that scheme would work within. This includes aspects such as the building footprints, heights etc. As a result, while the landscaping for Outline Phase 3 at a future date, Officers are confident in assessing the full landscaping details of Phase 2 in the context and understanding of their intended interaction with the indicative landscape proposals for phase 3 which are also shown. For either scheme to 'work', the landscaping details will need to be compatible as shared elements overlap, such as the Leven Central play space in phase 3, which adjoins the landscaping in Phase 2.
- 2.60 Public spaces would be integrated within the proposed details for Phase 2 up to the River Lea, with significant hard and soft landscaping provided within Phase 2.

Landscaping would also be provided at podium and roof levels in the form of living roofs, trees, shrubs, playground and shared and private amenity spaces.

- 2.61 As with phase 1 of the existing wider scheme, most planting is intended to reflect the riverside character of the Lea Valley. These landscapes feature rain gardens, areas of open water, water tolerant planting and mature trees reflective of a riverside environment. Leven Central at the centre of phases 2 and 3 would be a more parkland environment with large amenity lawns, colourful ornamental planting beds and mature trees. The podiums will be far more ornamental in character, with plants that offer year-round interest, permanent structure and resilience to high footfall and activity.
- 2.62 In terms of hard landscaping, the proposals outline how material have been chosen for their low carbon credentials, robustness and their aesthetic, which reflects the industrial nature of the former gas works site. Within the public realm, the primary materials are multi-toned permeable concrete block pavers to the avenue, resin bonded gravel surfacing to footpaths, and clay effect concrete paving surrounding particular buildings. Edging would be limited to granite effect concrete kerbs and flush aluminium profiles. The podiums would feature timber decking and street furniture alongside a variety of paving types including, concrete block, clay effect and play surfacing. The use of granite has been limited to small areas to reduce the carbon impact of the scheme. Cycle stands, litter bins and street furniture will continue the aesthetic established in phase 1.
- 2.63 Detailed commentary and visuals of specific landscaping and areas is provided in Chapter 3 (pages 113-129) of the Design and Access Statement (DAS). Pages 137-139 comment on the proposed planting and tree planting strategies. As an overview, Officers highlight some of the most notable landscaped areas and features specific to this application for Phase 2 detailed full planning permission below:
- 2.64 *Leven Central (part of Outline phase 3, but adjoining and integrated with Phase 2):*
- Landscaped in response to sun patterns, with the access road serving the various buildings positioned along the southern edge where conditions are predominantly shady. Features raised tables along the length of the road, to slow traffic speeds and indicate pedestrian priority.
 - Features series of large multi-functional lawn spaces, flanked by expansive planting beds to the north.
 - The multi-functional lawn spaces benefit from increased sunlight and help
 - to separate the residential private gardens from the wider public realm.
 - Resident's facilities offering natural surveillance and large spill out space on the north of the space.
 - Landscaping designed envisioning use for future residential and community
 - Events, with play elements featuring to complement this.



Figure 12 (above): Leven Central



Figure 13 (right): Leven Walk.

2.65 Leven Walk:

- Robust planting and mature trees providing seasonal and year-round interest.

2.66 Mayer Parry Bridge Landing:

- A hard-landscaped vast open public piazza (adjacent mixed ground floor users and building entrances designed to bring provide activity and 'life').
- Finished in a multi-toned paved surface offering ease of movement, but also flexibility for community events and play.
- Envisaged design could be adapted to enable and future strategic cycle routes (using the potential bridge crossing) by featuring a different paving finish alert users to any shared modes using it.

- Designed to capture both morning and afternoon sun for use by residents and visitors for a lunch spot, coffee etc, with series of mature trees, providing shelter, shade and colour.
- Northern side would feature a series of grass terraces which takes advantage of levels-drop as they lower to meet the River Lea. Predominantly soft-landscaped with planting and trees, and views of the river.



Figure 14 (above): Mayer Parry bridge landing



Figure 15 (above): Green Link

2.67 The Green Link:

- The proposals at the 'Green Link' for Phase 2 are a continuation of the character of the 'Green Link' delivered in phase 1, integrating with it.
- A series of rain gardens featuring naturalistic and water tolerant planting.
- A Scandinavian plank path will weave through the planting beds, linking with decking, stepping stones and sections of amenity lawn, providing informal play on the way opportunities for a variety of age groups.
- Habitat features such as fallen logs, permanent areas of water and plant species which support a wide variety of wildlife

- Designed with hard landscaped routes intersecting it to service the various access points around the buildings and fire tender routes and respond to key desire lines for clear wayfinding.

2.68 The illustrative landscape masterplan is indicated in figure 16 below:



Figure 16 (above): illustrative landscape masterplan

- 2.69 Full details of the play spaces proposed are provided in pages 129-137 of the Design and Access Statement. Play elements and facilities would be provided range of forms within both public and private realms to serve all age ranges. These comprise doorstep play/local areas of play (LAPS), ‘play on the way’ features, and space for creative, unstructured and imaginative play within areas accessible only to residents. This includes enclosed rooftop podiums and circulation spaces, supported by public realm areas and supplemented by a small internal provision for ages 0-4 within the podium of Buildings A-B. The spaces offer a range of choices to provide children with diverse experiences, including quiet spaces and gathering areas for social interaction.
- 2.70 Approximately 4,617 sqm play space is proposed for the residential units within Phase 2 which meets the GLA benchmark standards. This is broken down to 1,681 sqm of Under 5 (Doorstep Play and LAPS), 1,427 sqm 5 to 11 (Play on the Way) and 1509 sqm 12+ (Space for Imaginative Play). These areas would combine with and complement the residents’ communal amenity areas and the wider public open space provision.
- 2.71 The provision within Phase 2 should also be viewed in the context of the wider scheme which the proposal would slot into. The 1-hectare new public park (works underway) forming part of the existing wider permission’s provision would provide further opportunities for informal play. Overall, the proposal provides a wide range of provision

of 12+ play space offering something different and complementary to existing provision in the local area.

2.72 Overall, Officers consider that the proposals for play space are well-considered, of suitably quality, and located and spread in places where they are convenient and easily accessible to residents. Furthermore, the play space provision and quality is considered a marked improvement over that in the original scheme owing to the revised layout and form of this proposed development.

2.73 A figure of 2,578 m² of open space for play and recreation is proposed within Phase 3 which would comprise doorstep play areas on podiums and dedicated play space to ensure accessibility to all future residents, combined with play areas spread throughout the public open spaces interspersed between the buildings, alongside the river and within Leven Central, meeting the GLA benchmark standards.

2.74 Officers draw attention to the fact as this application is limited to outline planning permission for Phase 3, the final housing mix for the entirety of the proposals would be confirmed at a future stage when a reserved matters application is submitted for Phase 3. This means the exact play space requirement cannot be calculated at this stage. However, the proposed details have been designed based upon assumptions on the likely mix to ensure the entirety of the scheme (Phases 2 and 3) will provide for sufficient play space per block within each phase and where possible exceed the GLA target.



Phase 2 Play Provision

KEY

- 0 - 4 Years
- 5 - 11 Years
- 12 - 18 Years
- Internal Play Space
- Intensive Green Roof
- Amenity Roof Terrace for Residents
- Phase 2 Detail Boundary

Phase 2 - 989 Units

Age Range	Policy requirement (sq m)	Actual Provision	Internal Provision
0-4	1,679	1,452	229
5-11	1,427	1,427	0
12-18	1,509	1,509	0

Total - 4,615 Total - 4,388 + 229

Figure 17 (above): Play provision

Accessibility:

- 2.75 The submitted details outline how the site layout considers accessibility. They have been carefully designed with consideration for the requirements of all users of all abilities and ages, in accordance with London Plan Policy D5 (Inclusive Design).
- 2.76 Priority is given to non-vehicular users, whilst enabling vehicular access to adequately serve the development, including the provision of access by vehicles to the main entrances of buildings to allow those who cannot walk long distances to be dropped off close to the entrances. Drop off points are located within 50m of building entrances. Vehicle routes would be clearly marked and separated from a pedestrian 'safe zone'.
- 2.77 Main footpaths would be at least 1.8m wide (2m where possible) while secondary routes no less than 1.2m wide. Routes are level or gently sloping, with firm and smooth walking surfaces and continuous detectable physical edges for the visually impaired. Resting areas are also provided.
- 2.78 Internally, buildings are designed with full consideration of access requirements. Step-free access to all parts of the buildings would feature, including balconies and roof terraces. 10% of dwellings would meet the M4(3) standard. 90% would meet the M4(2) standard. Communal entrances are designed to meet guidance set out in The Building Regulations 2010, Approved Document M, travel distances to dwellings have been minimised through appropriately placed building cores, and buildings would be served by at least two lifts and two sets of stairs.
- 2.79 The proposal incorporates policy-compliant accessible car parking space. These would be allocated to users who require them.
- 2.80 Access to communal residential amenity space would be step-free, and play areas are provided for different ages. The proposals for the development demonstrate that a good level of inclusive design will be achieved by the finished scheme.

3. RELEVANT PLANNING HISTORY

- 3.1 Various applications have been submitted and determined since the original wider-site masterplan scheme (PA/18/02803). These primarily relate to approval of details to discharge conditions attached to that permission, or applications seeking non-material amendments to amend conditions or other aspects of that scheme. As the list is comprehensive and primarily relate to Phase 1 of the wider scheme, only the key applications which impact or interact with the proposal are listed below:
- 3.2 PA/23/02038 - Minor Material Amendment to Planning Permission reference PA/18/02803/A1, dated 30 October 2019, to vary the wording (see application cover letter) of Condition 2 of planning permission PA/18/02803 to facilitate a drop-in application (ref. PA/23/02037). – Currently under determination
- 3.3 PA/21/01989 - Submission of details pursuant to condition No.31a (Strategy for maintaining and improving the flood defences) for phase 1 to part discharge of Planning Permission Ref: PA/18/02803, Dated 30/10/2019. – Granted 10/10/2024
- 3.4 PA/23/00527 - Details of all Reserved Matters (Appearance, Landscaping and Layout) pursuant to Outline Planning Permission reference PA/18/02803 dated 30/10/2019 relating to Park Phase A. – Granted 29/05/2024
- 3.5 PA/23/00796 - Submission of Details Pursuant to Condition No.33, Part 1 (Proposed Installation of Retained Elements of Gasholder 1) of Planning Permission reference:

PA/18/02803 dated 30/10/2019, as amended by Non-Material Amendment reference PA/21/01883 – Granted 25/05/2024.

- 3.6 PA/21/00416 - Temporary permission up to 10 years for the erection of sales and marketing suite building. - Granted 05/05/2021
- 3.7 PA/23/02340 - Deed of Variation to incorporate [various] amendments to the s106 agreement of planning permission ref. PA/18/02803 dated 30/10/2019 – Granted 04/02/2021
- 3.8 PA/20/00908 - Temporary permission up to 10 years for the erection of sales and marketing suite building. Granted 29/06/2020
- 3.9 **PA/18/02803** – ‘A hybrid planning application (part outline/part full) comprising:
- 1.) In Outline, with all matters reserved apart from access, for a comprehensive mixed-use development comprising a maximum of 195,000 sqm (GEA) (excluding basement and secondary school) of floorspace for the following uses:
- Residential (Class C3);
 - Business uses including office and flexible workspace (Class B1);
 - Retail, financial and professional services, food and drink uses (Class A1, A2, A3 & A4);
 - Community, education and cultural uses (Class D1);
 - A secondary school (Class D1) (not included within the above sqm GEA figure);
 - Assembly and leisure uses (Class D2);
 - Public open space including riverside park and riverside walk;
 - Storage, car and cycle parking; and
 - Formation of new pedestrian and vehicular access and means of access and circulation within the site together new private and public open space.
2. In Full, for 66,600 sq.m (GEA) of residential (Use Class C3) arranged in four blocks (A, B, C and D), ranging from 4 (up to 23m AOD) 5 (19.7m AOD), 6 (up to 26.9m AOD), 8 (up to 34.1m AOD), 9 (up to 36.3m AOD) 12 (up to 51.3m AOD) and 14 (57.6m AOD) storeys in height, up to 2700 sq.m GIA of office and flexible workspaces (Class B1), up to 500 sq.m GIA community and up to 2000 sq.m GIA leisure uses (Class D1 & D2), up to 2500 sq.m GIA of retail and food and drink uses (Class A1, A2, A3 and A4) together with access, car and cycle parking, energy centre, associated landscaping and new public realm, and private open space.

The application is accompanied by an Environmental Statement. - **Granted 30/10/2019.**

4. PUBLICITY AND ENGAGEMENT

Pre-application

- 4.1 The applicant has submitted a Consultation Statement (Statement of Community Involvement) which sets out the non-statutory consultation undertaken by the applicant. This included two public consultation events (November 2022 and August 2023).

- 4.2 The applicant engaged with the Local Planning Authority through its formal pre-application advice service prior to submission of this application, including presenting the scheme to the Council's Quality Review Panel (formerly called CADAP) twice, in April and November 2022.

Statutory application consultation

- 4.3 In terms of the Council's statutory consultation process 2780 neighbour letters were sent to nearby residents on 4th January 2024. Site notes were erected, and a press notice was published.
- 4.4 A second re-consultation was undertaken on 25th July 2024. This was solely pursuant to Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) due to receipt of further/revised information in the Environmental Statement comprising amendments to the Non-Technical Summary and the Townscape and Visual Impact Assessment.
- 4.5 One response from a member of the public was received. It response to the initial statutory public consultation and objected to the proposal on grounds summarised as follows:
1. Not enough affordable housing is proposed
 2. private tenure dwellings could be rented out leading to transient population
 3. the proposed studio units would not provide sufficient living space
 4. loss of light to neighbouring occupiers
 5. inadequate consultation by the developer

5. CONSULTATION RESPONSES

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

External responses

Canal & River Trust (CRT)

- 5.2 Raised concern about the height of the proposal given it has increased in this proposal compared to the last, and their desire to set taller buildings away from the water's edge. Also requested that the waterborne freight study considered in the transport chapter of the ES also considers removal of demolition waste.
- 5.3 Encourage the establishment and improvement of walking and cycling links to the Limehouse Cut and River Lee Navigation, through wayfinding and signed cycle-routes.
- 5.4 Note that remediation conditions relating to the site already exist from the earlier 2019 permission and are still being discharged. The CRT wish to highlight that care should be taken in the design to ensure that any new surface water drains connecting the site to Bow Creek do not create preferred routes for ground contaminants and perched groundwater to enter Bow Creek.
- 5.5 Conditions requested to secure full details of the proposed landscaping and ongoing landscaping management scheme to including details of reed beds, their fixings, and the attenuation ponds.
- 5.6 Request informative is attached to any grant of planning permission to advise the applicant/developer of the CRT Code of Practice for works affecting the CRT, including the need to obtain any necessary consents and liaise with their engineer, and the need

to consult the CRT if temporary works within/cover sailing Bow Creek are proposed so they can notify mariners.

Environment Agency

- 5.7 No objection subject to conditions and recommend informatives to be attached to the grant of planning permission.

Lea Valley Regional Park Authority

- 5.8 No objection subject to Community Infrastructure Levy contributions from the developer the funding of the Poplar Reach and Mayer Parry bridges and conditions to secure, via consultation with the Lea Valley Regional Park authority:

1) further details to be provided on the design and landscaping of the riverside path to meet various access and recreational needs, habitats creation with planting, and signage details.

2) A lighting strategy for the construction period and post-occupation period, to take account of bats and the adjoining riverside Site of Metropolitan Importance for Nature Conservation (SMINC).

3) Provision of a site wide Landscape and Ecological Management Plan (LEMP) to cover the long-term maintenance of newly created on site habitats, particularly along the riverside and to include the monitoring of the effects of Phases 2 and 3 development, upon the condition of the neighbouring SMINC.

4) Provision of a Construction and Environmental Management Plan to protect the River Lea and other habitats from construction impacts.

Department of Levelling Up

- 5.9 No comment

Greater London Archaeological Advisory Service (GLAAS)

- 5.10 No objection – no further conditions (those previously requested for PA/18/02803 were imposed on-site and since discharged to their satisfaction, hence no further requirements for the proposed development on this site).

Historic England

- 5.11 No comment

Health and Safety Executive (HSE)

- 5.12 No objection - HSE is satisfied with the fire safety design measures in relation to the detailed element of the scheme, to the extent that it affects land use planning.

- 5.13 HSE highlight that there is insufficient information to comment on the outline application (due to the nature of an outline permission which does not feature full details), which would be dealt with at the later 'reserved matters' application stage.

- 5.14 As such, they request conditions to require they are consulted at the reserved matters application stage, and to require the submission of a satisfactory fire statement with any reserved matters application.

Mayor of London (GLA) (Stage 1 Report)

Summary of the Stage 1 report:

- 5.15 Land Use Principles: The proposed optimisation of this residential-led mixed use development in an opportunity area with commercial floorspace is supported in principle.
- 5.16 Affordable Housing: The proposal would deliver an affordable housing provision of 35% (habitable room) comprised of 96% Affordable Rent and 4% intermediate in Phase 2, and 47% Affordable Rent and 53% intermediate in Phase 3 is supported in principle. This should be secured via the legal agreement in line with London Plan Policy H6. An early-stage viability review is required.
- 5.17 Urban Design and Heritage: The masterplan has been revised to include significantly greater height and density. Refinements are required to ensure that the building arrangement and height does not negatively impact on the quality of the spaces and public realm within the scheme, or on residential quality, and that environmental impacts are avoided and/or mitigated. The proposals are considered to result in a low level of harm to heritage assets.
- 5.18 Architectural quality: The architectural approach is broadly supported. Overall, greater attention should be paid to the treatment of the lower storeys, to ensure that the development offers a “human scaled” experience at ground level and dual aspect should be maximised. Officers continue to encourage further increases in dual aspect dwellings, which currently is proposed as 59%
- 5.19 Transport: An increased local connectivity contribution (enhancing that established at outline stage) for the delivery of bridge links is required to secure the necessary step-change in connectivity to Canning Town, and other local connectivity matters identified in the applicant’s connectivity study which will facilitate the sustainable travel of future site users. Clarification is required on vehicular trip distribution and for management of construction and deliveries and servicing, and a revised design for cycle parking.
- 5.20 Functional Impacts: Further consideration required regarding local connectivity, access to public transport, car parking, deliveries and servicing, and construction logistics which will be concluded at [future] Stage 2. Any aviation, navigation or telecommunication impacts arising from the development should be suitably addressed
- 5.21 Environmental issues: The proposal must ensure environmental impacts (such as daylight/sunlight and wind), which would be greater than the extant scheme due to the greater density and height of this proposal, are suitably mitigated. Note that biodiversity and urban greening details should be explored and maximised further.

Metropolitan Police (Designing Out Crime Officer)

- 5.22 No objection.
- 5.23 Welcomed earlier pre-application discussions with the applicant. Request Secured by Design (SBD) measures feature throughout the proposals (buildings and landscaping etc.) in accordance with planning policy, achieved by planning conditions to:
- 1) Demonstrate how the principles and practices of the SBD scheme have been included and incorporated into the development, which shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police Designing Out Crime Officer and implemented.
 - 2) Require a SBD certificate or letter from Metropolitan Police Designing Out Crime Officer showing full compliance with required SBD measures prior to the first occupation of the new dwellings.

5.24 Request an informative is attached to the grant of planning permission advising applicant of how to engage with the Metropolitan Police Designing Out Crime service.

Natural England

5.25 No objection – the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Thames Water

5.26 No objections subject to conditions (piling method statement to be approved prior to piling works, and confirmation of competition of water network upgrades required or a development and infrastructure phasing plan to be agreed, before occupation) and informatives.

TFL

5.27 No objection subject to further work, securing S106 legal agreement contributions, and securing details by planning conditions, summarised as follows:

5.28 The creation of a new high density mixed used neighbourhood at this site must deliver an increase in connectivity otherwise it risks the development being in an isolated location with poor transport links that will be unable to support a car free lifestyle. TFL see the delivery of pedestrian/cycle bridge links over the River Lea as integral to creating a healthy, permeable, sustainable development that is aligned to the Mayor's Good Growth agenda.

5.29 While the application safeguards for bridge landing points, to ensure the timely delivery of at least a new connection to Canning Town as essential site-specific mitigation, a specific significant contribution towards the delivery of a bridge connection is supported.

5.30 In addition to this, a (£150,000) contribution towards Canning Town interchange, to be used in conjunction with mitigation secured from other sites, will support improvements to access within and immediately outside the Underground /DLR station and bus station.

5.31 Further work is required in relation to the following:

- Clarification of updated vehicular distribution onto the local and strategic highway network
- Improvements to cycle parking provision across all buildings, and in particular Block A / B and C / D, and identifying secure parking for non-residential uses
- Subject to other site wide design amendments to ensure safe routes to bridge landing points

5.32 Appropriate S106 obligations should be included in Heads of Terms:

- Contribution to Lower Lea Valley bridge connectivity
- Continued safeguarding of multiple bridge landing points
- Local Connectivity Study - Highway and public realm works for improvements to highways and the public realm in the vicinity of the site and which are not being delivered as part of any other site – to be discussed and secured with Tower Hamlets Council authority.
- Contribution towards Canning Town interchange - £150,000 payable to TfL
- Restricting on-street car parking for occupiers / employees

5.33 Conditions should be secured for:

- Car Park and Design Management Plan
- Disabled persons parking and electric vehicle car parking provision

- Delivery and Servicing Management Plan
- Details of long stay and short stay cycle parking and facilities
- Construction Logistics Plan
- Car club membership for eligible occupiers
- Travel Plans

London City Airport

- 5.34 No objection subject to conditions limiting the heights of buildings and structures (higher than proposed so no conflict) and a bird hazard management plan, and informatives regarding crane methodology and notification of erection of cranes.

Sport England

- 5.35 No objection. Encourages CIL money to be spent on sports facilities.

Port of London Authority

- 5.36 No objection.
- 5.37 Suggested conditions and various measures and approaches towards safeguarding land for river crossings, landscaping details, securing riparian lifesaving infrastructure and lighting as per the approach of the previous planning permission, ecology measures to be agreed, and securing measures to encourage consideration of use of the river for construction transport as part of the Construction Logistics Plan /CEMP to be agreed. Also request an informative advising the applicant of PLA licencing requirements.

NATS

- 5.38 No objection.

Internal responses

LBTH Biodiversity

- 5.39 At present, the LPA does not have qualified internal Biodiversity Officer.
- 5.40 The LPA therefore consulted a qualified external consultant to review the proposals on biodiversity/ecology grounds. To form a complete view, they require further information on post-development habitats and a detailed assessment of existing habitat conditions to be carried out first.

LBTH Energy Efficiency/Sustainability

- 5.41 No objections subject to conditions below, and securing carbon offset payment/contribution in the Section 106 legal agreement:
1. Final details of PV specification demonstrating energy generation maximised with Biosolar roofs installed where feasible.
 2. The carbon savings are delivered as identified in the Energy Statement
 3. Post completion report (including As Build calculations) is submitted to demonstrate energy / CO2 savings have been delivered.

5.42 LBTH Community Infrastructure Levy (CIL) Team

- 5.43 No objection. Highlight that for this development to be recognised as a phased planning permission, a phased planning condition should be attached to the planning

permission to require a phasing plan to be submitted for the outline element before commencement of development.

- 5.44 To avoid delays, recommend that an area schedule to show the GIA on a floor-by-floor basis against charging rates in order to speed up the Council's GIA validation of the approved drawings. This could be attached as an informative to the decision notice.

LBTH Environmental Health (Contamination)

- 5.45 No objection subject to conditions to check for potential ground contamination, remediate (make good), and verify that any ground contamination has been successfully addressed.

LBTH Environmental Health (Noise)

- 5.46 No objection subject to a number of conditions to:
1. Ensure proposals are constructed to protect against noise impacts
 2. Require a post-completion verification report, including noise test results, to demonstrate construction to the required noise protection measures/standards.
 3. A 'S61 Restrictions on Demolition and Construction Activities' condition

LBTH Environmental Health (Air Quality)

- 5.47 No objection subject to conditions summarised as:
1. Dust management plan including PM10 continuous monitoring
 2. Air quality standards for boilers
 3. Kitchen extract standards for commercial uses
 4. Construction plant and machinery (all Non-Road Mobile Machinery) details
 5. Requirement for an air quality neutral assessment for any emergency generators installed
- 5.48 Plus recommend PM10 monitoring information informative and Air emission flue informative.

LBTH Health and Safety Officer

- 5.49 No objection. Highlight relevant health and safety considerations which can be attached as informatives to the decision notice if planning permission is granted.

LBTH Public Health Officer

- 5.50 Detailed comments provided, predominantly raising queries incompatible with a 'live' application stage where the proposal details are under consideration and no longer at a conceptual pre-design state. Comments primarily cover issues directly addressed by specialist consultees and/or addressed by Officers in this report. Comments summarised as follows:

Housing design:

- Queries regarding 'compliant' levels of daylight and its impact by room, unit type, and tenure.

- Commentary on a desire to increase natural light for residents working from home, and queries and suggestions for alternative designs.
- Opinions provided on what rooms to priorities for daylight and where windows should feature, be added etc., requesting alternative plans to be submitted instead.
- Opinions and criticism provided on specific aspects of the housing layouts, details of building arrangements, details of lift lobby doors etc.
- Request for applicant to assess and confirm compliance against every criterion of different housing design guidelines which are not prescribed requirements and do not all form part of the planning considerations relevant to this application.

Access to health and social care services:

- Request engagement with relevant health organisation to clarify contributions required (CIL), to a level of detail not required nor possible to require in this application.
- Query who was consulted on the child play spaces and query whether Officers should interpret the play space as community space instead. Comments made on works outside scope of this application (Phase 1 etc.) in the existing permitted scheme.
- Note the potential for the secondary school for community uses – comments and school fall outside the scope of this application, under Phase 4.
- Advise that more needs to be done to highlight community facilities to future residents.

Access to Open Space and Nature:

- Considers the amount of open space (an increase over the existing permitted scheme) insufficient based on criteria outside scope of the adopted planning policy framework.
- Concern insufficient natural light to play spaces.
- Criticism of quality of play spaces between podiums with desire for larger open spaces.
- Request for larger play spaces and demonstration of how proposal meets all of Play England principles, plus other guidelines beyond the scope of the planning policy framework.
- Criticism of access to the (existing approved, outside scope of this application) park in the wider scheme and request for details to assess elements of wider scheme already approved.

Air Quality, Noise and Neighbourhood Amenity:

- Statements made on need to adhere to noise controls/limits which are considered by other consultees/conditions/ and/or legislation.
- Suggested changing site layout to reduce noise on podiums and consideration of defensive space to podium balconies to reduce noise.
- Accessibility and Active Travel – request detailed specifics on all aspects of cycle parking and access etc. already covered by condition and other relevant consultees.
- Suggestions for allotments and queries about growing food on-site.
- Access to work and training: queries on childcare facilities and detailed requests for information on workspaces and creches for young mothers.
- Queries about how proposal would prioritise jobs to local people and those from disadvantaged backgrounds and queries on affordability.

LBTH Waste Policy & Development

5.51 No objection

LBTH Housing

5.52 No objection:

- Note that the whole site mix for the affordable rented tenure units broadly aligned with Local Plan Policy D.H2.
- The average number of units per core per block (8 no.) is acceptable and justified.
- Queried if the number of habitable rooms in certain affordable unit sizes are correct, which was checked and clarified as correct by Officers.
- Several queries were raised seeking information or assurances of details about unit mix and scheme details which lie outside the scope of this application, either in detailed Phase 1 already approved, outline Phase 4 already approved, or details in proposed outline Phase 3 which would be approved at a later reserved matters stage.

6. RELEVANT PLANNING POLICIES

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)

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

Growth (spatial strategy, healthy development)

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

Principle of the Development / Land Use (residential, commercial/business/service)

- London Plan policies: H1, E1
- Local Plan policies GG4, D.TC5, S.H1, S. EMP1, D. EMP2

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

- London Plan policies: GG2, D6, D7, H1 H4, H5, H6, H7, H16
- Local Plan policies: S.H1, D.H2, D.H3

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

- London Plan policies: D1, D2, D3, D4, D5, D7, D8, D9, D.ES8, HC1, HC3, HC4
- Local Plan policies: S.DH1, D.ES8, D.DH2, S.DH3, D.DH4, D.DH6, D.DH7

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

- London Plan policies: D3, D9, D13, D14
- Local Plan policies: D.DH8

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

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

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

- London Plan policies: G1, G4, G5, G6, D12, SI1, SI2, S13, S14, SI5, SI7, SI8, SI12, SI13
- Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.OWS2, S.MW1, D. OWS3, D.MW3

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

- National Planning Policy Framework 'NPPF' (2023)
- National Planning Practice Guidance (as updated)
- LBTH Planning Obligations SPD (2021)
- LBTH High Density Living SPD (2020)
- Leaside Area Action Plan (draft version November 2021)
- LBTH Community Infrastructure Levy (CIL) Charging Schedule (2020)
- LBTH Development Viability SPD (October 2017)
- LP Affordable Housing and Viability SPG (2017)
- GLA London Plan Guidance: Housing Design Standards, June 2023
- GLA London Plan Housing SPG (updated 2017)
- GLA London Plan Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Building Research Establishment's Site Layout for Daylight and Sunlight: A Guide to Good Practice (2022)
- LBTH Reuse, Recycling & Waste (July 2021)
- Tall Building SPD (draft version December 2021)

7. PLANNING ASSESSMENT

7.1 The key issues raised by the proposed development are:

- i. EIA
- ii. The principle of Development
- iii. Land Use
- iv. Housing
- v. Design & Heritage
- vi. Neighbour Amenity
- vii. Transport and Highways

- viii. Environment
- ix. Local Finance Considerations
- x. Planning Balance
- xi. Equalities and Human Rights

ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

- 7.2 The planning application 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) co-ordinated by Ramboll.
- 7.3 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.
- 7.4 The Council issued an EIA Scoping Opinion (ref. PA/22/00732) on 13/06/2022. The submitted Environmental Statement (ES) accords with this Opinion and assesses the environmental impacts of the development under the following topics:
- Socio-Economics
 - Noise and Vibration
 - Air Quality
 - Wind Microclimate
 - Daylight, Sunlight and Overshadowing
 - Heritage
 - Climate Change Mitigation and Adaptation
 - Traffic and Transport
 - Ecology
 - Human Health
 - Townscape and Visual Impact Assessment
- 7.5 The Council appointed RPS Group to independently examine the ES, to prepare an Interim Review Report (IRR) and Final Review Report (FRR), and to confirm whether the ES satisfies the Regulations. The Council's EIA Officer and the Council's Appointed EIA Consultants have confirmed that the submitted ES (including the subsequent ES submissions as set out above) meets the requirements of the EIA Regulations.
- 7.6 Officers highlight that the ES has assessed two separate development scenarios. One relates to the section 73 application (PA/23/02038) also under consideration, which is a procedural application to allow the version of phases 2 and 3 under this application (PA/23/02037) to 'slot into' the wider-site masterplan (approved under PA/18/02803). This scenario ensures all phases (i.e. proposed phases 2 and 3, plus the remaining extant approved phases of the entire wider site) have been included in the assessment. The other relates only to the impacts of only the proposed new version of Phases 2 and 3 (this drop-in application PA/23/00237) in isolation. This ensures all eventualities, impacts, and mitigations are considered in accordance with the EIA regulation.
- 7.7 The application has been supported by an ES, an ES Interim Review Report Response (April 2024), and an ES Final Review Report Response (June 2024), and an ES Final

Review Report Second Response (August 2024). Both review report responses included a revised Non-Technical Summary (NTS).

- 7.8 The ES Interim Review Report Response (March 2019) and its appendices were considered to be 'further information' under Regulation 25 and was processed as required under the EIA Regulations.
- 7.9 The Council's EIA Officer has confirmed that the submitted ES meets the requirements of the EIA Regulations, supported by an ES Review undertaken by the Councils retained EIA consultants.
- 7.10 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the Proposed Development, which forms the basis of the assessment presented in this report. Appropriate mitigation / monitoring measures as proposed in the ES will be secured through planning conditions and/or planning obligations. The environmental information comprises the ES, including any further information and any other information, any representations made by consultation bodies and by any other person about the environmental effects of the Proposed Development.

PRINCIPLE OF DEVELOPMENT

(i) The existing 'fallback' use/scheme:

- 7.11 The principle for the redevelopment of the wider site, encompassing this application site area, has already been established by the existing extant 'hybrid' planning permission ref. PA/18/02803, granted in 2019.
- 7.12 The 2019 decision also assessed, and considered acceptable, the principle of the 'loss of utilities' of the wider former gasworks site, which the application site sits within. Since then, the site has been cleared and is a brownfield site undergoing redevelopment. This therefore does not need to be re-assessed.
- 7.13 The extant permission comprises full details for Phase 1, which has been implemented, and outline details for Phases 2-4. Phases 2-4 as authorised by the extant permission may still be built out regardless of the outcome of this application, subject to approval of Reserved Matters Applications.
- 7.14 Officers acknowledge there are differences between the current proposals and the extant scheme. However, the principle of development in terms of planning-policy and land-use considerations, including the provision of tall buildings and similar quantum of units (maximum 100 more units in this scheme), renders the two comparable for the purposes of establishing the principle of development.
- 7.15 With respect to policy, the planning policy framework in force at the time of the 2019 permission differed from that in place now. However, the degree of divergence was not materially significant to detract from the weight given to the 'fallback position' of that permission, which has been implemented and remains 'live'. Most notably:
- a) The 2016 London Plan in force at that time contained the same in-principle approach to assessing density, based on optimising the potential of each site.
 - b) The current Local Plan, whilst not adopted at that time, had reached an advanced stage, and as such the report for that application noted that decision makers could attach more weight to its policies in the determination of planning applications. Of key relevance in the 2019 application, consistent with this current application was that it was considered to satisfy the current Local Plan Site Allocation no. 3.2.

- 7.16 No material changes to the Local Plan policy designation for the site has occurred since the Original Permission was issued, and changes in the London Plan or elsewhere in the planning policy framework are not materially significant to justify a different decision.
- 7.17 In terms of land-use, the nature of residential-led mixed-use development and the proposed land uses are replicated within this current application. They remain consistent with the Local Plan Site Allocation.
- 7.18 In this respect, Officers highlight that the non-residential planning use classes referred to in the 2019 permission have changed since 2019. This explains the difference in use classes outlined in the application description. Classes A1, A2, A3, D1, and D2 which were approved in that scheme have been superseded by the subsequent introduction of Class E. Class A4 (drinking establishments) was abolished and now falls into the category of 'sui generis' where it falls outside the defined limits of any other use class. The current application does not propose any drinking establishments. This proposal therefore proposes land use of C3 (residential) and Class E uses, consistent with the extant 2019 permission.
- 7.19 As such, the existence and similarity of the 2019 scheme, including the context under which its decision was made, carries significant weight as a 'fallback' scheme which already establishes the principle of the proposed redevelopment of the application site.

(ii) The compatibility of this 'drop-in' application:

- 7.20 This proposal is a 'drop in' application intended to 'slot in' to the approved 2019 scheme which covers the entire wider site within which the application site comprising Phases 2 and 3 lie. The 2019 scheme has been implemented and is currently being built-out. This proposal would 'drop in' the proposed version of Phases 2 and 3 into it.
- 7.21 To enable this, the outer boundary of these two phases is consistent with those of the approved scheme (internally they are different). Access arrangements/routes are compatible with the adjacent phases/the wider approved scheme. The proposed development is carpetable of successfully 'tying-in' with the extant original permission site-wide masterplan, marrying seamlessly with the layout, form and design of that planning permission. This proposal would not prejudice the implementation of that original extant planning permission throughout the remainder of the wider site. This is demonstrated in the submitted support documents, show demonstrate how the proposal would form a single integrated comprehensively conceived and designed development, together with the development authorised by the Original Permission on the remainder of the Wider of the Site.
- 7.22 The applicant would retain the option to continue the implementation of the Original Permission or to implement the Application. The procedural mechanism for doing so is dealt with in a separate Section 73 planning application under consideration (PA/23/02038).

(iii) Current planning policy framework position:

- 7.23 The National Planning Policy Framework (2023) ('NPPF') supports the principle of sustainable development and provision of high-quality homes (including affordable provision). It lends support towards making effective use of brownfield land for regeneration, and states that planning decisions should give "*substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*".

- 7.24 Table 4.1 of London Plan (2021) Policy H1 identifies that the Borough has a 10-year target of 34,730 for net housing completions (2019/20 – 2028/29). In addition to its Local Plan site allocation for residential-led mixed use development, the Site is also within the Poplar Riverside Opportunity Area (OA) of the London Plan (2021). Development proposals within OAs are expected to ‘optimise’ residential and non-residential output and densities, contributing to the minimum guidelines for employment and housing numbers.
- 7.25 The Poplar Riverside OA lies south of the Olympic Legacy Supplementary Planning Guidance area, and between the Isle of Dogs & South Poplar and Royal Docks Opportunity Areas. This (2021) London Plan OA designation replaces its location within a wider ‘Lower Lea Valley OA’ designation in the earlier London Plan variants, which was what the 2019 scheme was considered against in this respect. The OA contains the Poplar Riverside Housing Zone on the Tower Hamlets side of the River Lea. The London Plan notes that the OA itself has the potential for 9,000 new homes and improved connectivity in a part of the borough with significant infrastructure challenges.
- 7.26 In terms of delivering the potential of the OA, the London Plan notes the OA crosses the boundary of the River Lea into the London Borough of Newham (opposite the site to the north/north-west) where there are opportunities to provide both intensified employment uses and residential development. It identifies that cross-boundary working is required to maximise investment of the Housing Zone funding and the development potential of upgrades to Canning Town station and the (relatively recent) arrival of the Elizabeth line at Custom House. It states that significant local transport improvements are needed to allow better pedestrian and cycle accessibility over the River Lea via footbridges and to remove the severance effect of major infrastructure such as DLR lines and the A12 at Gillender Street.
- 7.27 The above position is consistent with the issues considered in the previous 2019 scheme, and specifically, this application again addresses and is consistent with these issues. Most notably, it does so in terms of safeguarding landing points for future bridge crossings, providing for an increase in contributions (above the 2019 scheme amount when adjusted for inflation) proportionate to the uplift in homes in this scheme to go towards future bridges, and a transport contribution.

Conclusion: principle of development

- 7.28 The principle of the proposed development is consistent with the considerations made in the consideration of, and decision to grant, extant and implemented 2019 planning permission reference PA/18/02803. That permission enabled the re-development of a former industrial site into a residential-led mixed-use brownfield redevelopment.
- 7.29 The proposal is compatible with the extant scheme as a ‘drop in’ application which can ‘slot out’ and ‘tie in’ the past-approved, and currently proposed, versions of Phases 2 and 3 respectively, without conflict with the wider site masterplan.
- 7.30 The planning policy position of the site remains broadly consistent with the 2019 scheme, including its location within an opportunity area where the optimisation of the site capacity to maximise housing supply is supported by the London Plan. The uplift of approximately one hundred units in this proposal compared to the 2019 scheme is compatible with the objectives of planning policy in delivering much needed housing (including affordable housing) to help meet identified need. In conclusion, the principle of the development is acceptable.

LAND USE

7.31 The main issues to consider in relation to land use are listed below:

(i) The acceptability of the proposed land uses: Residential (Class C3)

7.32 The NPPF and London Plan Policy GG4 supports the delivery of more homes in London and requires local authorities to ensure that more homes are delivered which meet a high standard of design and provide for specialist needs.

7.33 London Plan Policy H1 recognises the need to increase housing supply and optimise housing potential, particularly the optimisation of housing delivery on all suitable and available brownfield sites such as the former Poplar Gasworks. It also sets out the ten-year targets for net housing completions that each local planning authority should plan for. The Strategic Housing Market Assessment (SHMA) identified a need for 66,000 additional homes per year London-wide. Table 4.1 sets out the 10-year net housing completions (2019/20-2028/29) for Tower Hamlets as 34,730.

7.34 Local Plan Policy S.H1 is consistent with the London Plan. It states that the Council will secure at least 58,965 new homes across the borough (equating to at least 3,931 new homes per year) between 2016 and 2031. It states that this achieved through a comprehensive set of measures, most notably by 'focusing most new housing in the opportunity areas and site allocations', both of which apply in this instance.

7.35 Phase 2 (detailed component) of the proposal would provide 989 residential units. Phase 3 (outline component) would provide up to 945 residential units.

7.36 In line with the planning policy framework including its location within a London Plan 'opportunity area' (see principle of development above), and consistent with the site allocation which seeks a residential-led redevelopment of the site, the principle of new residential accommodation on the site is therefore supported.

(ii) The acceptability of commercial, business, service uses – (Class E)

7.37 The Phase 2 (detailed full planning permission component) would provide approximately 812 sqm of commercial, business and service (Class E) space. This would be in Block C&D, spread across three commercial units would be located at ground floor level facing onto the public park.

7.38 The Phase 3 (outline planning permission component) proposes 1x commercial, business and service (Class E) unit, between 500 sqm and 1000 sqm (GIA) in size. This would be located adjacent to the Mayer Parry bridge landing safeguarded area.

7.39 Class E comprises several sub-categories, 'a' to 'g' inclusive, specifying the parameter of uses possible. The applicant has confirmed that planning permission is sought for the commercial/business/service units under Class E parts (a) to (e), which comprises:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(c) Provision of:
 - E(c)(i) Financial services,
 - E(c)(ii) Professional services (other than health or medical services), or
 - E(c)(iii) Other appropriate services in a commercial, business or service locality
- E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)

- *E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)*

- 7.40 As set out above, the principle of the redevelopment of the site from the previous former gasworks site has been established and impended with the extant 2019 permission.
- 7.41 The Local Plan site allocation stipulates the land use requirements the site allocation. In addition to housing, it stipulates “*Employment: Provision of new employment floorspace through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail*”.
- 7.42 The above site allocation is not specific on Use Classes but includes uses within the proposed elements of Class E listed above.

Acceptability of each proposed Class E sub-component:

- 7.43 Class E(a): The range of class e uses proposed includes provision of retail (Class E(a)). The application site (nor indeed the wider site allocation site) does not fall within a designated centre within the town centre hierarchy as set out in the Local Plan. Local Policy D.TC3 of the local Plan requires new retail development outside of the boroughs Major, District, and Neighbourhood Centres to be subject to:
- a) a sequential test, and,
 - b) an impact assessment where individual units or extensions exceed 200 square metres gross floorspace (some units in this proposal exceed this).
- 7.44 Class E(b): The proposal includes provision for Class E(b) which covers ‘sale of food and drink for consumption (mostly) on the premises’. This includes cafes and restaurants.
- 7.45 Local Plan Policy D.TC5 states that cafes and restaurants will only be supported outside of the town centre hierarchy as in the case here, provided they support surrounding uses and would not undermine the function of nearby town centres, or form part of a concentration of uses that would cumulatively cause harm to the viability of the borough’s town centres. Neither would be the case here given the standalone nature of the site, the limit potential number of such premises.
- 7.46 Class E(C): The proposed land-use includes Class E(c) which has three subsets;
- E(c)(i) Financial services,
 - E(c)(ii) Professional services (other than health or medical services), or
 - E(c)(iii) Other appropriate services in a commercial, business or service locality
- 7.47 In terms of Class E(C)(i-iii) above, Plan Policy D.TC4 is relevant. It states that outside of the borough’s Major, District or Neighbourhood Centres, financial and professional services uses will be supported where they are local in scale.
- 7.48 Class E(D) & Class E (E): Policy D.CF3 of the Local Plan concerns ‘new and enhanced community facilities’. It states that proposals involving the provision of community facilities located outside the borough’s town centres will be permitted where an up-to-date and robust local need can be demonstrated. Policy S.SG1 of the Local Plan sets out strategic objectives for new development in the borough. Of key relevance here is point 7(b) which expects new development in this area to support the delivery of significant new infrastructure to support growth, including social infrastructure, such as health centres and leisure facilities.

Class E(a)-(e): policy assessment:

- 7.49 The site allocation establishes that new employment floorspace will be supported on this site, through a range of floor space sizes which support small-to-medium enterprises, creative industries and retail. The above policy framework broadly outlines the Local Plan direction for Class(a)-(e) uses, supporting their provision in line with the town centre hierarchy for Class E subsets (a)-(c), and there a needs case is made (subsets (d)-(e)). The hierarchy exists to guide development patterns in a way which strengthens and supports the viability and health of *existing* town and smaller commercial centres (district and neighbourhood centres), rather than haphazard development which could undermine them.
- 7.50 It is important to note that in this instance neither the application site (nor indeed the wider site allocation site/2019 scheme) falls within a designated centre within the town centre hierarchy as set out in the Local Plan. Specifically in relation to Policy D.TC3 (Class E(a) retail), in addition to falling outside of the above designations (where it seeks sequential test), the proposal includes commercial units (i.e. which could be used for retail) larger than 200 sqm. However, the land use requirements for the Local Plan site allocation includes retail under 'employment' use. Policy has therefore already established a principle of the provision of retail floorspace as part of this development and the proposed provision is therefore acceptable without a sequential test.
- 7.51 This Class E(a) retail support is bolstered at regional level under London Plan (Policy E9). It lends support for retail outside of designated centres in development proposals where an area is "under-served in local convenience shopping and related services and support[s] additional facilities to serve existing or new residential communities" (Part C) in line with the town centre hierarchy and sequential tests. Part 7 supports development proposals which "manage clusters of retail and associated uses having regard toc) place-making". In effect, the policy recognises that developing new residential areas in London will sometimes require new retail and associated non-residential uses outside of existing designed town/neighbourhood/district centres.
- 7.52 At national policy level, the NPPF (para.90) states that Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre (the case here) nor in accordance with an up-to-date plan. It states that main town centre uses should be located in town centres, rather than in '*edge of centre*' locations', and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. The NPPF defines 'edge of centre' locations (pg.70) for retail purposes as "a location that is well connected to, and up to 300m from the primary shopping area".
- 7.53 The application site lies within another application site (the wider 2019 extant permission scheme covering the entire site allocation area). This proposal would be built-out as part of a wider comprehensive site which could cover the entire site allocation, with Phase 1 of the wider site nearing completion at the time of this application. Taken as a whole, the wider site (the site allocating) lies approximately 230m from the boundary of the Aberfeldy Street 'Neighbourhood Centre', which is the nearest designated centre in the Local Plan. The 'front' (Leven Road) part of the overall wider site allocation therefore at least lies within an 'edge of centre' location.
- 7.54 It is important to note that the proposed retail and commercial provision forms part of a wider strategic development (both within this application and as part of the wider

2019 entire site allocation scheme) that seeks to deliver a large quantum of residential floorspace. Rather than a stand-alone retail/leisure provision, the non-residential components of the scheme are expected to have a specific function related to the development, i.e. mainly serving those residents from the development itself.

- 7.55 Officers expect (and encourage from a wider placemaking perspective) that the retail/commercial uses across the site would be used more widely than from people originating within this specific Phase 2 and 3 application site. This application site sits near existing residential properties within the wider application site (the 2019 scheme covering the entire site allocation), many of which are already constructed (Phase 1) with more to follow. It would therefore serve residents in the wider site-allocation /2019 scheme site, as well as existing neighbourhoods beyond (Aberfeldy). Furthermore, Officers consider the Class E units would also 'draw' people from the wider site/local area into the site due to the provision of a riverside walk and public park within the wider-site redevelopment (which the Phase 2 commercial units would face onto).
- 7.56 Officers therefore do not consider the Class E(a)-(c) units inappropriate given the placemaking and strategic nature of this development and its interaction with its surroundings, which the town centre hierarchy in the Local Plan is not up to date in reflecting as the site builds out. The provision would be modest in the context of the overall development and wider site-allocation development, carpetable of serving local need.
- 7.57 The 'need' case made above is also applicable to the Class E(d) and (e) uses, where the size of the proposal/wider site redevelopment works makes a robust case for the need for capacity and adaptability to provide for facilities to serve the new and existing/wider local community in terms of potential indoor sport/recreation/fitness or medical/health services.

Employment use:

- 7.58 Not all uses possible under Class E(a-e) are directly addressed by policy, and in this respect, the provision of the 'employment use' element of the site allocation is also relevant.
- 7.59 The Class E uses proposed (above) would generate employment. Local Plan Policy D.EMP2 supports the provision of new employment floorspace within identified site allocations such as this. Part 4 of the policy states that within mixed-use development schemes (this proposal and the wider extant 2019 scheme), at least 10% of new employment floorspace should be provided as affordable workspace. Part 5 stipulates that new employment space must be completed to a standard which meets the needs of potential end users.
- 7.60 The support for employment uses is echoed at national level in the NPPF which lends support for employment (and retail) including within larger-scale sites (part a of paragraphs 20 and 110). At regional (London Plan) level, support for employment uses in appropriate locations is provided in policies GG5 (Growing a good economy), and SD1 (Opportunity Areas).
- 7.61 Officers highlight that this application for Phases 2 and 3 are part of the wider redevelopment of the Poplar Gasworks entire site allocation area (PA/18/02803) and as such, the non-residential aspect of this proposal needs to be considered in the context of the wider development (the 2019 scheme). Phase 1 of the wider scheme includes units less than 250sqm and 100sqm. During the consideration of that

application, it was noted that the applicant confirmed that the units within Phase 1 were designed to be flexible and adaptable to suit a wide range of occupiers and business needs, including SMEs and start-ups, in line with the above policy objectives.

- 7.62 The commercial units in Phase 2 of this proposal again include variety in their sizes, ranging between approximately 135sqm and 318sqm. Officers consider that the range of Class E range of uses proposed has the potential to provide a well-balanced mix of commercial activity across the site that could generate employment opportunities, as well as provide services and facilities for residents of the development and the wider local community.
- 7.63 In the context of the provision of maximum floorspace parameters (500-1000 sqm outline component), Officers raise no objections to principle of provision of the Class E commercial/business floorspace in one area, which has the potential to be subdivided into smaller units as required.
- 7.64 With respect to the above requirement for 10% affordable workspace, Officers note it applied to the extant 2019 permission where it secured in the Section 106 legal agreement. However, this is sought for 'direct' purpose-built 'employment space' in the form of offices to carry out operational or administrative functions, or industrial processes. Such uses now fall under Class E(G), which is *not proposed* in this application. This 10% affordable workspace requirement secured in the 2019 scheme for that workspace outside of Phases 2 and 3 would remain secured under the amended Section 106 agreement arising from this proposal.

Class E land use: conclusion:

- 7.65 The uses proposed comply with the aims of the site allocation and the range of users previously approved under the extant 2019 scheme. There are no new material planning policy considerations to reach a different view in this instance.
- 7.66 On this basis, Officers are satisfied with the proposed non-residential Class E land uses. In coming to this view, Officers have also had regard to the similar considerations in the 2019 scheme (PA/18/02803) decision, which this view is consistent with.

Land use: overall conclusion

- 7.67 In conclusion, the principle of the proposed residential and Class E (a-e) non-residential land uses is acceptable.
- 7.68 Class E provision forms part of a wider strategic development which this wider site (the entire former gasworks site) is bringing forward in line with the site allocation. This furthers the 'case' for such commercial/business/service units. The provision and use-potential of these would provide a crucial 'placemaking function' within a new neighbourhood, where the extensive development here and on the wider site would provide a customer-base to support them. Their proposed uses also allow for uses which could directly benefit future residents here, such as recreation or medical services.

HOUSING

Housing Supply

- 7.69 The 'land use' section above sets out the over-arching planning policy framework support for the supply of additional housing, noting the policy targets for additional housing.
- 7.70 The proposed development would provide 989 homes in Phase 2, and a maximum of 945 additional homes from outline phase 3 (1934 total). This provision amounts to approximately 100 more units than secured in the extant 2019 site-wide scheme which covers this site (PA/18/02803). The proposal would therefore make an important contribution towards meeting this target. The uplift in unit numbers represents a material improvement in number when compared to the existing extant 2019 permission. The contribution towards housing supply in this location carries substantial weight in favour of the proposal.

Housing Mix and Tenure

- 7.71 London Plan (2021) Policy H10 (Housing size mix) highlights that schemes should consist of a range of unit sizes. It specifies that applicants should have regard to the requirement to deliver mixed and inclusive neighbourhoods, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, the aim to optimise housing potential on sites and the need for additional family housing.
- 7.72 Local Plan Policy S.H1(2) states that development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through, amongst other things, requiring a mix of unit sizes (including larger family homes) and tenures to meet local need on all sites providing new housing.
- 7.73 The Local Plan site allocation 3.2 (Leven Road Gas Works) sets out design principles for this site which includes: "e. maximise the provision of family homes".
- 7.74 Policy D.H2 of the Local Plan sets out the locally specific targets (*based on the Council's most up to date Strategic Housing Market Assessment, 2017*) for dwelling unit mix and sizes. These targets are shown in the following table:

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

Phase 2 (full detailed component):

- 7.75 Specific details of the full range and mix of unit types proposed are provided for the Phase 2 'full detailed' component of the proposal. The mix includes 'family sized' (3 bedroom +) units. In total, 989 units are proposed as set out in the following table:

Phase 2 Proposed Housing Mix					
	Studio/1-bed	2-bed	3-bed	4-bed	Total
Market	397	302	67	0	766
Affordable Rent	53	25	103	31	212
Intermediate		11			11
Total	450	338	162	39	989

7.76 The following table summarises the proposed Phase 2 dwelling mix against the Council's target mix per unit and tenure-type set out in Policy D.H2:

Phase 2 Proposed Housing Mix by Size and Tenure					
Tenure		Studio/1-bed	2-bed	3-bed	4-bed
Market	Proposed Provision	52%	39%	9%	
	Local Plan Policy D.H2 Target	30%	50%	20%	
Affordable Rent	Proposed Provision	25%	12%	49%	15%
	Local Plan Policy D.H2 Target	25%	30%	30%	15%
Intermediate	Proposed Provision	0%	100%	0%	
	Local Plan Policy D.H2 Target	15%	40%	45%	

7.77 As evident in the above table, the proposal diverges from the planning policy targets set out in Local Plan Policy D.H2. However, in this instance Officers consider the mix to be acceptable because of the advantages provided of this mix. Specifically, there would be much more larger family homes in the affordable rented sector where the Council recognises a particular shortage, and for which larger 3-bedroom family units are often harder to secure given their cost. 49% provision is a significant gain compared to 30% required by policy. Additionally, the provision of 4-bedroom affordable rented family sized units meets the policy target.

- 7.78 While there are more 1-bedroom units than the policy target in the market tenure, given housing costs, this is considered a more realistic reflection of market demand and affordability versus 2- bedroom market units for sale. The intermediate mix is considered acceptable given the limited number of units, where a policy target mix would be hard to realistically achieve in such limited numbers.
- 7.79 Officers recognise this challenge for larger market units considering current property prices whereby larger units, peculiarly family units, are often beyond the financial reach of buyers. Officers also recognise the pressure for larger family housing units in the affordable rented sector, and the difficulty in achieving larger units in such high-cost developments. The mix is therefore acceptable.

Phase 3 (outline component):

- 7.80 This application seeks outline planning permission for Phase 3. As such, the exact the unit mix for Phase 3 is not confirmed. It would be secured in a future reserved matters application. However, an indicative unit mix is provided, for approximately 945 proposed dwellings, as follows:

	Market	Intermediate	Affordable Rent
Studios	22%	0%	0%
1-bed	29%	37%	27%
2-bed	39%	55%	23%
3-bed	10%	8%	29%
4-bed	0%	0%	21%

- 7.81 For market tenure, the proposed above unit mix percentage aligns with or has 1% variance with that of Phase 2 (discussed below). For affordable rent tenure, the figures align with 1-2% variance except for 2 bed units, where 23% provision is proposed, greater than the 12% in Phase 2.
- 7.82 For intermediate tenure, the indicative mix shows 55% 2-bed provision (above 40% policy target) and below 100% proposed in phase 2, 37% 1-bed (above 15% policy target) compared to 0% proposed in Phase 2, and 8% 3-bed (below 45% policy target) compared to 0% in Phase 2 is proposed.
- 7.83 In summary, the indicative mix for Phase 3 is not materially different/worse than that in full detailed proposals for Phase 2, whilst the intermediate officer is more balanced, and weighed in favour of 1 and 2 bed units, likely due to affordability considerations. The full details of Phase 2 are discussed below, followed by an assessment of the suitability of the proposed housing mix.

Unit Mix: Summary:

- 7.84 Planning policy housing targets are guidelines, not prescribed numbers. Every application is considered on its own merits, having regard to material considerations at the time, and the weight given to them.

7.85 Officers have considered the above proposals and are mindful of the wider site-wide context, market conditions, likely demand for different tenures, and the Council's desire to maximise affordable rented housing particularly with larger units. On balance, Officers consider that the proposed unit mix for Phase 2 and indicative (confirmed at future reserved matters application stage) for outline Phase 3, would provide a 'well-balanced' scheme which meets housing need, and contributes to the creation of a mixed and balanced community. As such, the proposed unit mix is acceptable and would not conflict with the above planning policy framework.

Affordable housing

7.86 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.

7.87 Policy H5 of the London Plan sets out the 'threshold approach' on residential developments to be a minimum of 35 per cent. 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, and meet other relevant policy requirements and obligations.

7.88 Schemes that follow the above approach are deemed to be eligible for the 'Fast Track' route and are expected to be subject to an early viability review. However, this is normally only triggered if an agreed level of implementation is not achieved within two years of planning permission being granted. If planning permission is granted, the S106 legal agreement will secure the delivery of the affordable housing and the requirement for an early-stage review to be triggered if an agreed level of progress on implementation is not made within 2 years of the planning permission being granted.

7.89 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 housing 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 grant to increase the level of affordable housing.

7.90 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.

7.91 In the Local Plan, Policy S.H1 requires development to contribute towards the creation of mixed and balanced communities by requiring a mix of rented and intermediate affordable tenures. Local Plan Policy D.H2 is also relevant. It provides further guidance on requiring developments to maximise the provision of affordable housing in accordance with a 70% rented and 30% intermediate tenure split.

7.92 Together, the proposals for Phase 2 (full detailed planning permission) and 3 (outline planning permission) would provide 34% (by habitable room) affordable housing. However, this is a 'drop in' application designed to 'slot into' the 2019 planning

permission PA/18/02803 which has 4x residential phases covering the 'wider site'. When this proposal is incorporated the overall affordable provision for the 'wider site' including approved Phases 1 and 4, would be 35%. This provision is based on a tenure split 70:30 affordable rent: intermediate, consistent with the 2019 permission and local planning policy requirements. The affordable housing delivery percentages (by habitable room) for the wider site phased re-development, under this proposal's version of Phases 2 and 3, is indicated in the following table:

Affordable Housing Delivery By Habitable Room				
	% per phase	Tenure split % Affordable Rent/Intermediate	Cumulative %	Cumulative % tenure split Affordable Rent/Intermediate
Phase 1	39	66/34	39	66/34
Phase 2	35	96/4	36	84/16
Phase 3	32	47/53	35	70/30
Phase 4	35	70/30	35	70/30

- 7.93 Phase 2 would provide 35% affordable housing, split 96:4 in favour of affordable rent:intermediate. The indicative mix for Phase 3 would provide 32% affordable housing, split 70:30 affordable rent:intermediate.
- 7.94 Approved Phase 1 which is nearing completion provides 39% affordable housing, split 66:34 affordable rent:intermediate, and the cumulative amount at the completion of Phase 1 and 2 will be 36%, split 84:16 affordable rent:intermediate. The indicative cumulative amount on completion of Phase 3 will be 35%, split 70:30 affordable rent:intermediate. Therefore, the proposal complies with London Plan policy H4 and as such has followed the fast- track route, which does not require the scheme to be viability tested.
- 7.95 Officers seek to highlight that at no point in the delivery of the development would the cumulative percentage of affordable housing be below 35%, safeguarding affordable housing provision in the interim as the wider site builds-out.
- 7.96 In Phase 2 (detailed component), the proposed affordable provision would be within Buildings A and B. Doing so within a dedicated part of the site would enable a significant quantity of affordable rent homes to come forward at an early stage of the wider site delivery. This is consistent with the 2019 permission. This early delivery is a public benefit which weights in favour of this proposal in the planning balance.
- 7.97 In line with Policies S.H1 and D.H2 of the Local Plan the Affordable Rented units would be split 50:50 between London Affordable Rent and Tower Hamlets Living Rent. The Applicant has not provided a detailed breakdown of this. However, if planning permission is granted this will be secured via the S106 legal agreement to ensure an equal distribution between London Affordable Rent and Tower Hamlets Living Rent both in terms of distribution across unit numbers and occupancy levels.

- 7.98 The Intermediate housing would consist of Shared Ownership homes whereby, typically, a tenant can purchase an initial equity share of a property of between 25% to 75%. The rent payable on the percentage of equity not owned would typically range between 0.5% - 2.75% plus service charges, with the maximum rent limit set at 3% of the value of the equity not purchased. The combination of mortgage, rent and service charge forms the purchaser's housing costs. The affordability of the intermediate units (shared ownership) is proposed to be determined by reference to Mayoral income caps.
- 7.99 In conclusion, the affordable housing provision is welcomed and supported by Officers and the proposal is therefore considered to provide a policy-compliant level of affordable housing contributing to the borough's much needed affordable housing stock consistent with the requirements of the Local Plan, London Plan, and NPPF.

Quality of accommodation

- 7.100 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This incorporates the Nationally Described Space Standards (NDSS). 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.
- 7.101 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.
- 7.102 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.
- 7.103 In addition, London Plan Housing SPG reiterates the above standards and states that a maximum of eight dwellings per each core on each floor.

Housing Standards

- 7.104 All the homes will be designed to meet or exceed the London Plan/NDSS/Mayor's Housing Design SPD space standards in terms of Gross Internal Area, room sizes (including bedrooms), provision of direct private amenity space in the form of balconies/terraces, minimum internal storage, floor-to-ceiling heights, and layout. The proposal complies with the above planning policy framework in this regard.

Layout and Circulation

- 7.105 Complementing London Plan Policies D5 and D6, Design Standard B2.5 of the Mayor of London's Housing Design Guide 2023 is relevant. It states that the number of homes accessed by a core should not exceed eight per floor. Deviation (by exception) from this standard will need to be justified and mitigated by increasing the corridor widths to 1800mm, locating homes on both sides of the core and introducing intermediate doors to create sub-clusters.
- 7.106 Each building across the typical lower and upper floors would have a core at the centre of the 'slip block' building type with two stairs including a general access stair and a

firefighting stair to provide two means of escape. Each core would be connected to two corridors, allowing the average units per core to be halved. Most of the proposed development would have eight units per core per floor. However, not all would meet this design guide standard where more than eight units per core would sometimes exist.

- 7.107 Officers note that current fire safety requirements for two staircases per core makes adhering to the above design standard more difficult. Officers also note that the unit mix helps to mitigate the number of units per floor because smaller units are placed in larger cores, achieving similar occupancy levels to smaller cores with larger units. Finally, the building design, arranging each core with two corridors, reduces the provision of long, singular hallways. Smaller corridors create a sense of modest and defined spaces, improving the overall residential environment. Therefore, Officers consider the number of units per core acceptable.

Aspect and Outlook

- 7.108 Policy D6 (Part C) of the London Plan states housing developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.
- 7.109 The London Plan Guidance: Housing Design Standards (June 2023) introduced 'stricter' definition of dual aspect from what was previously considered dual aspect in the 2019 planning permission (PA/18/02803).
- 7.110 The new guidance is clear that where dwellings have opening windows on two adjacent sides, these can only be defined as dual aspect if the window opening/s are situated at least halfway down the depth of the dwelling. Where an aspect is facing a neighbouring wall, this aspect can only be considered as a dual aspect if the separation distance between this aspect and a neighbouring wall is the same or greater than the distance from the outer corner of the wall to the inner most edge of the window.
- 7.111 60% of the units would be dual aspect under the most recent (above) revised definition. 35% would be single aspect. 5% would be single single-aspect north-facing units.
- 7.112 The number of single-aspect units is compliant with the design code/specification of the original outline planning permission for this part of the existing wider-site planning permission (PA/18/02803). Officers accept that for a scheme of this size, density, and housing quantum, some units would be single aspect which is preferable to omitting units entirely or reducing the available unit mix and other aspects of the scheme which positively contribute to the mix and quality of development as a whole. In addition, those units, including the north-facing units, would nonetheless still benefit from good quality outlook over private communal areas, 'activated space' within the site, or the riverside/park. Furthermore, they would have external private balconies/terraces. As such, on balance their aspect and outlook would be acceptable.
- 7.113 Furthermore, based on the most recent 2023 guidance, not all of the previously graded 'dual aspect' homes in Phase 1 of the 2019 scheme would fall under that definition anymore, meaning the targets for such provision in the design code/specification of the 2019 scheme would be unlikely to be achieved under current guidance. Mindful of this stricter new standard, the extent of dual-aspect provision is acceptable.

Privacy and sense of enclosure:

- 7.114 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.
- 7.115 The layout of the proposals seeks to incorporate adequate separation distances between buildings and units to avoid direct lines of sight. Strategic placement and design of windows also help prevent direct visibility into neighbouring units.
- 7.116 The building type in this proposal are called 'slip blocks' where the non-residential ground floor elements have a podium amenity/landscaped scale on top, from which two separate buildings emerge upwards at either end. Each of the two buildings are staggered. As seen in the submitted site plans, Phase 2 (detailed component) proposes an 'arc' of 3x building groups from the south-east to north-west of the application site, comprising blocks A&B, C&D, and E&F respectively. The blocks are staggered apart from each other to maintain adequate separation distances to maintain adequate privacy and a sense of 'openness' for and between future occupiers. The distances between the closest points of these building groups is approximately 10.7-11.9m (between block D&E and E&F) and 36m at widest. Most distances between blocks are 18m or greater.
- 7.117 While parts of the distance between parts of building C (block C&D) and building E (block E&F) is below the 18m recommended by policy, this is guidance and needs to applied flexibility to higher density developments, which will inevitably be the case in an Opportunity Area. Furthermore, at these closest points, the building groups are angled and staggered from the adjacent group, so that units would not be directly opposite each other. This is a compromise required to fulfil the objective of achieving a suitable housing density whilst also maintaining other design aspirations and housing standard expectations, and on balance, given the predominant extent of separation distances and visas/openness afforded by the scheme design, is considered acceptable in the context of a high-density development and site constraints.
- 7.118 Officers highlight that the proposal layout has advantages compared to 'courtyard building' type used in the previous 2019 scheme (PA/18/02803) in terms of the level of privacy and enclosure (as well as aspect, outlook, and light) experienced by residents within. Specifically, unlike the previous scheme, by staggering the two protruding buildings from each podium into 'slip blocks', they help maintain privacy by offsetting windows and reducing direct lines of sight between units. This is particularly advantageous in higher-density developments, which are those sought by the London Plan for Opportunity Areas such as this. In terms of enclosure, the slip blocks are oriented to provide a wider range of views for more units when compared to the 2019 scheme, offering residents better visual access to the surrounding environment, such as parks or water features.
- 7.119 This design also maintains adequate openness (avoiding a detrimental sense of enclosure) and privacy for residents of units of each of the two buildings emerging from each grouped block which extends above the podium ameinty/landscape space joining them at ground and first floor level. A typical distance between the two buildings protruding above the podium of each grouped block is approximately 16m-19m at the narrow part and 20m-37m at the wider part. The distance between the narrowest parts

of buildings C&D, and E&F reduces to 14m and 10m respectfully, but as with the above example, this is at a 'pinch point' where the buildings 'pull away' to a greater separation distance in either direction from there. As such, as perceived by occupiers, most of their outlook would be to a greater distance. Overall, for a dense urban scheme, and given the slip block layout advantages for the new homes, the separation distances are considered acceptable.

- 7.120 The lowest level of units would be on the podium level and whilst their amenity space and windows would face this communal area, they would have an external amenity area facing onto it to act as a buffer. Given this landscaped area beyond is not a public street and would be limited in users to those of the building, and the units facing it would feature 'defensible space' in the form of the external terrace facing it (landscaping details of which would be secured by condition), the privacy afforded to occupiers at podium level is acceptable, and they would not feature a detrimental sense of enclosure. The units would be high quality and proportional to its highly urban context in this respect.
- 7.121 Beyond the Phase 2 proposals, the distance between the units in the blocks and indicative future Phase 3 buildings to the north would be between approximately 20m and 36m, with the public realm landscaping area in between. This distance is acceptable to maintain privacy and avoid a harmful sense of enclosure for future occupiers. While this distance would narrow to approximately 16m at a corner of building E, this is due to the layout of Phase 3 and Building E, where the corner of building E faces a corner of Phase 3. As the distance between them would significantly increase either side of the building corners, the impacts would not be harmful. To the east/south-east, the units on the side of Building A and Outline Phase 3 opposite would be approximately 18m apart, which is acceptable.
- 7.122 To the south, the units on Leven Walk would have sufficient privacy, outlook, and avoid overlooking for their context. As two storey townhouses facing a public street, the level of privacy/outlook/overlooking would be typically lower and akin to a typical terraced house. For the reasons set out in the neighbouring amenity section of this report, there would be a setback of the future Phase 4 proposals under the 2019 consent which would further mitigate these impacts to an acceptable level.
- 7.123 In conclusion, the building typology and layout, and the staggered layout of the Phase 2 buildings, represent a considered design approach which maximises the level of privacy and outlook afforded to future residents whilst maintaining the housing numbers and density sought in the proposal and opportunity area site.

Daylight, Sunlight & Overshadowing

Policy context:

- 7.124 At national policy level, the NPPF is relevant. In respect of daylight and sunlight, stresses the need to make optimal use of sites and to take a flexible approach to daylight and sunlight guidance. It discusses how to achieve appropriate development densities to make efficient use of use and states (Para 125, c) *when considering [- applications for housing, [local planning] authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards.*

7.125 *Policy D6 of the London Plan concerns housing quality and standards and in particular, part D notes that “the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing maximising the usability of outside amenity space.” The Housing SPG confirms the flexibility that should be applied in the interpretation of the BRE guidelines having regard to the “need to optimise capacity; and scope for the character and form of an area to change over time.”*

7.126 Local Plan Policy D.DH8 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’.

BRE guidance

7.127 This BRE handbook containing the most recent BRE guidance replaces the previous BRE primary method of assessment of new build accommodation through calculating the average daylight factor (ADF) and No Sky Line (NSL). The BRE guidance sets out the methods for assessing daylight within a proposed building based on methods detailed in BS EN 17037: 2018 “Daylight in buildings” which was based on the relevant European Standard but, included a ‘National Annex’ clarifying the proposed application of the new internal guidance within the UK, as well as the CIBSE publication LG 10 ‘Daylighting – a guide for designers (2014)’.

7.128 BS EN 17307 suggests two possible methodologies for appraising daylight in habitable rooms in dwellings:

- (i) Illuminance Method/Target Illuminance Method (TI)
- (ii) Daylight Factor Method (DF) 7.103

7.129 (i): The illuminance method involves using climatic data for the location of the site to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at a minimum hourly interval for a typical year. The UK National Annex provides minimum illuminance recommendations for daylight provision within UK dwellings as follows: 100 lux for bedrooms, 150 lux for living rooms and 200 lux for kitchens. These recommendations are based upon the median illuminances that should be achieved over at least 50% of the assessment grid for at least 50% of the daylight hours over the course of the calendar year.

7.130 The BRE guidance specifies, however, that where a room has a shared use, the highest target should apply. For example, in a bed-sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities may use discretion; for example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design

7.131 (ii) The Daylight Factor Method involves calculating daylight factors at each calculation point on the assessment grid. The daylight factor assessment uses an overcast sky model rather than climate-based data and does not take account of the potential for sunlight or the orientation of a particular room. The BRE guidelines provide equivalent daylight factor values to the lux values set out earlier for different locations with the ratio expressed as a percentage as follows: 0.7% for bedrooms, 1.1% for living rooms and 1.4% for kitchens. These percentages are based upon the median daylight factors that should be achieved over at least 50% of the assessment grid.

7.132 With regards to the assessment of sunlight, the BRE guidance requires that the minimum duration of sunlight exposure in internal spaces should be to receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st February and 21st March with cloudless conditions. The BRE guidance recommends that the test date should be 21st March and that at least one habitable room, preferably a main living room, should achieve at least the minimum criterion. The criterion applies to rooms of all orientations, although the guidance notes that if a room faces significantly north of due east or west, it is unlikely to be met. 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 a habitable room, preferably a living room, can receive a total of at least 1.5 hours of sunlight on 21st March.

7.133 The planning application has been accompanied by two reports prepared by 'eb7' in October 23 which consider the impacts on the future occupiers/development, and the existing neighbouring occupiers/surroundings:

1. Internal Daylight & Sunlight Report (including overshadowing assessment). This assesses levels provided for the new units. As the Phase 3 blocks have been submitted in outline, a façade assessment has been undertaken in the absence of detailed facades and layouts of Phase 3. Additionally, an assessment of the internal overshadowing levels. This document is a standalone report (plus appendices).
2. External Daylight & Sunlight Report (including overshadowing assessment). This assesses impacts on neighbouring occupiers and is discussed later in the 'amenity' section of this report.

Assessment of Daylight Against BRE Guidance

7.134 In calculating the daylight availability to the proposed habitable rooms, the following values were applied

- Glazing transmittance: 0.68.
- Window area measured from 3D model.
- Window framing factor, to account for the proportion of frame to glazing, quantified this by measuring areas for windows across the proposed development and taking the average, which equates to 0.76.
- Maintenance factor (effects of dirt on glass): 0.92 (i.e. 8% loss) for both vertical windows with no overhand, and those sheltered from the rain.
- Reflectance of room finishes: Internal Ceilings (0.80), Internal Walls (0.80), Internal Floors (0.4). Exterior walls and obstructions for red brick(0.2), yellow brick (0.3), and white/light grey brick(0.4), Exterior ground (0.2)

Daylight within the proposed Phase 2 dwellings

7.135 The daylight assessment for the proposed Phase 2 dwellings at the Leven Road Gasworks development evaluates daylight and sunlight exposure within the residential units. The adjacent Phase 3 development is submitted in outline phase only, limiting the ability to assess its impacts on daylight provision to the Phase 2 dwellings under the standard methodology. Therefore, the study used two scenarios to measure impacts arising from Outline Phase 2 to gauge potential light impacts, following updated BRE (2022) and BS EN17037 standards; i) 'maximum extent' massing option and ii) 'illustrative' massing option.

7.136 i)The 'maximum extent' massing option: This considers the Phase 3 impacts on the basis of the maximum extent of massing for Phase 3 based on the information in this application (parameter plans and design code). However, accounting for impacts

under this option was considered to present 'a significantly larger and unrealistic massing form, compared to what would likely be built' due to the fact the outline plans proposed a 2.5m-3m defensible space buffer at ground level in front of them.

7.137 ii) The 'illustrative' massing option: To account for the unrealistic impacts arising from the maximum extent option this, the BRE report also assessed the light within the Phase 2 units, with the adjacent illustrative massing option for Phase 3 in place, as the BRE authorise consider this presents a more 'real world' indication of light levels within Phase 2.

7.138 Finally, both scenarios also consider the maximum extent massing for Phase 4 (outline permission permitted in the wider 2019 site-wide scheme). This is to present the worst-case scenario taking account of the impacts of the forthcoming future phase which would be nearby the proposal (Phase 1 which is almost complete is separated/set back from the proposal the parkland phase between them). The findings of the assessment are categorised as follows:

7.139 1. *Overall Compliance:*

- With the maximum extent massing for Phase 3, 58% of the assessed habitable rooms within Phase 2 achieved the daylight 'illuminance' (the measure used to test) targets.
- This compliance improves to 60% when Phase 3 is evaluated using the illustrative massing, which more accurately reflects likely construction outcomes.
- As the site is subject to a former site-wide planning permission (PA/18/02803 – the 2019 scheme), an Average Daylight Factor (ADF) assessment was undertaken, using the previous BRE methodology in place back then. The current methodology used is harder to achieve a comparatively high score than the ADF. This testing shows that with the maximum extent Phase 3 in place under the 2019 permission, 2203 (81%) out of the 2713 rooms assessed within Phase 2 would show compliance. Again, this improves to 2264 (83%) out of the 2713 rooms within Phase 2 achieving compliance with the illustrative Phase 3 massing in place. This is broadly in line with the overall compliance of the existing Phase 1 massing, which presented 90% ADF compliance.

7.140 2. *Room-Specific Compliance:*

- Living/Kitchen/Dining Areas: Approximately 46% to 48% of these multi-use spaces met the daylight targets. However, the lower compliance rates are largely due to the depth of these spaces, which include extensive dining and kitchen areas, reducing the light reaching the room's rear.
- Studios: Compliance for studio rooms stands at 28% with the maximum massing, improving slightly to 30% under the illustrative massing.
- Living Rooms: A high compliance rate was observed, with 84% meeting targets under maximum extent massing and 92% with illustrative massing.
- Bedrooms: Compliance for bedrooms ranged between 68% and 70%.

7.141 3. *Key Factors Impacting Daylight:*

- The assessment noted that rooms beneath or behind balconies generally had lower daylight levels due to the obstructions. While these balconies reduce daylight penetration, they are integral to providing private outdoor space, which enhances the overall amenity of each unit.
- Deeper room layouts, especially for living/kitchen/dining spaces, contribute to lower daylight levels at the room's interior, though areas closer to the windows receive ample daylight.

- Separate kitchens presented lower daylight compliance but were positioned to prioritize living room daylight, as kitchens can effectively rely on artificial lighting without compromising overall residential quality.

Daylight provision to Phase 2: conclusion

7.142 Officers consider that the Phase 2 daylight assessment (under either methodology) demonstrates that despite some variations, the overall daylight provision within Phase 2 dwellings is balanced, considering the urban design constraints and the trade-offs between external and internal amenities. It would achieve an acceptable level of daylight for its context, with room-specific adjustments that prioritise daylight for primary living spaces.

Sunlight within the proposed Phase 2 dwellings

7.143 The BRE assessment evaluated compliance with recommended sunlight levels. As with the daylight assessment, its calculations were based under both scenarios (maximum extent massing option and illustrative massing option) of measuring how the buildings in future (outline) Phase 3 would affect sunlight provision. The results reflect the impacts arising from the layout, obstructions, and site design on sunlight accessibility in the Phase 2 units.

7.144 The analysis uses the 2022 BRE guidelines, specifically the ‘Sunlight Exposure Test’, which sets a target of 1.5 hours of direct sunlight on March 21st for living rooms or the primary habitable room in each unit. For each room, sunlight levels were assessed with a detailed 3D computer model of Phase 2 alongside the two ‘maximum extent’ and ‘illustrative’ massing configurations of Phase 3. These configurations present a “worst-case” scenario for sunlight provision (maximum extent) and a more realistic scenario (‘illustrative’).

7.145 The assessment considers room orientation, structural factors, and additional sunlight obstructions due to external features such as balconies. Balconies, though beneficial for outdoor space, are significant in reducing sunlight access to adjoining rooms. Results were calculated for individual rooms and summarised in terms of the percentage of Phase 2 units which complied with the assessment, as set out below:

7.146 *‘Maximum Extent’ Phase 3 Massing:*

- Compliance Level: 47% of Phase 2 units achieved compliance with the 1.5-hour sunlight target in at least one habitable room. 44% of main living spaces complied.
- The report highlights that the lower compliance in this scenario stems from substantial shadowing due to the greater massing of Phase 3. Units positioned on the northern side of Phase 2, as well as those with balcony obstructions, are the most affected. This arises from the dense form of development / site constraints.

7.147 *‘Illustrative’ Phase 3 Massing (more realistic assessment scenario):*

- Compliance Level: 48% of Phase 2 units and 44% of main living rooms meet the sunlight target.
- This scenario reflects a more realistic design assumption for Phase 3, where additional sunlight reaches Phase 2 units. However, it demonstrate that obstructions due to balconies and massing still create limitations for north-facing and lower-level rooms in Phase 2.

Sunlight provision to Phase 2: conclusion:

7.148 The Phase 2 units demonstrate 'moderate compliance' (as categorised by the Daylight/Sunlight report authors) with BRE sunlight guidance under both scenarios. The more realistic 'illustrative' massing scenario demonstrates slightly better sunlight access. Site-specific constraints, such as urban density, balcony structures, and unit orientation significantly impact the sunlight provision. Officers acknowledge that the density is a result of a planning policy direction to optimise the site capacity in this location, while balconies are a planning policy requirement so their potential loss would need to outweigh their benefits, which is not considered to arise given their various benefits. The unit orientations vary within the blocks with units facing all aspects, whilst the location/siting of the blocks themselves are severely limited by the site space/capacity. Although complete compliance is challenging, the report considers the levels achieved "reasonable for an urban development of this scale and dense urban context, balancing outdoor amenities with internal sunlight needs.

Daylight and sunlight potential within outline Phase 3

7.149 In addition to undertaking an analysis of the Phase detailed planning element of the proposals, the daylight/sunlight report also carried out a study of the indicative daylight / sunlight levels within the maximum extent massing (i.e. worst-case scenario) for the Phase 3 building blocks. Because of the limited amount of information available in the Outline Planning stage, the assessment is provided in the form of 'facade studies' which map the potential light levels available. The studies are located in Appendix 3 of the report.

7.150 For daylight, the tool considered appropriate for this test is the 'Vertical Sky Component' (VSC). The daylight results are summarised in the table below:

	% of Façade Area Tested
Proposed VSC $\geq 27\%$	44.6%
Proposed VSC $< 27\%$ & $\geq 15\%$	27.3%
Proposed VSC $< 15\%$ & $\geq 5\%$	24.4%
Proposed VSC $< 5\%$	3.7%

Table 1 - Daylight results for maximum parameter outline Phase 3 element of Proposed Development (VSC)

7.151 The facade maps indicate that a substantial portion of the outline element's facade would achieve VSC levels over 27% (considered excellent) or between 15% and 27% (reasonable for this scheme type). Lower VSC levels generally occur at lower levels or areas shaded by nearby blocks, which is typical in dense developments.

7.152 The report highlights the potential for strategic design adjustments, such as placing bedrooms in shaded zones, and optimising window sizes and balcony placement, Outline Phase 3 should be feasible to meet BRE daylight standards. As Phase 3 is in outline phase only in this application, limited to the design code/parameter plans, such design details and adjustments would be made before/when future 'reserved matters' are considered. In this context, the potential daylight availability within the scheme is good.

7.153 For sunlight, the facade maps at Appendix 3 illustrate that the vast majority of the south-facing elevations within the outline element would have good sunlight availability. In coming to this view, it notes that the vast majority of the facades would receive at least 25% annual probably sunlight hours and at least 5% during the winter months, which is considered 'good'.

7.154 In conclusion the daylight and sunlight potential within outline Phase 3 is considered acceptable, ranging between reasonable, good, and excellent, with the potential for the detailed design in future reserved matters applications to achieve a suitable standard of provision.

Sunlight within the proposed external amenity areas

7.155 The sunlight assessment for the proposed amenity spaces in Phases 2 and 3 evaluated ground, rooftop, and podium spaces for compliance with BRE guidance. Results for the 'maximum extent' (worst-case) massing show that 13 of 22 spaces meet the requirement of two hours of sunlight on March 21, covering at least 50% of each area.

7.156 The remaining spaces are heavily obstructed by the 'maximum extent' massing for Phase 3, which sits to the east and southeast of a number of the amenity spaces. When considering all amenity spaces within Phases 2 and 3 as a whole, the maximum parameter assessment shows that 43% of the total amenity space assessed would achieve the recommended 2 hours of sunlight on March 21st.

7.157 However, using a more realistic 'illustrative' massing, 14 of 22 areas meet the sunlight requirement, and all 12 blocks in Phases 2 and 3 have at least one compliant rooftop or podium space. The overall compliance rises to 48%, and if adjacent parks from the extant wider 2019 development already underway (Phase 1/adjacent park), it increases to 72%.

7.158 Analyses for later dates, such as March 22 and March 31, indicate rapid improvement in sunlight coverage. By March 31, sunlight levels are much higher, showing that while some minor deviations exist, the spaces will receive ample sunlight during spring and summer. Officers are mindful of the time of year when daylight/sunlight/shadowing of external amenity areas is most sensitive, typically in late spring and warmer months with longer daylight, where people use the spaces at their greatest intensity. At this time of year where the amenity spaces have most value, daylight/sunlight/shadowing to external amenity areas is considered very good and acceptable.

7.159 Conclusion: Daylight, sunlight and overshadowing

- For Phase 2, despite some variations in results, the overall daylight and sunlight provision is well-balanced, considering the urban design constraints and the trade-offs between external and internal amenities. It would achieve an acceptable level of daylight for its context, with room-specific adjustments that prioritise daylight for primary living spaces. It would have reasonable sunlight provision.
- For Outline Phase 3, the daylight and sunlight potential within outline Phase 3 is considered acceptable, ranging between reasonable, good, and excellent, with potential for the final details secured in future reserved matters application(s) to secure this.
- For external amenity areas, while some deviations occur, sunlight and overshadowing levels will be ample during spring and summer when outdoor

spaces are most used. The sunlight provision during high-use seasons would be high quality and effective.

- On balance, considering the above, Officers consider the proposal satisfies the planning policy framework and is acceptable in this regard.

Fire Safety

- 7.160 Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement.
- 7.161 Policy D5(B5) of the London Plan states that new development should be designed to incorporate safe and dignified emergency evacuation for all building users. Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement and detail how the development proposal will function in terms criteria set out under Part B of this policy.
- 7.162 The Mayor of London Housing Design Standards London Plan Guidance (LPG) (June 2023) contains a number of standards in relation to fire safety including that it is ensured that every apartment building has a safe and convenient means of escape and associated evacuation strategy for all building users (Standard B5.1) and requiring that developments meet the latest fire safety requirements introduced in Amendments to Approved Document B: Fire Safety relating to the Building Regulations 2010 (March 2024), including those for a second staircase on buildings that have a top storey of 18m or more in height, but 30m where in London.
- 7.163 An Outline Fire Strategy alongside a Gateway One Fire Statement are submitted as part of the planning application, prepared by Introba Consulting. These documents assess the fire safety measures required and provided within the detailed proposals for Phase 2 only. Fire safety for Phase 3 will be considered at future Reserved Matters application(s) stage.
- 7.164 The proposed development incorporates two stair cores on all levels, improving fire safety beyond the initial design and preventing reduction in housing delivery space. Buildings A to E include two lifts per core, and Building F has three, with designated firefighting lifts, all sized for 13 persons, surpassing minimum accessibility requirements.
- 7.165 Guided by fire safety regulations (Approved Document B), the design includes a stay-put policy for residential units, where the fire service manages evacuations, while other spaces use simultaneous evacuation. Each unit would have an automatic alarm, and corridors are equipped with smoke clearance systems. Duplex apartments would feature escape options, and all floors are separated into compartments, separated by fire doors. Sprinklers would cover residential, shared, and commercial spaces. Firefighting and evacuation shafts with wet rising mains are also included, with inlets for wet risers on building façades close to entry points within accessible distances for emergency vehicles.
- 7.166 Overall, the above measures are considered by Officers to represent a high-quality, sufficiently detailed, proportionate, and satisfactory response to the requirements of the above planning policy framework in this regard.

- 7.167 The submitted documentation, including details of the above measures, was reviewed by the HSE (Health and Safety Executive) who are the statutory consultee for fire safety matters. They raise no objection to the Phase 2 proposals, noting they are satisfied with the fire safety design measures to the extent that they satisfy planning application considerations and requirements.
- 7.168 The HSE highlight that there is insufficient information to comment on the outline application. For this reason, they request conditions to require they are consulted at the reserved matters application stage, and to require the submission of a satisfactory fire statement with any reserved matters application. These conditions have been added.
- 7.169 Similarly, the scheme has progressed through the GLA Stage 1 process, including a GLA review of the submitted Fire Strategy and documentation to verify the accreditation of the assessor, where no objection remains. Overall, subject to the HSE conditions above, the proposal is therefore considered acceptable and to satisfy planning policy requirements in this regard.

Wheelchair accessible housing

- 7.170 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.
- 7.171 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.
- 7.172 No details are provided at this application stage for the accessible housing mix in Phase 3 because of the outline nature of the application covering that phase. Those details would be assessed and secured at a future reserved matters application stage.
- 7.173 For Phase 2, 90% of dwellings would be designed to meet Building Regulation M4(2) standard, and 99 out of 989 (10%) would be designed to meet building regulation M4(3) standard. This meets the policy target.
- 7.174 This 10% figure includes 25x wheelchair adapted homes within the affordable rent tenure. In accordance with Policy D.H3, these should specifically meet the requirements of M4(3)(2)(b), i.e., built to fully accessible standards and capable for immediate occupation rather than adaptable for wheelchair users.
- 7.175 Officers also highlight that of the 10% M4(3) provision, the affordable rented element is for 'family-sized' units comprising 3x 2-bedroom 4-person and 22x 3-bedroom 5-person homes. This reflects the Council's desire to address the severity of affordable housing for larger families in the accessible category as well as general access/M4(2) housing, ensuring larger families with accessibility needs have adequate provision in the affordable rented element of the proposals. All units would be 'tenure blind'.
- 7.176 Based on the above, the scheme is acceptable in this regard. Full details of compliant accessible and adaptable layouts including the provision of the 25x fully adapted (M4(3)(2)(b)) units in the Affordable Rented tenure would be secured via condition and the S106 legal agreement as appropriate, should planning permission be granted.

Communal amenity area

- 7.177 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.
- 7.178 The above formula would apply to the Phase 2 detailed component proposals only because the Phase 3 outline component details would be secured at future reserved matters application stage. Based on the above formula, for 989 units, the Phase 2 proposals require 1029m² (50 + 979) of communal amenity space. This proposal complies with, and marginally exceeds this requirement by providing 1096 m² of resident's external communal amenity space. This is provided in the following forms:
- 7.179 (i) Podium-Level Communal Spaces: Each building would have podium-level areas which provide residents with shared outdoor spaces. These include landscaped spaces with seating areas and recreational spaces designed for socialising and relaxation. Details would be secured as appropriate by condition(s). The daylight/sunlight/overshadowing assessment demonstrates that their sunlight provision would be acceptable, especially in late Spring/Summer when most in-demand. Overall, this approach is considered good quality design because it forms a defensible space, away from the 'street', with good levels of natural surveillance, light, and usability.
- 7.180 (ii) Rooftop Gardens and Living Roofs: Several buildings would incorporate rooftop gardens, which would serve as communal green spaces for residents. These areas would be landscaped with trees, shrubs, and plants to create a green environment, contributing to both aesthetics and biodiversity. Again, landscaping details would be secured by condition(s) as appropriate. For the same reasons as above, this is considered a good quality design approach.
- 7.181 (iii) Green Link and Riverside Walk: A landscaped path called the Green Link runs through the wider 2019 site-wide masterplan development underway (PA/18/02803), connecting different blocks and open spaces. The Green Link continues into and through these Phase 2 proposals, as seen on the plans in the 'proposals' section of this report. As a supplementary communal amenity spaces to the more 'dedicated' podium and roof-top provision, this is considered good quality. It allows for enjoyable well-landscaped space to penetrate the site layout and would be well-used by residents and visitors passing through the development.
- 7.182 (iv) The same is applicable to the 'riverside walk' along the River Lea. Most of the riverside walk in the current application is applicable to the outline Phase 3 component where such details would be secured at future reserved matters stage, and do not count in the quantum of communal amenity space cited above. However, a small portion is sited within the Phase 2 proposals, which forms part of the overall general communal amenity space at the far north/north-west of Phase 2. This space, as part of the riverside walk, would provide residents with a scenic walking route that integrates with the surrounding public realm.
- 7.183 (v) Open Space and Public Realm Improvements: The communal amenity spaces extend to landscaped public areas that encourage social interaction and active lifestyles, with various pathways, seating, and green areas accessible to residents and the public. As part of a high-quality landscaping approach, such spaces are pivotal in the 'placemaking' approach of the scheme, and would provide a high quality 'finish' to

the overall site in terms of their landscaping and amenity function for users, and are therefore acceptable.

7.184 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.

Children’s play space

7.185 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. Areas of play should provide a stimulating environment, be accessible in a safe manner from the street by children and young people, form an integral part of the surrounding neighbourhood, incorporate trees and/or other forms of greenery, be overlooked to enable passive surveillance and not be segregated by tenure.

7.186 The GLA’s Play and Recreation Supplementary Planning Guidance (2012) provides detailed guidance to assist in this process. It advises 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.

7.187 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 rather than the GLA calculator because the Tower Hamlets version uses more precise local/ up to date census data.

7.188 The following tables provides the 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:

Number of UNITS

	1 bed	2 bed	3 bed	4+ bed	Total
Market / Intermediate	397	313	67	0	777
Social	53	25	103	31	212
Total	450	338	170	31	989

CHILD YIELDS:

Aged 0-4	167
Aged 5-11	142
Aged 12-18	149
TOTAL	458

7.189 Based on the above, the following: play space requirements are required:

PLAY SPACE REQUIRED:

1,672	sq m for 0-4 year olds
1,419	sq m for 5-11 year olds
1,491	sq m for 12-18 year olds
4,581	total sq m for all children

7.190 The proposed play space provision, quantified per age group, is as follows:

- 1681 sqm – 0-4 year olds

- 1427 sqm – 5-11 year olds
- 1509 sqm – 12-18 year olds
- 4617 sqm – total for all children

7.191 The proposed play space provision therefore satisfies, and marginally exceeds, planning policy requirements. In terms of quality and allocation, the play spaces are integrated within the landscape design of Phase 2, providing significant hard and soft landscaping features that include living roofs, trees, shrubs, playground areas, and a mix of shared and private amenity spaces. The overall landscaping strategy aims to provide engaging outdoor environments that encourage various types of play and activity across different age ranges.

7.192 The applicant’s Design and Access statement (DAS) explains that the aim of the play approach is to establish a child-friendly neighbourhood that enhances the experiences of all visitors and residents. To achieve this the play spaces have been designed around four key principles:

1. Access and Engagement with Nature:
2. Connectivity between Spaces:
3. Inclusivity:
4. Activity Variety and a choice of different types of spaces to use

7.193 Figure 18 below visually illustrates the distribution of play spaces throughout the Phase 2 detailed component:

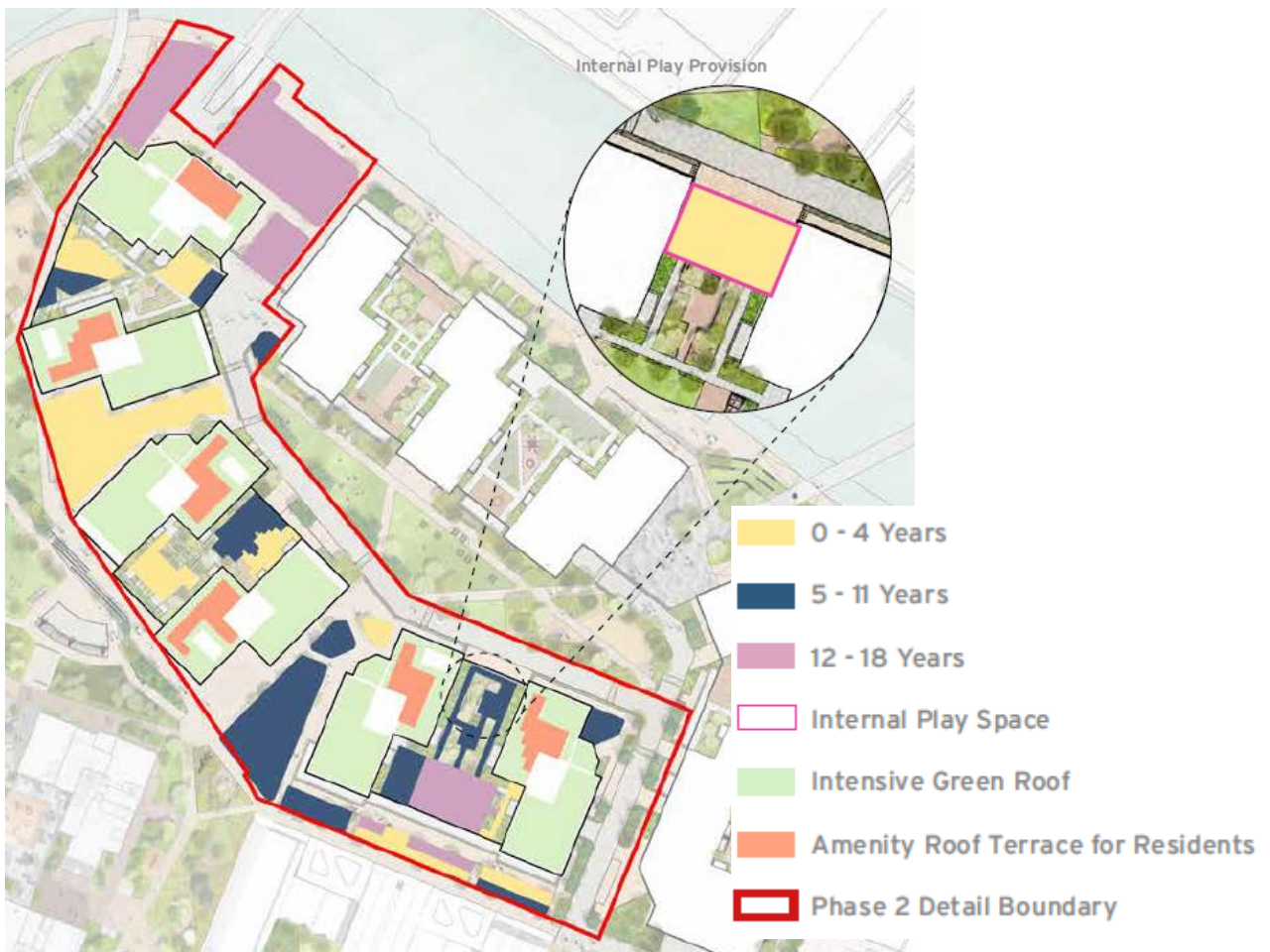


Figure 18 (above): play space distribution

7.194 Pages 133-135 of the DAS visually outline and provide commentary on the play provision for each specific age group, summarised as follows:

- 7.195 Age 0-4: The play would be located between blocks D and E, connecting Leven Central with Poplar Riverside Park. This space would include timber seating for parents and carers, offering a relaxing environment. Its proximity to commercial areas and entrances to blocks D and E would provide passive surveillance, enhancing safety. 'Child-friendly' plants will be used. The pathways will allow for scooter riding and imaginative play, encouraging a variety of activities for young children.
- 7.196 Age 5-11: The 5-11 play space would extend the green link from Phase 1, making it part of a larger play landscape tailored for children ages 5-11. It would focus on immersive, nature-based play, featuring a 'Scandinavian plank' path that would lead children through various play zones, habitats, and natural features. This area would include fallen logs, glacial stepping stones, a pond, and open lawn areas with seating. The interconnected, car-free paths would also create ideal play loops for children on scooters and bicycles.
- 7.197 Age 12-18: The 12-18 play space would be situated near the safeguarded area for a potential future 'Poplar Reach' bridge landing, offering ample room for space-intensive activities. In recognition that this age group prefers areas with some privacy, this location would balance seclusion with passive surveillance to create a welcoming play environment. It would provide a range of activities and exercise options, as well as spots for relaxation and socialising.
- 7.198 Officers consider the play space strategy to be comprehensive, well-considered, well-integrated, and high-quality. It will rely on suitable high-quality landscaping, which will be secured by condition. The overall approach is well-reasoned and the provision benefits from multiple integrated options, with appropriate passive surveillance, which is a welcome approach in contrast to 'leftover' play space designed as an afterthought. Overall, Officers are confident the play space is not only high-quality but would actively contribute towards placemaking and the formation of a balanced community in this area and is acceptable in accordance with planning policy.

DESIGN AND HERITAGE

Introduction and context:

- 7.199 The Full component of the proposed development (Phase 2) has been designed in detail. Officers have assessed this element of the proposal accordingly.
- 7.200 The Outline component of the development is supported by the parameter plans and Development Specification/Design Code which identifies maximum building footprints and heights, non-residential ground floor building uses (Class E), proposed site levels, and the proposed access and movement routes. This element is also therefore considered accordingly.
- 7.201 It should also be noted that the applicant undertook extensive pre-application discussions with the Council and continued to work positively with Officers throughout the planning application process. Officers also note the design changes in this proposal compared to Phases 2 and 3 of the extant 2019 scheme implemented. These changes are limited to confirm owing to the outline nature of the existing 2019 permission for Phases 2 and 3, but are summarised as follows:
- Increased heights
 - Increase in housing numbers (up to 100x further units)
 - Revised building design with increased heights

- A more informal 'organic' style of building and site layout
- Revised access and open spaces arrangements
- Reduced Car Parking (omitting basement parking), retaining accessible parking provision.
- Environmental and Open Space Enhancements: the revised design places greater priority on high-quality open spaces, play areas and enhanced landscaping aligned with the riverside character. This represents an improvement in public and private outdoor amenity provision.

Urban Design: Planning Policy Context:

National Policy:

7.202 The NPPF requires the creation of high quality, beautiful and sustainable buildings and places which optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development, whilst being sympathetic to local character and history. The NPPF states that LPAs should ensure that they have access to and make appropriate use of tools and processes for assessing and improving the design of development. This includes having regard to the outcomes from these processes, including any recommendations made by design review panels.

Regional (London Plan) Policy:

7.203 Chapter 3 of the London Plan contains the suite of policies that are intended to promote good design of buildings and surrounding spaces. Policies D1-D9 of the London Plan collectively emphasise the expectation for high-quality design in all developments.

7.204 Specifically, Policy D1, Part B(3) of the London Plan requires Boroughs to advocate the design-led approach by establishing acceptable building heights, scale, massing and indicative layouts for allocated sites and, where appropriate, the amount of floorspace that should be provided for different land uses.

7.205 Policy D3, Part A states that the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Part D(1) of the policy goes on to require that in relation to form and layout, development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, having regard to existing and emerging street hierarchy, building types, forms and proportions. Policy D3 sets out the requirement for a design-led approach through consideration of the form and layout, experience and quality and character of development proposals. This design-led approach replaces earlier London Plan prescriptive requirements site density.

7.206 Policy D4 is concerned with delivering good design and sets out requirements relating to design analysis, development certainty and design scrutiny (which includes making use of design review, with referrable proposals having undergone at least one design review early on in their preparation before a planning application is made) and maintaining design quality.

7.207 Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design.

7.208 Policy D8 relates to public realm. It encourages new public realm in appropriate locations and sets out various requirements which aim to ensure that new public realm is well designed and fit for its intended function(s).

7.209 Policy D9 sets out impacts that tall building proposals should address. These include visual impacts (long, mid and immediate views), consideration of spatial hierarchy, architectural quality, avoiding harm to heritage assets and their setting, glare, light pollution, access, servicing, economic impact, wind, daylight, sunlight, noise and cumulative impacts.

Local Policy:

7.210 Local Plan Policy S.DH1 of the Local Plan echoes strategic objectives and requires developments to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales. To this end, amongst other things, development must be of an appropriate scale, height, mass, bulk and form in its site and context.

7.211 Policy D.DH2 of the Local Plan requires developments to contribute to improving and enhancing connectivity, permeability and legibility across the borough.

7.212 Policy D.DH4 of the Local Plan requires developments to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted.

7.213 Policy D.DH6 of the Local Plan considers building heights and tall buildings to ensure that proposals for tall buildings are located in accordance with a spatial hierarchy and satisfy a range of criteria. Proposals which include tall buildings, but which are not located in Tall Building Zones are expected to comply with the exception criteria set out in Policy D.DH6. In summary, the exception criteria are that proposals must: 1. Be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas. 2. Address deficiencies in the provision of strategic infrastructure. 3. Significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and 4. Not undermine the prominence and/or integrity of existing landmark buildings and tall building zones.

Local Plan Site allocation:

7.214 The site falls within a Local Plan Site Allocation, specifically 3.2 (Leven Road Gas Works) The Allocation includes several 'design principles' that development within the boundaries of the allocation will be expected to address. The principle of the development is already established as acceptable, as discussed earlier in the report, primarily because the extant 2019 scheme which this scheme would 'slot into' was considered against the same site allocation criteria when planning permission was granted and due to the similarities in the proposals and considerations. Several of the site allocation design principles apply to the wider 'gasworks' site-wide redevelopment scheme, rather this specific part of that site. The design principles which are direct relevant to this proposal are as follows:

a. responds positively to the existing character, scale, height, massing and fine urban grain of the surrounding built environment and its riverside location. In particular, it should deliver an appropriate transition in scale, sensitive to the amenity of adjoining residential properties and buildings in close proximity. The new streets should complement the existing network and deliver active frontages.

d. step back from the River Lea to avoid excessive overshadowing and enable activation of the riverside

h. improve walking and cycling connections to, from within the site...

m. safeguard land within the site to facilitate the delivery of new crossing(s) over the River Lea...

7.215 Criteria 'a' and 'd' are considered acceptable for the reasons set out in the report below. Impacts in terms of the built presence on neighbours are considered acceptable in the ameinty section of this report. The transport-section of the proposal principally addresses the considerations of criterion 'h', although this design section does positively comment on the design merits of the site layout generally in this respect. The scheme design, such as the building and landscaping layout and access routes, has been designed to include the continued safeguarding of multiple bridge landing points, which would be secured by legal agreement. This addresses criterion 'm'.

Design review

7.216 The proposals have been through extensive pre-application discussions with Officer advice issued broadly supporting the proposals. In line with the NPPF and London Plan Policy D4, during the pre-application phase, the applicant (twice) presented their proposal to the Council's Quality Review Panel (QRP). The design review meetings focused on evaluating and refining the proposed development design. The first QRP meeting was 25 April 2022, where the panel's views are summarised as:

- The Panel were keen to understand and ensure the quality of the proposals.
- Particularly keen for the applicant to demonstrate how excellent design quality, including the materiality and character of the places created was going to be embedded in the proposals.
- Provision of this information would be critical to the delivery of a high-quality successful place.

7.217 Following the second QRP meeting, the panel concluded with the following points:

- The applicants were commended for the work undertaken between the two panel sessions with a particular focus on the landscape and play trails which the panel felt were excited to see.
- The panel had concerns about the developing architecture and that the character of the buildings was too generic, pastiche and slightly trite. The panel asked the applicants to spend more time exploring the architectural qualities of the buildings that they are creating. All in all, they felt more work was needed to create buildings that are more contextual.
- The panel refused to comment on height at this time until all the details of the buildings, the ground floor treatments etc were clearer.
- The panel also felt there was a need for more play.

7.218 Following the QRP meetings, the design was further revised to result in the current proposals. Further detail on the architectural detailing, particular at lower/street level, was provided, as set out in the Design and Access Statement and plans/elevations for this proposal. The play areas were further developed, and extensively detailed as set out in the Design and Access Statement and described in this report.

7.219 The evaluation below sets out why the design of the proposal is considered acceptable, including the architectural quality and details (detailed design and materials) and height. The provision of play space is discussed earlier in this report and found acceptable). The proposal therefore satisfies and accords with the QRP final position.

Townscape (including masterplan and site layout), massing, heights

- 7.220 The proposal is limited to Phases 2 and 3 of the wider 2019 scheme which is subject to a site-wide planning permission and masterplan and is an extant permission under implementation at present. As such, it must be considered in the context of this decision and overall scheme.
- 7.221 Under this proposal for Phases 2 and 3, the building footprints have been reduced, which facilitated the creation of more public realm/play space/landscaping, in particular a large central open space (Leven Central) and the area around the future Mayer Parry bridge landing, integrating the two future bridge landing points into the scheme design. The 'trade-off' is that this proposal features increased heights in these two phases.
- 7.222 In terms of heights, this proposal seeks taller buildings of greater scale than the 2019 scheme, where the buildings were generally smaller with less bulk, and had a maximum height of 76m AOD. The building heights Phase 2 of the proposal would range between 43-99m AOD. In outline Phase 3, notwithstanding their 15m tall podium links, they range between 37m and a 'peak' element extending up to 99m AOD. In terms of storeys, the current Phase 2 proposals vary between 11-19 storeys in Buildings A & B, 15-22 in Buildings C & D, and 15-28 in Buildings E & F. While Phase 3 does not contain details of storeys owing to its limited outline plan stage, with a matching 99m maximum height as Phase 2, its storey limit would be like the maximum of 28 there.
- 7.223 The 2019 scheme committee report noted that the scale of that proposal broadly aligned with the surrounding area, where developments of up to 20 storeys feature. Whilst this proposal would be taller, this is not considered a detrimental further increase in terms of height, massing and townscape impact, particularly when Officers consider that the entire site (the site allocation) is large enough to form a character area in its own right as pointed out in the 2019 decision committee report.
- 7.224 In terms of the specific character and context of the Poplar Gasworks redevelopment site in its own right, the principle and baseline for a character comprising a range of tall buildings is already established by the 2019 consent. The 2019 permission was approved with this rear part of the site masterplan (Phases 2 and 3) approved to have an 'organic character'. This means a 'looser', less rigid, 'organic' character can emerge here under a design approach which seeks to respond to the surroundings of this 'blank canvas' part of the site. This stands in contrast to the 'gridded' formal form of building design, layout etc. in Phases 1 and 4 which are the 'public ally facing' elements of the wider site, facing Leven Road. Therefore, whilst this proposal differs from the Phases 2 and 3 outline permission in the 2019 scheme, there is in-principle support for a bespoke, organic character and design for these phases already, so the approach of this proposal in seeking an irregular, responsive design in this area remains acceptable.
- 7.225 In terms of the townscape impact, Officers note that this approach is supported by the Council's Urban Design Officers, who do not feel that the increases in height across the masterplan are significant enough to be considered townscape harm given the planning policy framework support (optimising housing supply and development capacity in this opportunity area/ site allocation.) Their support re-iterates that the placement of the tallest elements near the bridge crossings is an appropriate townscape strategy, where in the context of the wider Lea Valley and river edge, they would inform the emerging organic character and identity of the site.
- 7.226 Officers note that the GLA Stage 1 report raises concerns arising from the greater height and density of this version of the Phase 2 and 3 proposals. Specifically, they suggest refinements are required to ensure that the building arrangement and height

does not negatively impact on the quality of the spaces and public realm, as well as to ensure residential quality/environmental impacts are mitigated. The latter are considered acceptable as outlined in this report. In terms of the former, the daylight/sunlight/overshadowing assessment in this report outlines why the lighting to the public realm/landscaping/play spaces would be acceptable. To change the development as the GLA suggest would require a complete re-design of the proposals, and as outlined in this report as a whole, the proposals are on balance considered acceptable.

7.227 As buildings above 30 metres are proposed, the proposal meets the definition of a 'tall building' against which it must be assessed in terms of London Plan Policy D9 and Local Plan Policy D.DH6. The proposal lies outside of a tall building zone as defined in the Local Plan. Policy D9 (Part B3) states that tall buildings should only be developed in locations that are identified as suitable in development plans, and the proposal therefore fails to satisfy this. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.

7.228 However, given the extant permission for tall buildings in the 2019 scheme, the principle for tall buildings has already been established here. Moreover, whilst the proposals are taller than the 2019 version for Phases 2 and 3, the differences in impacts are considered insufficient to materially impact the merits of the proposal in respect of the criteria of Policy D9, where, on balance, the impacts of the proposal on the surroundings, immediate area, cumulative impacts, and functionality are considered acceptable. This is further supported by the submitted Townscape and Visual Impact Assessment and ES review, which conclude that impact on surrounding townscape and designated views is minimal. The TVIA asserts that the proposed buildings will create a distinct, high-quality townscape without detracting from key visual and heritage elements in the area.

7.229 Officers accept the proposal does not satisfy the criteria, or all the exception criteria (it is not located in a high PTAL area) of Local Plan D.DH6 terms of establishing the acceptability of tall buildings outside a tall building zone. However, the same reasons as above, namely the existing extant planning permission for buildings and acceptable impacts arising from the proposed tall buildings given the location in an opportunity area and the strategic nature of the site allocation where townscape and heritage harm from tall buildings would not be harmful, as well as the beneficial placemaking impacts in some respect of D.DH6's exception criteria, the tall buildings are again acceptable in this respect.

7.230 For the reasons set out above, whilst a 'greater' development in terms of built impact than its predecessor, the townscape, scale, and massing impacts of the proposal would be acceptable. This is because they align in with overall approach and considerations of the extant scheme and strategic aims of the planning policy framework, would result in a high-quality development for existing and future residents and the surrounding environment, and would not cause material harm to the surroundings or wider planning policy objectives.

Heritage: Impacts on heritage assets

7.231 The site is not within a conservation area and does not contain any listed buildings. However, this assessment considers the potential impact of the proposed development on various designated and non-designated heritage assets in the wider surrounding area. Officers have reviewed this in line with their statutory duty under the

Planning (Listed Buildings and Conservation Areas) Act 1990, giving special attention to the importance of preserving the setting of nearby listed buildings.

- 7.232 There are four grade II* listed buildings and, nine conservation areas within 1km of the Site and nine grade II listed buildings and seven non-designated heritage assets within 500m of the Site. The impacts of the proposal upon those assets, together with the effects on the UNESCO World Heritage Site, Maritime Greenwich, and impact on the wider townscape have been assessed, including the applicant's supporting documents and throughout the EIA environmental statement and EIA ES review process.
- 7.233 The submitted TVIA within Chapter 11 of the ES demonstrates that the proposal (tall buildings) will not significantly harm the any designated townscapes, landscapes, buildings, heritage assets, key views or historic skylines, including the Maritime Greenwich World Heritage Site, or any such settings.
- 7.234 In coming to this view, it is acknowledged that the ES identifies that there would be a significant effect of 'moderate adverse' effect on the grade II* listed Balfron Tower because of the construction phase. However, as it notes, this would naturally lessen over time so that it would reduce as the development nears completion, and as such, the temporary nature of the effect would therefore limit the 'overall effect' to be 'temporary moderate adverse'. The ES considers whether embedded mitigation measures would assist in mitigating residual effects. However, as these impacts would be temporary, with a neutral operational effect, they would preserve the significance of that heritage asset as required by the NPPF, and therefore no mitigation is required.
- 7.235 In terms of built heritage impact, it is expected that the completed development will have some effects by virtue of its built presence, and taller form than the 2019 scheme, but these would be minimal and is reasonable given the area's evolving character. This view is consistent with the 2019 planning permission covering the wider site. Whilst the buildings under this proposal would be taller than those permitted in Phases 2 and 3 of that permission, the difference is considered to not give rise to materially significant harmful impacts which would warrant reaching a different conclusion than in that assessment. This conclusion is also borne out in the EIA ES review process during the application determination period, where the low-level harm would be categorised as 'less than substantial' in accordance with the NPPF direction, against which the public benefits (later in this report) would outweigh the harm.
- 7.236 In line with the National Planning Policy Framework (NPPF) guidelines (paragraphs 193-196), this level of impact is considered to be "less than substantial harm," which is outweighed by the broader benefits of the scheme.
- 7.237 As such, the Proposed Development will preserve the character and appearance, and significance of the conservation areas and other heritage assets (non-designed and designated listed buildings) affected by the proposal in the wider surrounding area. It therefore satisfies the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, and relevant polices D1, D3, D9, HC2, HC3 and HC4 of the London Plan and Policies S.D.H3 and D.DH4 of the Local Plan.

Detailed design, appearance and materials

- 7.238 This section sets out an overview of the detailed assessment of Phase 2 of the proposed development. There will be some overlap with the considerations in the above section.

- 7.239 In terms of the building and paths, roads, and landscaping layout, the proposals with Phase 2 are acceptable and consistent with the organic character approach, while maintaining compatibility with the wider site masterplan.
- 7.240 The ground floor frontages are considered acceptable in terms of the extent of their activation. This view is reached firstly with regard to the extent of openings and uses there, and secondly due to the architectural treatment to assist (discussed below). In coming to this view, Officers acknowledge concerns regarding the limited extent of active frontages from the Council's Design Officer, who highlights the extent of ground floor uses given over to servicing, which could cause 'dead frontages' at ground floor level and requests revisions to the design. Officers also acknowledged similar comments from GLA.
- 7.241 In response, Officers highlight that unlike the previous scheme, this proposal has no basement level to 'store' much of the ground floor uses such as cycle stores, bin stores, service rooms, etc. Furthermore, this proposal forms part of a wider site-wide masterplan with extensive non-residential land-users throughout, and therefore must be considered in this context. Phases 2 and 3 are inherently more residential in nature except for some elements adjacent to either the public park (south-west of this proposal, featuring commercial units), or in outline Phase 3, the areas marked in the parameter plans which do indeed face the large public realm area towards the Mayer Parry bridge safeguarded landing point, in line with what the GLA requested.
- 7.242 Given the residential-led nature of the proposal, Officers are satisfied that the extent of activation is acceptable, with several Class E uses, a residents co-working space, and a variety of openings and architectural detailing (discussed below) aiding in this respect.
- 7.243 Building upon the above view, Officers consider the architectural detailing to be high quality in this scheme. The design of this proposal with double-height ground floor 'frontages' along the buildings would provide a 'street like' frontage and coherency to the pedestrian/street level user. This approach provides consistency and a joined-up approach by harmonising the frontage of the two taller parts of each building with the central podium which joins them, so that at street-level users do not perceive the development as a series of disjointed buildings but rather one of a purpose-designed, continuous (in the building groups) streetscape. This would be further articulated as such through the provision of regular openings serving building functions and/or commercial uses, aiding in the above articulation and activation of the frontages here.
- 7.244 Throughout pre-application discussions and live application determination period, the applicant worked closely with Officers to ensure the design achieves visual interest and successfully breaks down the visual bulk and articulates the frontages as much as possible. In particular, the 'dead' elements of frontage have been further articulated with detailed elevations showing a variety of materials and finishes, such as perforated metalwork and glazed doors. These would avoid a monotonous streetscape to those passing by. The nature of this part of the development is not of a busy commercial 'heavy' area but rather of a dense residential and park-land development with ancillary commercial uses. The ground floor activation and treatment reflect this.
- 7.245 Furthermore, the final elevations received on-file show and clarify the architectural features in detail, to a degree that satisfies Officers that a high-quality design finish would be achieved. The material mix and palette at the double height street level is particularly well-considered, while the variety in facing materials to the building groups adds variety, whilst still maintaining a sense of design coherency through

commonalities (prevailing brick finishes, repetition of features such as balconies and similarities in details such as openings, windows etc.)

- 7.246 Finally, the 'slip block' building typologies proposed are welcomed and supported as a demonstrable improvement over the 'courtyard building' equivalents in the extant 2019 scheme. Their details are discussed in the proposal section of this report, but in summary, this typology maximises the ground floor activation by providing cohesive frontages whilst allowing for elevated podium gardens provide views and high-quality amenities for residents, with a clear distinction between public and private (communal) spaces.
- 7.247 The buildings within Phase 2 represent a high-quality design response. As with the 2019 scheme, Officers do however seek further details of the final finish/materials, to be secured by condition, to secure this.

Public realm, connections, open space and landscaping

- 7.248 The proposed layout for Phase 2 demonstrates a well-balanced approach that aligns with the overarching masterplan while promoting an organic character that is cohesive yet varied. Key elements include large, open public spaces like Leven Central and the riverside, alongside high-quality landscaped paths such as Leven Walk and the Green Link. These spaces are purposefully designed to be both functional and inviting, offering opportunities not just for movement but also for socialising, relaxation, and play. This emphasis on multifunctional, landscape-dense design avoids a utilitarian appearance, instead achieving a high-quality, vibrant public realm.
- 7.249 The development builds upon principles established in the 2019 permission covering the wider former gasworks masterplan, enhancing connectivity between the site, the river, Aberfeldy, and surrounding areas. The wide Green Link from Phase 1 creates a central public space, while new connections to the River Lea and planned bridge landings promote accessibility and cohesion within the area. This layout integrates well with both local and broader planning policies, creating a legible, accessible network of routes and spaces that contribute to the townscape.
- 7.250 Finally, it is important to highlight as a drop-in application, the connections and landscaping/public realm remain compatible with the wider 2019 scheme masterplan. For example, the Green Link still provides a direct route to the main public park between Phases 1 and 2, the routing maintains and, in this case, improves, access routes to potential future bridge crossings, as well as the riverfront. Subject to details secured by condition, the proposal is acceptable in this regard.

Designing out crime

- 7.251 The NPPF and London Plan Policy D.ES8 seek to 'design out crime' in development. This is achieved through measures such as site layouts which enhance visibility and promote security, with developments required to incorporate principles of natural surveillance, defensible space, and secure access points. The Metropolitan Police Designing Out Crime Officer (DOCO) has commended on the proposals, following earlier pre-application discussions with the applicant which they welcomed. They raise no objection, subject to condition(s) to secure the inclusion of Secured by Design (SBD) measures throughout the proposals (buildings and landscaping etc.), prior to the first occupation of the new dwellings. This would be attached if permission is granted.

Design and heritage: conclusion

- 7.252 Having regard to the overall scheme and based on the level of detail available at this stage, Officers are satisfied that the proposed development would comply with the development plan policies and deliver high-quality design which would cause less than substantial harm to heritage assets which would be outweighed by its public benefits.

NEIGHBOURING AMEINTY

- 7.253 Development Plan policies including London Plan Policy D14 and Local Plan Policies D.SG4 and D.DH8, seek to protect neighbour amenity by safeguarding privacy, avoiding unacceptable levels of noise and ensuring acceptable daylight and sunlight conditions are retained for neighbouring occupiers.
- 7.254 The application site is situated within part of the wider former Poplar Gasworks site, which is emerging, in line with its planning permission, as a highly urbanised area containing high density, tall residential buildings, with a mix of tall, mid-rise, and lower rise housing in the wider neighbourhood.

Privacy & Outlook

Phase 2: general

- 7.255 The Phase 2 proposals lie 'within' the wider redevelopment site of the 2019 permission and as such, the proposed residential units would not lie adjacent to *any* existing neighbouring residential occupiers.

Phase 2 townhouses impact on future Phase 4:

- 7.256 Parts of Phase 2 would face/overlook the large public park (Park Phases A and B) forming part of the 2019 consent. The distances between these flats and any external balconies and flats in the Phase 1 element beyond the park, would be well in excess of the 18m sought in the supporting text of Policy D.DH8 Local Plan 2031. This distance is not a prescribed standard but is what most people would consider sufficient to maintain good levels of privacy and avoid an unreasonable level of overlooking or unacceptable increase in the sense of enclosure.
- 7.257 Parts of Phase 2 (townhouses and Buildings A & B) would face future Phase 4, an existing outline consented phase of the 2019 permission. That phase is subject to full reserved matters to understand the type of housing that would be approved, and no such application has been considered to date.
- 7.258 The townhouses would front 'Leven Walk' a pedestrian/cycle street at ground and first floor level (including balconies at first floor level). They would be sited between approximately 14m-16m from the closest 'end' of the projections off the main building footprints in Phase 4. Much of Phase 4 would be approximately 25m or further from the townhouses owing to its staggered building layout.
- 7.259 At this lower street level, and for the urban building typology of townhouses which directly front a street, privacy expectations formed from separation distances are typically lower. 18m distances are not realistically always feasible in urban developments, particularly where planning policy seeks proposals to form dense developments and optimise the capacity of a site, as is the case here. This townhouse building typology is a compromise between the directives of planning policy to locate and intensify dense forms of development here, with the aspiration to provide a mix of affordable housing in traditional housing typologies which are popular for families.

7.260 Mindful of the above, the fact the townhouses would directly front the street with users and landscaping on the street in between the townhouse and future Phase 4 units, and the fact that the detailed design of those Phase 4 units has yet to be considered and approved at future reserved matters application stage, this arrangement is considered acceptable. It would avoid unreasonable loss privacy/outlook or overlooking between the occupiers of the townhouses and units in future Phase 4.

Phase 2 Block A & B impact on future Phase 4:

7.261 The southern 'ends' of the blocks of building A&B, and its podium amenity space, would be sited above and slightly set back 'behind' the building line of the Leven Walk townhouses. For the same reasons as above, and mindful of the greater distances involved (approximately 17m-19m, whilst taller than the townhouses, they would also avoid unreasonable loss privacy/outlook or overlooking between the occupiers/users of the podium amenity space, and units in future Phase 4.

7.262 The southern end of the Outline Phase 3 block would also lie opposite residential buildings in Phase 4, the distances would be no greater than the relationship between the Phase A&B townhouses on Leven Walk and the closest element of Phase 4 opposite it. For the same reasons as in that scenario, outlined above, these impacts are considered acceptable in-principle for an urban development and context such as this. Furthermore, as both phases are subject to details to be approved in future reserved matters applications, full consideration of those impacts and appropriate design and mitigation, if necessary, would address these issues in their entirety.

Outline Phase 3

7.263 This application only seeks outline planning permission for Phase 3 and therefore there are no plans or elevations for units there. The details of Outline Phase 3 are limited to the parameter plans and development specification/design code. Its amenity impacts would be assessed at future reserved matters stage. However, the limited parameter plans allow indicative assessments to be made about its potential future relationship with neighbouring occupiers.

7.264 The eastern application site boundary of Outline Phase 3 adjoins land outside the application site/River Lea. There is an industrial estate characterised by brick industrial buildings approximately 6m in height, adjacent to the northern end of Outline Phase 3, where no overlooking between residential uses would therefore arise.

7.265 Further south along the eastern boundary, there is a residents' car park at a lower level, serving a five-storey flatted development, Oban House, which lies approximately 25m beyond. Those flats would be sufficiently distant to avoid harmful loss of privacy/outlook or overlooking between its units and future Phase 3 units.

7.266 The far south-east corner of building block E in Outline Phase 3 would extend relatively close to the rear/rear gardens of the nearest residential properties on Oban St in the grouping comprising No.57-9 Oban St. The southern corner of the future Phase 3 block would be approximately 13m from the nearest rear garden at No.57, and approximately 16m from its nearest rear window. However, at future reserved matters stage it may be likely that corner balconies/windows are not permitted for this reason, meaning its windows/balconies may in likelihood be sited further away on the south or east elevations of the future Block E to respect the privacy/outlook of No.57 and properties beyond, and avoid harmful overlooking.

7.267 As with the townhouses, with the dense nature of the development for which there is a substantial policy support, decision-makers need to consider separation distances flexibly in such instances. Given these considerations, and the fact the parameter plans also indicate that they are “outline the maximum building footprints, which includes an allowance of up to 2.5m for bolt on balconies, canopies and awnings”, which has not been accounted for in the measurements above, the impacts on No.57 Oban St and any properties beyond (further away), would in likelihood be lesser, and acceptable.

Daylight, sunlight, and overshadowing

7.268 The current guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook ‘Site layout planning for daylight and sunlight. A Guide to Good Practice (BRE Guidance)’ (2022). This replaces the previous 2011 BRE guidance which was used in the daylight/sunlight report submitted with 2019 application, and against which the 2019 application lighting impacts were considered.

Context:

7.269 Officers highlight that this application is a ‘drop in’ application seeking to replace Phases 2 and 3 of the already approved, and implemented, 2019 scheme. Phase 2 and 3 in the 2019 scheme was for approximately 100 fewer units than this proposal, and the buildings not as tall as this proposal. However, they had greater site coverage/bulk than under this proposal.

7.270 The relationship and distance of the outer ‘perimeter’ of Phases 2 and 3 with other parts of the approved site masterplan development (Phases 1 and 4), and neighbouring residential properties in the surrounding area, are materially similar.

7.271 The 2019 scheme was considered acceptable in terms of its impacts to neighbouring occupiers in terms of daylight, sunlight, and overshadowing.

Methodology:

7.272 Chapter 8 of the Environmental Statement submitted with this application includes a comprehensive ‘Daylight, Sunlight, Overshadowing and Solar Glare’ assessment (‘the report’). The report is carried out against the latest 2022 guidance above. Its methodology for assessing daylight, sunlight, overshadowing, and solar glare impacts in this report is detailed and structured, encompassing multiple stages and scenarios to evaluate potential effects on surrounding areas due to the proposed development.

7.273 In terms of the assessment scope and approach used, the report assesses both immediate and long-term impacts of the development across two primary phases (Phases 2 and 3) and under different development scenarios. These evaluations include not only the individual buildings but also consider cumulative impacts with nearby developments (and the 2019 scheme build-out), evaluating how light conditions might change for neighbouring properties and open spaces under the new site conditions.

7.274 To inform the assessment, the report uses two baseline scenarios (2018 and 2023) to understand the current daylight and sunlight levels at the site. This comparative approach allows for accurate benchmarking against the proposed development.

Baseline conditions are derived from site and surrounding area data, with analysis informed by aerial photography, planning records, and estimated configurations where direct data is not available.

7.275 Using the BRE recommended targets for daylight and sunlight levels, along with overshadowing and solar glare effects, various methodologies are used as appropriate for the scenario in question, comprising:

1. **Vertical Sky Component (VSC):** Measures the amount of skylight reaching a window to determine if the development would decrease natural light access below a certain threshold.
2. **No Sky Line (NSL):** Assesses daylight distribution within a room by analysing areas that receive direct skylight.
3. **Annual Probable Sunlight Hours (APSH):** Calculates sunlight exposure over a year, focusing on windows within 90° of south for determining sunlight loss.
4. **Overshadowing and Transient Shadowing:** Evaluates impacts on outdoor spaces by analysing shadow patterns at key dates (spring and summer solstices and equinoxes) and times of day.

7.276 The report applies the Vertical Sky Component (VSC) and No Sky Line (NSL) methods for daylight, and the Annual Probable Sunlight Hours (APSH) for sunlight, while also evaluating overshadowing through sunlight contour analysis and transient overshadowing plots across seasonal solstices. For overshadowing, a criterion of two hours of sunlight on 50% of an area on March 21st is used. It includes additional tests like "mirror baseline" and "balcony removal" to consider the realistic impact of obstructions, aiming to minimise overshadowing effects.

7.277 To gauge how significant the impacts are, the report categorises the effects/impacts arising into "negligible," "minor," "moderate," or "major" adverse impacts, based on deviations from BRE guidelines. This analysis considers both technical results and professional judgment (by the qualified authors), especially in cases where existing structural designs (e.g., balconies or recessed windows) might create self-imposed shading, which the proposed development cannot mitigate.

7.278 The report considers measures which could mitigate impacts. Several design adjustments were made to reduce adverse impacts, such as repositioning building blocks or modifying the massing and orientation to maintain acceptable light levels wherever possible. Additionally, specific mitigative measures are noted for future development stages if detailed designs change.

7.279 Figure 19 below provides a visual reference of the affected neighbours:

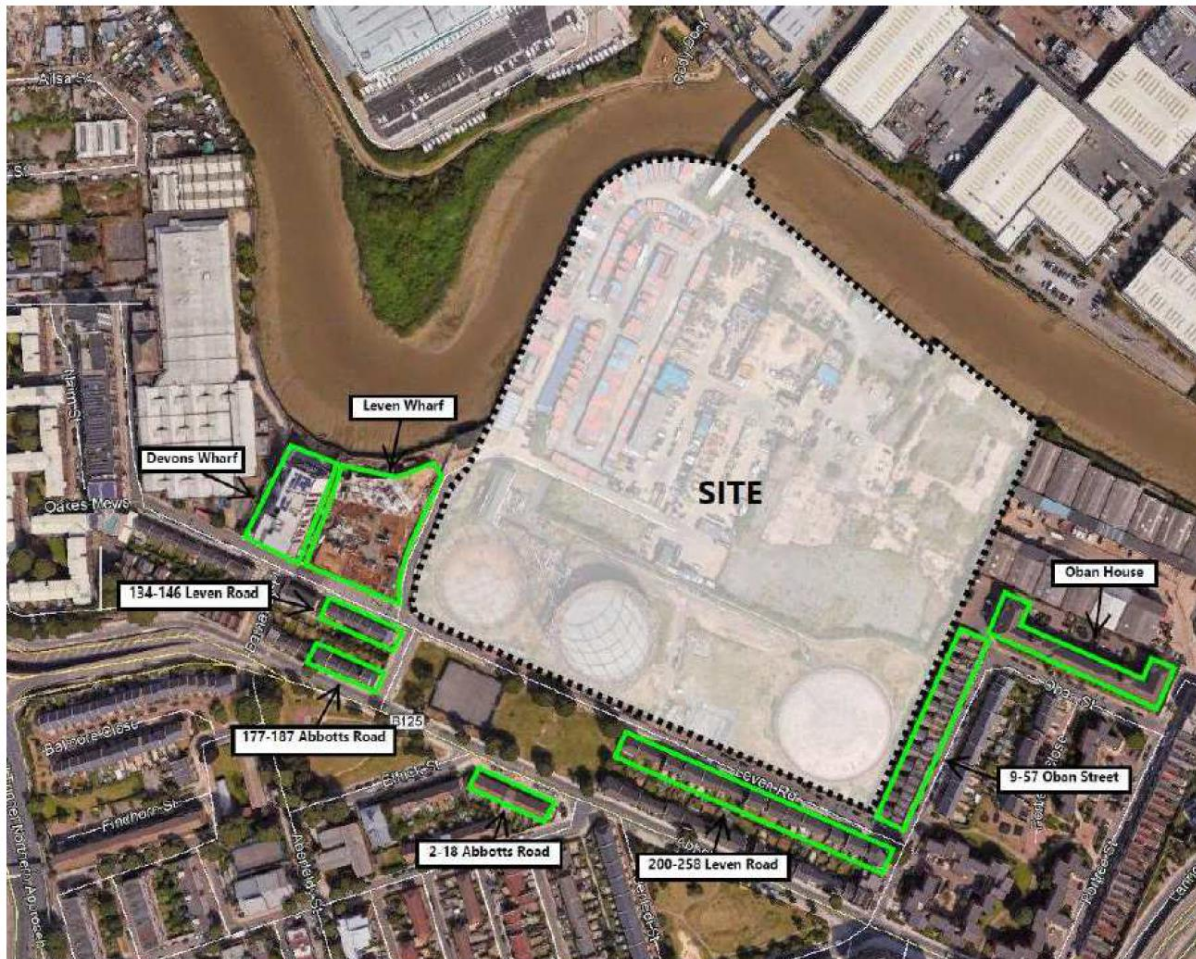


Figure 19: daylight/sunlight/shadowing: affected neighbours

Findings:

Daylight Impact

- 7.280 The proposal demonstrates a high level of compliance with VSC and NSL methods used with most neighbouring properties featuring daylight reductions which stay within acceptable limits. Most retain at least 80% of their existing daylight levels.
- 7.281 Some neighbouring properties (such as those very close to the site and especially those with windows directly facing the proposal) experience more noticeable reductions in daylight beyond the BRE threshold. These reductions range from minor to moderate adverse impacts in most cases. This is mainly due to site constraints such as recessed/obstructed layouts, and urban density, but the report mitigates these effects where possible by accounting for factors such as self-obstructing features.
- 7.282 The most significant non-compliance is seen in properties like 9-57 Oban Street and Leven Wharf, where some rooms see major reductions exceeding 40% of VSC. The report notes that in urban settings, these reductions are sometimes deemed acceptable due to high-density development standards.
- 7.283 Overall, neighbouring daylight impacts are broadly compliant with BRE recommendations, with some limited experiences of minor to moderate adverse effects.

Sunlight

- 7.284 The sunlight assessment, using the APSH method, finds most properties retain adequate sunlight levels throughout the year (at least 25% of annual probable sunlight hours and at least 5% during winter months). Neighbours with windows facing within 90 degrees of due south, which are most relevant for sunlight impact, generally see minimal reductions.
- 7.285 Several properties face sunlight reductions, particularly in winter sunlight hours due to the proximity and height of the new development. However, for these affected properties, notably those in Leven Wharf (to the west/south-west of the wider 2019 site rather than adjacent to this proposal) and Oban House, the reductions often do not fall below the BRE guideline thresholds.
- 7.286 The impact on sunlight is generally classified as minor adverse, with some moderate impacts on a limited number of windows that face the site directly. Compliance is high, with most areas adhering closely to sunlight targets and only minor adverse impacts recorded for some properties.

Overshadowing impact

- 7.287 For overshadowing, the report follows BRE guidelines by ensuring that outdoor amenity areas receive at least two hours of direct sunlight on March 21st across 50% of their area. Most surrounding neighbour's amenity spaces, including private gardens and communal areas, comply with these standards.
- 7.288 Where there are slight non-compliances, the impact is generally minor, affecting only portions of amenity areas for brief durations, primarily in winter when shadows are longest. Some areas close to the development may experience brief periods of overshadowing, especially in winter, when shadows are longest. However, these are generally for a short-duration and minor impacts that do not cause extended overshadowing of neighbouring properties or spaces. This is to be expected in urban areas.

Conclusion of current report findings:

- 7.289 There is 'substantial' compliance with BRE guidelines for sunlight, daylight, and overshadowing for neighbouring properties. Minor to moderate adverse impacts would arise in certain areas, particularly for properties close to the site (57 Oban St and properties nearby), but these are generally within acceptable urban standards and do not indicate severe non-compliance. The report uses supplementary assessments (such as transient overshadowing and adjustments for self-obstructing features) helps ensure that the proposal minimises impacts on neighbouring properties where possible. On balance, the scheme is considered acceptable.

Comparison with 2019 scheme: methodology:

- 7.290 Officers appreciate comparisons with the lighting impacts of the 2019 scheme may be sought, particularly given changes in building footprint, layout and height in this proposal.
- 7.291 The 2019 scheme used a different methodology and was considered as a 'whole' for the entire site-wide approval rather than specifically in terms of its outline phases 2 and 3. It includes VSC and NSL assessments for daylight, but the sunlight assessment lacks the APSH breakdowns into annual and winter analyses. Instead, it evaluates overshadowing using simpler static contour maps and does not include transient studies or additional balcony assessments. It assumes that any reduction to 0.8 times

the original area receiving sunlight signifies significant overshadowing, which may lack the nuanced comparisons seen in the updated methodologies in the current report.

- 7.292 The report in the current proposal offers a more comprehensive approach, applying detailed assessments aligned with the latest 2022 BRE standards, which in turn provides more granularity in evaluating sunlight and daylight impacts compared to the 2019 scheme.
- 7.293 Overall, the newer report generally shows a mitigated impact on daylight, sunlight, and overshadowing due to its more detailed and flexible methodologies, allowing it to capture realistic effects under different scenarios. Officers also acknowledge that the older report might appear to show more severe/worse impacts due to its reliance on earlier methods without adjustments for obstructions, seasonal sunlight variation, or transient shadows. Therefore, the newer report's methodology often results in a less severe assessment of impacts on neighbouring properties compared to the older report.
- 7.294 Nonetheless, for clarity, insofar as possible, Officers provide the following comparison of impacted properties between the current proposal and the 2019 scheme below.

Comparison of main results between current proposal and 2019 scheme:

OBAN HOUSE

Daylight

- 7.295 Proposal: Affected windows experience moderate adverse reductions (for around 35 windows). Some rooms have NSL impacts, but these remain within moderate levels.
- 7.296 2019 scheme: More windows and rooms exceed BRE guidelines due to a stricter interpretation, resulting in more moderate to major adverse classifications.

Sunlight

- 7.297 Proposal: Minor adverse reductions in annual sunlight; generally compliant in winter.
- 7.298 2019 scheme: Moderate impacts, especially in winter, due to less seasonal differentiation.

Overshadowing

- 7.299 Proposal: Minor transient impacts, staying mostly compliant with brief overshadowing in winter.
- 7.300 2019 scheme: Static analysis shows higher overshadowing, with fewer outdoor areas meeting the March 21st guideline.

9-57 OBAN STREET (terraced properties to South-East of Pauline Phase 3)

Daylight:

- 7.301 Proposal: Significant impacts, with approximately 31 windows experiencing major adverse VSC reductions, meaning they lose over 40% of their daylight. Minor to moderate impacts affect additional windows, largely mitigated by accounting for balconies and other design constraints.

7.302 2019 scheme: Higher overall impact: more windows at 9-57 Oban Street are classified as having major adverse impacts, as the older report does not apply flexible testing such as balcony removal. The exact number of affected windows is not provided clearly due to the mythology used.

Sunlight

7.303 Proposal: Minor adverse impact. Slight reductions in winter sunlight for a few windows.

7.304 2019 scheme: Minor adverse impact. Slight reductions in winter sunlight for a few windows.

Overshadowing

7.305 Proposal: Mostly compliant, but some outdoor spaces see brief overshadowing, generally remaining within BRE standards.

7.306 2019 scheme: The static overshadowing analysis leads to an appearance of greater overshadowing impact, with fewer periods meeting the two-hour March 21st standard.

200-258 LEVEN ROAD

Daylight

7.307 Proposal: moderate impacts affecting approximately 69 windows, with a small number experiencing major reductions.

7.308 2019 scheme: Greater adverse impacts on more windows as stricter criteria are applied without mitigating adjustments, leading to more windows classified as having major reductions.

Sunlight

7.309 Proposal: Minimal impacts, with slight non-compliance in winter for a few windows.

7.310 2019 scheme: Moderate reductions, with annual and winter sunlight impacted more noticeably.

Overshadowing

7.311 Proposal: Generally compliant with minor overshadowing effects, mainly transient in nature.

7.312 2019 scheme: Higher overshadowing impact perceived due to static analysis, with fewer areas achieving the two-hour March 21st standard.

LEVEN WHARF

Daylight

7.313 Proposal: Approximately 73 windows are affected by reductions beyond BRE thresholds, with some windows seeing moderate to major reductions in VSC and NSL. Additional testing (like balcony removal) tempers some impacts.

7.314 2019 Scheme: Higher adverse impacts recorded, with more windows exceeding major adverse thresholds due to the lack of additional mitigating assessments.

Sunlight

- 7.315 Proposal: Minor reductions in annual sunlight with some winter sunlight losses that do not exceed BRE thresholds substantially.
- 7.316 2019 scheme: Moderate adverse impacts on more windows due to the absence of seasonal differentiation.

Overshadowing

- 7.317 Proposal: Minor impacts in outdoor spaces with transient shadows during winter.
- 7.318 2019 scheme: Static overshadowing assessments result in greater perceived overshadowing on outdoor spaces, with fewer passing the two-hour March 21st standard.

Conclusion: daylight/sunlight/overshadowing:

- 7.319 The lighting impacts of the proposal have been considered. For a dense urban scheme of this type, and context, on balance the impacts are considered acceptable.
- 7.320 In terms of comparing impacts between the current proposal and the 2019 scheme, on balance, the current proposal generally performs better than 2019 scheme. However, a direct comparison of daylight/sunlight/overshadowing (including solar glare) between the two schemes must be made cautiously; the 2019 scheme report suggests worse adverse impacts on specific properties, while the report in the current application indicates lesser impacts due to the more nuanced and flexible application of BRE guidelines which have changed since the 2019 scheme report. The additional testing in the current report helps to reduce some impacts to minor or moderate levels, where the older report identifies major impacts due to the absence of these mitigating approaches.
- 7.321 Overall, impacts to neighbouring occupiers are acceptable in this regard.

Noise, Vibration, and Construction Impacts to neighbouring occupiers

- 7.322 Part E of London Plan 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. 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.
- 7.323 Policy D.DH8 of the Local Plan requires developments to not create unacceptable levels of noise pollution during the construction and life of the development. Policy D.ES9 of the Local Plan requires development to be designed in such a way to minimise noise and vibration impacts and identify mitigation measures to manage impact.
- 7.324 The proposal includes a noise assessment which has been reviewed by the Council's Environmental Health Noise Officer. Following a review of its methodology, baseline noise conditions, and technical aspects to form an understanding of noise/vibration impacts to both future occupiers and neighbouring properties, the Noise Officer no objection subject to the inclusion of conditions to manage and mitigate noise impacts.
- 7.325 These conditions would ensure the proposals are constructed to protect against harmful noise impacts, and would require a post-completion verification report, including noise test results, to demonstrate construction to the required noise

protection measures/standards. Furthermore, a 'S61 Restrictions on Demolition and Construction Activities' condition attached would control noise from demolition/construction work period too, ensuring that neighbouring residents are not unreasonably impacted.

- 7.326 The noise impacts have also been considered throughout the EIA review process and any relevant mitigation measures applicable to Phases 2 and 3 in this proposal will be secured as part of this permission. This includes a noise barrier located at the edge of the roof to reduce noise levels to existing two or three storey dwellings nearby. Subject to the above, the proposal is acceptable in this regard.

Lighting

- 7.327 As part of the previous decision, the landscaping condition required the following lighting details prior to the commencement of the landscaping work for the relevant phases: Details of lighting; including type, specification, hours of operation and lux numbers;(include demonstration of how the sensitive light strategy will avoid unacceptable lighting of the SINC). For the avoidance of doubt, Officers again recommend this is included as appropriate in the planning condition not only for the ecological/landscape/design/public realm reasoning, but also to ensure no unacceptable light spillage to neighbouring properties.

TRANSPORT

Transport and highways

- 7.328 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.
- 7.329 The submitted information relating to transport considerations and impact has been included within the Environmental Statement (see Chapter 13). A standalone Transport Assessment, and follow up Transport note, has also been submitted in support of the application.
- 7.330 The proposals have been reviewed by the Council's Transportation Officers who confirm that they have no objection. This is subject to conditions, and a S106 legal agreement to secure scheme as 'car-free' whereby residents would not be eligible to apply for a parking permit to park on LBTH public highway. They note that the applicant has engaged with the highway authority at pre-application stage and has taken on board comments, so the scheme reflects their comments and therefore requires minimal further comment or input.
- 7.331 Where specific issues are raised by the Council's Transportation Officers, or other consultees as relevant, these are discussed in the following sub-categories below.

Pedestrian and cycle access and movement

- 7.332 Pedestrian and cycle routes are proposed to be taken from the adjoining public park and other phases of the wider 2019 development. Access links would be provided through The Green Link within Phase 1, Leven Walk and 'The Avenue' within Phase 4. These would continue through the site adjoining the proposed residential buildings and onwards to Phase 3. This would allow movement toward Leven Central open space area, the River Lea, riverside walk and, if delivered, the future Mayer Parry Bridge within Phase 3.

- 7.333 The application does not seek to secure planning permission for the bridge here, or the potential bridge on the far north-west of the site at the safeguarded landing zone, as this would not be delivered by the applicant.

Vehicular access and movement

- 7.334 Vehicular access to the Site is into Phase 2 on its southern boundary, taken from The Avenue within Phase 4 of the Original Permission and on towards Leven Road. The two-way vehicular route would connect with all buildings to provide servicing access through Phase 2 up to Building F where there will be a turning point. An additional vehicular route would spur off the above Phase 2 route toward the Mayer Parry Bridge safeguarded landing area through Phase 3. The route would also provide a specific area for Environment Agency access to the river wall.

Deliveries & Servicing

- 7.335 Servicing, deliveries, refuse collection and emergency access for residential units in Buildings A-F and commercial units within Buildings C-D would take place via the vehicular route from The Avenue. This route would also serve the future development at Outline Phase 3.
- 7.336 Commercial operator servicing/deliveries would take place using the commercial street-level loading bays amongst the 32 no. short stay spaces accommodated within the landscaping at ground floor level. The submitted details have been reviewed by the Councils Transportation and Highways Officers who find them acceptable. TFL request further details to be secured by condition; a construction logistics plan and a Delivery and Servicing Management Plan (DSMP). Requirements for a Construction Logistics Plan already exist by condition and would be secured as part of the wider Construction and Environmental Management Plan condition again if planning permission is granted. A DSMP was already submitted with this application and the details were considered acceptable following review by the Council's Transportation Officers. Therefore, a condition will be included to secure adherence to the plan rather than require a new further submission.

Car Parking including accessible parking & control measures:

- 7.337 Policy compliant provision of accessible car parking would feature. Accessible parking bays would be specifically allocated to wheelchair user dwellings. These will be available only for residents within those units and are designed to meet requirements under M4(3) of the building regulations.
- 7.338 All buildings within Phase 2 would have access to parking at ground level located within the podium in each building parcel. Access to parking is via vehicular access from Leven Central. Access to the podium car park would be secured to prevent unauthorised parking. 94% of parking bays spaces provided would be accessible, with the accessible parking bays designed to meet the M4(3) criteria.
- 7.339 The parking provision type, quantum, and arrangements accords with the requirements of planning policy, notably Policies T5 and T6.1 of the London Plan and is supported by LBTH Transportation and Highways colleagues, TFL, and the GLA. The latter have requested that an update to the Car Parking Design and Management Plan will be required to be secured by condition. Officers note there is an existing condition on the 2019 permission requiring a parking space management plan outlining the required details, which will be secured on this proposal for this effect if planning permission is granted.

7.340 The reduction in on site car parking compared to the 2019 scheme, with the exception of accessible blue badge parking, is welcomed by all statutory consultees. The LBTH Transportation Officers highlight that badge parking should be provided on a needs basis regardless of tenure and should be on a leased basis and not sold. Ideally, particularly for the affordable units, there should be no charge for blue badge bays. Only residents within the phases of the development with a registered blue badge will be allowed access to the parking bays. Officers confirm, as requested, that a 'Permit Free' agreement covering all residents, would form part of the S106 agreement with this permission if granted, consistent with the 2019 scheme/permission.

Cycle Parking and Facilities

7.341 For the Phase 2 commercial operators, there would be 9 no. secure long stay cycle parking spaces within Building C/D podium.

7.342 The proposal would provide 1,662 long-stay cycle parking spaces for residents. These would be located at ground level within the podium space for each block, accessible from facades of all buildings and from within each of the building cores. 48 residents short stay cycle parking spaces are proposed. Additional provision for short stay visitor spaces located within the surrounding landscaping.

7.343 Numbers are calculated from the ranges outlined in the London Plan, with 20% allocated as Sheffield stands.

7.344 The proposal satisfies the requirements of London Plan Policy T5 across land uses. LBTH Transportation Officers support the provision, noting it would adhere to the London Cycle Design Standards. They welcome that a good percentage of the cycle stands will cater for adapted / larger bikes which will mean that the cycle provision is accessible to all potential users. They highlight that the stores have been split into small units which makes the cycle offer more attractive. They note that cycling throughout the site has been considered and is in line with the original masterplan proposals.

7.345 TFL request a further condition to require full details of long stay and short stay cycle parking and facilities. The GLA however consider that the design of the cycle parking should be improved for Blocks A/B and C/D because the majority of accesses to cycle stores in Phase 2 are accessed by a single door to the public realm, or a single door to the car parking space. The use of a single door is not considered appropriate by the GLA, given the amount of parking within stores and demand for use, size of oversized bicycles and for access into the car parking space where doors are often adjacent to disabled persons parking spaces. Block E/F for example includes more than one door or double doors to cycle parking. They state that additional doors or wider doors should be provided across all locations.

7.346 Officers suggest that the condition requiring full details of the cycle parking should require demonstration that it meets the required London Cycle Design Standards, which covers issues such as ensuring sufficient access. A condition is therefore attached to this effect. Subject to this condition, the cycle parking is acceptable.

Trip generation

7.347 A trip generation assessment for the proposal was undertaken to estimate the volume and mode of travel trips generated by the new residential and commercial units. Using data from similar nearby developments, the analysis considers a range of transport modes for travel projections, accounting for both local and regional public transport accessibility

- 7.348 Both the GLA and TFL request a condition is attached to any approval to require clarification of updated vehicular distribution onto the local and strategic highway network. They consider the proposal insufficient to demonstrate data on the likely trip generation impacts of the proposal to consider the impacts on the surrounding infrastructure.
- 7.349 However, LBTH Transportation Officers consider the proposal to provide sufficient information and clarity in this respect. They note that all servicing is to be undertaken on site via designated routes, as per the 2019 permission, which they considered acceptable and in line with the masterplan proposals.
- 7.350 Mindful of this, and the fact that the proposal was submitted with a full transport assessment, and this was screened through the EIA review process, and the limited uplift of approximately 100 additional units in this scheme compared to the extant permission, Officers consider that a further trip generation assessment/information request is unnecessary and of limited value to require to be submitted after the grant of planning permission.
- 7.351 LBTH Transport Officers note, the proposal should have little impact on the public highway (compared to what is already granted). Given the reduction in car parking numbers compared to the existing planning permission, they note that it should in fact result in fewer vehicle movements along Leven Road and turning into the site. This will contribute to an improved situation for pedestrians and cyclists.

Mitigation of transport impacts – requests for contributions

- 7.352 Since the outline permission was approved the applicant has provided a connectivity study, which was part of the planning condition/obligations. The study is accepted, by LBTH Transport Officers. The 2019 application sought a connectivity contribution to be spent on measures arising from the connectivity study, as appropriate. The 'second' contribution amount towards this is outstanding as it is linked to the implementation of Phase 2, and there would apply when Phase 2 as already approved/ or as may be approved if this permission is granted, is implemented.
- 7.353 For this application, Officers accept there would be a small increase in residents arising compared to the 2019 scheme. As such, Officers consider that the LPA should seek [further] funding for the second connectivity contribution which can go towards implementing improvements identified from the study. This amount of money to go towards transport measures/improvements should reflect the impact of the additional units (100) in this proposal compared to the 2019 scheme.
- 7.354 To this effect, Officers have suggested the S106 Legal Agreement captures a further 'proportionate' amount of this contribution, adjusted for inflation, proportionate to the increase of 100 units under this application. This would be transparent, proportionate, and reasonable, for the same reasons identifies in the 2019 scheme. Subject to this, the trip generation and associated impacts/connectivity improvement potential of the scheme is acceptable.

Funding towards Canning Town TFL interchange

- 7.355 In addition to the above connectivity contribution uplift, TFL and the GLA seek a £150,000 contribution towards Canning Town interchange. They would use this in conjunction with mitigation secured from other sites in the wider area (across boroughs), to support improvements to access within and immediately outside the Underground DLR station and bus station. Officers accept the rationale for this contribution and as it is directly linked to the impacts arising from the proposed development, whereby Canning Town would be a key public transport interchange

used by residents/visitors, the contribution is recommended to be secured by legal agreement.

Funding towards future bridge crossings

- 7.356 The Greater London Authority (GLA) and Transport for London (TfL) are requesting a contribution from the development towards the construction of future pedestrian and cycle bridges over the River Lea, as outlined in the site's connectivity plans. They consider that these bridges are essential for enhancing connectivity with Canning Town and promoting sustainable travel for future residents. TfL emphasize that achieving a "step-change" in connectivity is critical for the success of this high-density, car-free development. They consider that without these improvements, the site risks being isolated and lacking adequate transport links, which could hinder residents' ability to live car-free. The bridges are seen as vital for creating a healthy, accessible, and sustainable neighbourhood, supporting the Mayor's "Good Growth" objectives.
- 7.357 Officers are not unsympathetic to the points raised here. However, Officers must be clear that there is not a valid planning justification for seeking such monies.
- 7.358 Officers must also ensure any contribution are proportionate. In this respect, the 2019 permission for 2,800 units did not seek this contribution, which as requested at the time too. That permission is extant, and does not require such a contribution, and this application only seeks an uplift of approximately 100 units compared to it.
- 7.359 At the time of the 2019 decision, Officers undertook considerable discussions with the GLA and with TfL with regards to this request for a financial contribution towards future bridge crossing(s). The Council maintained the position that, in the context of the requirement for local connectivity improvements, a financial contribution in respect of the delivery of a River crossing was not required to make the development acceptable.
- 7.360 In any event, the CIL regulations, particularly the Council's CIL 123 list, restricted the Council from securing financial contribution towards strategic infrastructure that appears on the CIL 123 list. 'Strategic' is defined by the List as 'infrastructure that is designed to serve more than those residents or workers within one particular development by contributing to infrastructure improvements across the wider Borough'.
- 7.361 Therefore, the contribution did not meet the above CIL requirements, nor was it required to make the 2019 development acceptable. What was required, under the site allocation, was the safeguarding of the land for the future river crossings referred to above. This is again achieved in this proposal and would again be secured by legal agreement if planning permission is granted.
- 7.362 In the context of the 2019 decision, and the limitations for securing contributions and the requirements of the CIL regulations, for this scheme which is a 'minor' uplift of 100 units compared to the 2,800 permitted in the 2019 permission, Officers consider the requested contribution is not justified, and strongly recommend that it is not included if planning permission is granted.
- 7.363 For the reasons set out above, whilst Officers note the requested raised by the Lea Valley Regional Park Authority to secure CIL contributions from the developer to specifically fund the potential future bridge crossings, this would not be possible.

Travel Planning

- 7.364 The application submission was also inclusive of draft framework travel plans for the separate residential and commercial components of the development. The travel plans

would set out proposed measures to encourage sustainable travel for future occupiers/commercial operators. It is recommended that the approval and implementation of final Travel Plans for both the residential and commercial uses within each phase of the development is secured through a S106 obligation.

Impacts on London City Airport

7.365 In their consultation response, London City Airport requested a condition to outline a height limitation on buildings and structures (including temporary cranes) to address their safety requirements. The buildings proposed would not reach the relevant height but given the potential for cranes to impact their requirements, a condition is attached to ensure they are consulted on proposed cranes.

Transport and highways – conclusion:

7.366 In conclusion, Officers consider the scheme would be acceptable in terms of transport and highways impacts, subject to mitigation and management, and further details, secured by conditions and legal agreement as follows:

7.367 Legal Agreement to secure:

- Continued safeguarding of multiple bridge landing points
- Contribution towards Canning Town interchange - £150,000 payable to TfL
- Contribution towards connectivity study measures - £221,112
- Restricting on-street car parking for occupiers / employees

7.368 Conditions to secure:

- Disabled persons parking and electric vehicle car parking provision
- Delivery and Servicing Management Plan
- Car club membership for eligible occupiers
- Travel Plans

ENVIRONMENTAL IMPACTS

Energy & Environmental Sustainability

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

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

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

- 7.372 London Plan Policy SI 3 requires development within Heat Network Priority Areas to have communal-low temperature heating system, with heat source being selected in accordance with a hierarchy (connect to heat networks, use zero carbon or local heat sources (in conjunction with heat pumps, if required), use low-emission CHP).
- 7.373 London Plan Policy SI 4 calls for development to minimise overheating in accordance with a cooling hierarchy.
- 7.374 The principal target is to achieve a reduction in regulated CO₂ emissions in line with the LBTH Local Plan that requires all residential development to achieve the 'Zero Carbon' standard with a minimum 45% CO₂ emission improvement over Part L 2013 Building Regulations. This exceeds Policy 5.2 of the London Plan that requires the 'lean', 'clean' and 'green' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard targeting a minimum onsite reduction of 35%. All surplus regulated CO₂ emissions must be offset at a rate of £95 for every ton of CO₂ emitted per year over a minimum period of 30 years.
- 7.375 The application is supported by an Energy Statement and Sustainability Assessment. The energy strategy follows the London Plan's energy hierarchy: Be Lean, Be Clean, Be Green, and Be Seen, aiming to balance CO₂ emissions reduction, with the need to keep the future homes within affordability constraints and in line with building regulation and planning requirements. It demonstrates that both phases meet the updated Part L 2021, and Part O, Building Regulations.
- 7.376 Efficiency measures (Be Lean) are expected to reduce regulated CO₂ emissions by 12% across the site (13% for residential, 17% for non-residential) over the Part L 2021 baseline, in line with London Plan standards. Decentralised energy production (Be Clean) would be achieved by using a communal air source heat pump network, achieving a further 55% CO₂ reduction. Renewable energy (Be Green) includes 164.8 kWp of solar PV panels, although the impact appears lower due to the methodology used in the statement.
- 7.377 Together, these combined measures indicate a total CO₂ reduction of 65% over the Part L 2021 baseline, satisfying planning policy targets. The remaining CO₂ emissions, are proposed to be offset through a payment of £1,567,500. The carbon offset payment would be secured by the S106 legal agreement.
- 7.378 The Council's Energy Officer reviewed the proposals and confirmed they have no objection subject to securing the following by condition or legal agreement as appropriate:
- Final details of PV specification demonstrating energy generation maximised with Biosolar roofs installed where feasible.
 - The carbon savings are delivered as identified in the Energy Statement
 - Post completion report (including As Build calculations) is submitted to demonstrate energy / CO₂ savings have been delivered.
 - Carbon Offsetting contribution of £1,567,500.
- 7.379 The proposals are also subject to overview by the GLA as part of the Stage 1 process. The proposals are at an advanced stage in this process which requires back and forth dialogue and steady progress in addressing technical criteria. The GLA Officer advised it is for the LPA case officer to determine if the level of detail and progress on energy

matters is sufficient to determine the application. Officers consider that is the case given the requirements of policy have been demonstrated to be capable of being achieved, with outstanding queries primarily relating to a level of detail commensurate with the post-decision Stage 2 phase.

- 7.380 Correspondence from the GLA to Officers acknowledges that the application is now at a stage where, subject to LBTH Case Officer satisfaction, the application can proceed to the stage where it can be presented to members of the committee for a resolution non whether to grant/refuse. In such an instance, the GLA Officer correspondence, which provides a 'trail' of progress along various indicators/measures showing how the details and queries of the scheme have been 'closed off', specifies the outstanding details to be secured by planning conditions and/or legal agreement at post-decision stage. In addition to measures requested by Officers to be secured in the S106 legal agreement, Officers note the following planning conditions, as requested by the GLA, would be attached should planning permission be granted:

Pre-Occupation stage:

- 7.381 The applicant should be conditioned to submit an updated Be Lean/Be Green assessment prior to occupation showing an increased representative number of units, to demonstrate that the Be Lean/Be Green target has been met.

To be submitted at future Reserved Matters Stage (Outline Phase 3):

- 7.382 Requirement to submit the energy statements in the reserved matters application for review and approval by the borough and GLA, and to address the following:
1. Demonstrate a minimum 10% domestic Be Lean reduction in regulated CO2 emissions compared to a 2021 Building Regulations compliant development and submit detailed energy modelling outputs (DER/TER Worksheets).
 2. Submit information to demonstrate the applicant has considered and minimised the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. This should cover the parameters set out in the guidance and include a confirmation of the quality assurance mechanisms that will be considered as part of the strategy.
 3. Undertake a Dynamic Overheating Analysis to assess the overheating risk. This should follow the CIBSE TM59 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.
 4. Provide a drawing/schematic showing the route of the heat network linking all buildings/uses on the site has been provided alongside a drawing indicating the floor area, internal layout and location of the energy centres. [Context: The applicant is proposing a site-wide heat network supplied by a centralised energy centre. It should be confirmed that all apartments and non-domestic building uses will be connected to the heat network. They should maximise the heat loads that are connected to the site-wide heat network and any divergences from policy should be robustly justified.
 5. Provide a detailed roof layout demonstrating that the roof's potential for a PV installation has been maximised and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas.

The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.

7.383 Submit with an RMA application:

- a. an estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads. They should demonstrate how the heat fraction from heat pump technologies has been maximised.
- b. details of the Seasonal Coefficient of Performance (SCOP) and/or Seasonal Energy Efficiency ratio (SEER) and how these have been calculated for the specific proposed system's operation. This should incorporate the expected heat source and heat distribution temperatures (for space heat and hot water) and the distribution loss factor, which should be calculated based on the above information and used for calculation purposes.
- c. Provide the Energy Use Intensity and Space Heating Demands at the reserved matters stage. The applicant should detail the methodology used for these calculations. The applicant should report the EUI and space heating demand against the reference values in Table 4 of GLA guidance. The applicant should provide commentary if the expected performance differs from the reference values.
- d. Submit a post-construction assessment to report on the development's actual Whole Life Carbon emissions.

7.384 Having taken account of level of detail submitted, the progress in GLA discussions to-date, and the GLA position, Officers are satisfied that the proposal is acceptable in this regard. This is subject to the above measures to be secured by legal agreement and/or conditions as appropriate.

Air Quality

7.385 Policy SI1 of the London Plan requires, amongst other things, that development proposals must be at least Air Quality Neutral. At the local level, Policy D.ES2 of the Local Plan requires development to meet or exceed the 'air quality neutral' standard.

7.386 The Air Quality Assessment comprises Chapter 7 of the Environmental Statement and has considered the potential for both the construction works and the operational component of the development to result in air quality effects. The submitted details have been reviewed by the Council's Environmental Health Officers who confirm no objection subject to conditions to secure:

5. Dust management plan including PM10 continuous monitoring
6. Air quality standards for gas-fired boilers
7. Kitchen extract standards for commercial uses
8. Construction plant and machinery (all Non-Road Mobile Machinery) details
9. Requirement for an air quality neutral assessment for any emergency generators installed

Plus recommend PM10 monitoring information informative and Air emission flue informative.

7.387 The applicant responded to the suggested conditions. Their response and the Officer comment on this is outlined as follows:

1. Dust management plan including PM10 continuous monitoring – accepted.

2. Air quality standards for gas-fired boilers: The applicant suggests this condition is unnecessary because they do not propose such boilers. Officers nonetheless recommend the condition is included for the avoidance of doubt to remove the possibility of boiler installations in breach of the requested standards.
3. Kitchen extract standards for commercial uses: The proposed condition requires details to be submitted prior to occupation of the development, however some element of this conditions can only be discharged by the operator of the commercial unit based on its equipment. The applicant therefore suggests this condition is reworded to 'pre occupation of any unit with a commercial kitchen'. Officers agree.
4. Construction plant and machinery (all Non-Road Mobile Machinery) details: The suggested condition requires details of all machinery to be used during the construction period in advance. The applicant is unable to commit to this condition 'trigger' and suggests the wording is updated as follows in line with the GLA Stage 1 response dated 15 April 2024, which Officers accept:

"All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition,"

5. Requirement for an air quality neutral assessment for any emergency generators installed. Agreed by applicant.

7.388 Further to the above conditions, as part of the ES review process, in addition to 'embedded mitigation' measures, further details are required to be secured by conditions as 'additional mitigation' in order to satisfy the Final Review whereby air quality issues had been satisfactorily resolved. These mitigations are the need to secure Phase 3 and 4 emergency generators sited at roof level without a cowl, and control on the test hours of life safety generators, to operate for 15 minutes on a weekly basis and a full load test for one house annually within Phases 2 and 3, a total of 14 hours per annum. Subject to the above conditions, the proposal is acceptable in this regard.

Wind

7.389 Policies D3, D8 and D9 of the London Plan requires developments, particularly those with tall buildings, to be considerate of microclimate impacts associated with their scale and mass. Similarly, Local Plan Policies S.DH1 and D.DH6 seek to ensure that new developments do not adversely impact on the microclimate and amenity of the application site and the surrounding area. Policy D.OWS4 of the Local Plan states that development within or adjacent to the borough's water spaces is required to demonstrate that, amongst other things, it does not have an adverse impact on other existing active water uses.

7.390 Chapter 9 of the ES reports on the findings of a wind microclimate assessment, based on wind tunnel testing receptor locations within the site and surrounding area. In addition to the 'embedded mitigation' measures proposed, 'additional mitigation measures are required to make the development acceptable, primarily comprising measures such as landscaping/trees and balustrades, which are of course typical in

the design of the scheme and so not burdensome. These would be secured by planning condition. Subject to mitigation measures, the proposal is acceptable in this regard.

Flood Risk and Drainage

- 7.391 Policies SI12 and SI13 of the London Plan seek to ensure that flood risk is minimised and mitigated. Developments should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy set out within the London Plan. The policy aspirations are also reiterated at the local level in policies D.ES4 and D.ES5 which seek to reduce the risk of flooding.
- 7.392 The site falls within Flood Zone 3A and is protected to a high standard by the River Thames Tidal defences up to a 1 in 1000 (0.1%) chance in any year flood event.
- 7.393 The application follows the determination of the earlier 2019 scheme under application reference PA/18/02803. In short, that scheme was considered acceptable subject to the conditions recommended by the Environment Agency (EA) and Thames Water.
- 7.394 Amongst the conditions attached to the 2019 scheme at the requirement of the EA, was condition no.31. It required a strategy for maintaining and improving the flood defences across the site to be submitted to and approved in writing by the Local Planning Authority, in consultation with the EA.
- 7.395 At the time of submission of this planning application, the details pursuant to condition. 31 of the 2019 scheme remained unresolved, as did the applicant's approach to flood risk on this proposal, which the EA required to respond to stricter requirements which came into force since the 2019 scheme. In response to this, the applicant has been engaging with the EA throughout the application process to resolve both the requirements of condition 33 of the 2019 permission and the related outstanding issues raised by the EA relating to this application.
- 7.396 These issues have since been advanced to the satisfaction of the EA. The applicant submitted revised details. The latest revised details were re-consulted upon by the LPA, and confirmed as acceptable by the EA, who withdrew their earlier objection to this application. The EA formally support (no objection) the scheme subject to details to be secured by condition(s).
- 7.397 For the same reasons as above, the EA formally also withdrew their objection and consented to the discharge of the outstanding condition.31 of the 2019 scheme. It was discharged (approved) under application reference. PA/21/01989 in October 2024.
- 7.398 In terms of the specific reasoning for their support, the EA note latest flood modelling shows the site would be at risk if there was to be a breach in the defences or they were to be overtopped. However, they are satisfied that the developer has assessed the risk from a breach in the Thames tidal flood defences using the latest modelled tidal breach data and has not proposed any sleeping accommodation below the modelled tidal breach flood level. The proposal does not have a safe means of access and/or egress in the event of flooding from all new buildings to an area wholly outside the floodplain. However, safe refuge within the higher floors of the development has been suggested which the EA accepts.
- 7.399 The EA note that the proposed development will only meet the National Planning Policy Framework's flood risk requirements if their suggested planning conditions are

attached. These conditions require the LPA to consult the EA as part of the future approval-of-detail process, which would ensure the conditions are only discharged if competently addressed, and as summarised, cover the following:

- Implementation of the flood risk assessment.
- Implementation of the flood risk strategy.
- Submission of as-built drawings.
- A scheme for the provision and management of intertidal and aquatic habitats.
- A land contamination risk assessment, remediation strategy and verification plan and subsequent condition relating to a verification report.
- Long term contamination monitoring/maintenance and a further condition to account of any previously unidentified contamination should it arise.
- Piling/Foundation Works Risk Assessment with respect to Groundwater Resource
- Decommission of investigative boreholes.
- No drainage system for infiltration of surface water into the ground without LPA consent.
- SuDS Infiltration of surface water into ground.

7.400 The EA's suggested wording for the above conditions requires the EA to be consulted by the LPA as part of the consideration/approval of details process. This is standard practice and ensures the LPA can be confident in competently discharging the conditions in due course.

7.401 Thames Water raise no objections subject to conditions (piling method statement to be approved prior to piling works, and confirmation of competition of water network upgrades required or a development and infrastructure phasing plan to be agreed, before occupation) and informatives.

7.402 Officers are therefore content the flood risk measures have been thoroughly considered with considerable measures for future safeguarding and development of these measures secured by condition. Subject to these conditions, the proposal is therefore considered acceptable in this regard.

Health Impact Assessment

7.403 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 a HIA.

7.404 The Health Impact Assessment (HIA) for the proposed development (found in Volume 2, Chapter 15 of the Environmental Statement) evaluates potential health impacts, highlighting both positive and adverse effects.

7.405 The Environmental Statement (ES) assessed two separate development scenarios:

1. **The 'Proposed Development'** which relates to the section 73 application currently also under consideration (PA/28/02038). That application which seeks to allow this proposal (if granted) to 'slot into' the wider 2019 scheme under planning permission PA/18/02803, effectively merging the permissions. In this scenario, the ES impacts take account of this proposal in the scenario that all phases of the 2019 site-wide masterplan 'around' Phases 2 and 3 as proposed here have been included, so the impacts are taken regarding them, for example, assuming the future School phase will be delivered, and the public park adjacent to Phase 1 will be completed.
2. **The 'Phase 2 and 3' scheme, which applies to *this planning application*.** This scenario solely measures impacts arising with respect to this proposal for Phases

2 and 3 in isolation and does not assume provision of infrastructure etc. from future phases of the 2019 permission. In effect, it is a hypothetical 'worse case' scenario.

7.406 Notwithstanding some adverse impacts of the construction-phase of the development, which in any case can be mitigated and managed by planning conditions/obligations as discussed throughout this report, the assessment for Scenario 2 'Phase 2 and 3' scheme concludes that once 'operational', the proposal would have the following significant effects:

- Housing Design and Affordability – 'moderate beneficial' impact due to the provision of flexible/adaptable and energy efficient homes in a range of sizes and tenures.
- Access to Open Space and Nature – 'Minor beneficial' impact
- Air Quality, Noise and Neighbourhood Amenity – 'minor adverse' impact.
- Accessibility and Active Travel – 'moderate beneficial' impact due to the provision of walking and cycling links through the Site connecting to existing (and future safeguarded) links, accessible design, and design to reduce car dependency
- Crime Reduction and Community Safety – 'minor beneficial' impact
- Access to Healthy Food – neutral impact.
- Access to Work and Training – 'minor beneficial' impact
- Social Cohesion and Inclusive Design – 'minor beneficial' impact.
- Minimising the Use of Resources – 'moderate beneficial' impact due to the efficient use of large area of currently vacant land, and sustainable use of resources
- Climate Change – 'moderate beneficial' impact due to design avoiding risks from overheating and improves flood defences in the surrounding area.
- Access to Health and Social Care Services and Other Social Infrastructure – 'minor adverse' impact due to the increase of population in an area where GP services are already congested.
 - In this healthcare respect, Officers highlight that the proposed land uses allow for *the 'provision of medical or health services' (Class E(e))* such as GP surgeries/health centres. For the avoidance of doubt, obligating a healthcare use and occupier here is not within the control of the planning system. However, it is pertinent to note that the proposals actually allow for mitigation of this 'moderate adverse' impact through the provision of an additional medical/health service centre, which was not identified in the above assessment because the proposed class e use was not specified in the application documentation at the time it was written.

7.407 While Officers accept the ES review for HIA impacts applicable to this proposal is scenario 2 as assessed above, Officers highlight awareness of the existence, and differences arising under scenario 1. In assessing impacts under the human health category of 'Access to Health and Social Care Services and Other Social Infrastructure', scenario 2 records a 'minor adverse' impact whereas scenario 1 records a 'negligible' impact.

7.408 However, even under the applicable 'worse case' scenario 2 above, the report concludes that the positive impacts significantly outweigh the adverse ones. The adverse impacts mostly arise if Phases 2 and 3 were developed in isolation, lacking site-wide amenities like parks and schools included in the 2019 masterplan. In this respect, while this application cannot impact the 'deliverability' of the separate 2019 permission, Officers are mindful of progress in the implication of that application which is underway. Specifically, Officers acknowledge that Phase 1 is nearing build-out completion and Park Phase A has approved RMA consent and is underway. Phases 2 and 3 are intended to integrate into the larger scheme 2019 rather than exist in isolation and given the progress of the 2019 scheme in this respect, Officers give some limited material weight to this consideration.

- 7.409 The above supportive ES review of the HIA requires the inclusion of embedded mitigation measures which would be 'designed-into' the scheme, which would be secured by S106 legal agreement, and 'additional mitigation' measures such as a management plan of open space to reduce crime/fear of crime. These additional mitigation measures would be secured by planning condition(s) as set out in the recommendation at the end of this report.
- 7.410 In conclusion, under the 'worst-case' scenario, subject to mitigation measures, there is a significant net gain in positive human health impacts of this proposal. In coming to this view, Officers acknowledge the consultation response received from the Council's Public Health Officer.
- 7.411 Their comments are detailed in full in section 5 of this report. The comments raise a series of queries regarding conceptual approaches to the development, which are not necessarily able to be applied to a proposal at planning application stage, for example, by suggesting concepts which would be more applicable at early-design stage, and which raise considerations which would nonetheless need to be considered and 'designed around' as part of a final design. Officers highlight that while pre-application discussions are a useful stage to raise some queries raised, it is not possible to continually 're-design' a scheme at planning application stage, or to rigidly expect a scheme to meet specific criteria as under planning policy and constrains there are regularly 'trade offs' between competing interests, such as daylight compliance and achieving sufficient urban density.
- 7.412 The comments raise essentially query whether the proposal maximises the 'planning gain' of the proposal to ensure the quality and impacts of the proposals benefit future and existing residents, such as ensuring the best amount/quality of space, daylight, amenity space etc. As detailed throughout this report, on balance, the proposal is considered acceptable on the measures raised in their comments. Further to this, the applicant submitted a formal response to these comments (amongst others), to Officers/the applicant, and this response remains on the case file.
- 7.413 For brevity, it is not necessary to outline the comprehensive applicant response to the Public Health Officer comments beyond to say that they respond to demonstrate the merits of the scheme in relation to the queries raised by the Officer. The findings of this Officer Report are consistent with the applicant's Health Officer response, i.e. conclusion that the quality and impacts of the proposals are a net positive, and acceptable in planning terms.
- 7.414 In conclusion, the health impacts of the proposal would, on balance, be positive subject to further details to be secured by legal agreement and planning condition(s).

Waste

- 7.415 Policy D.MW3 requires all new developments to include sufficient accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole.
- 7.416 The proposed waste servicing arrangements for Phases 2 and 3 involve both temporary and permanent solutions to handle household and commercial waste. Initially, a temporary waste management solution will cover Phase 2 until Phase 3 facilities are available. This includes waste collection within each building, where waste will be transported by a concierge or estate management team to a temporary collection area near Leven Road, for weekly collection.

- 7.417 Once Phase 3 is completed, a permanent waste solution is proposed which would involve centralised skip compactors. Waste storage areas at the ground level of each building would house separate Eurobins for refuse, recyclables, and compostable waste, which would be moved to central compactors. The compactors are intended to be collected twice a week, allowing efficient waste handling across the site.
- 7.418 This arrangement has been considered and reviewed by the Council's Waste Officers, who fed into the design and arrangements of the scheme throughout the pre-application stage and support the proposals. They are therefore considered acceptable.

Land Contamination

- 7.419 The assessment of potential impacts on the ground conditions and contamination has been provided as part of Chapter 4 of the Environmental Statement. The ES review requires no further embedded or additional mitigation in this respect.
- 7.420 The details have been reviewed by the Council's contaminated land officer who raised no issues with the submitted details subject to the inclusion of a pre-commencement condition to provide further details. The condition has three components requiring:
- a) pre-development (except demolition etc.): submit and receive approval for a remediation scheme to deal with potential ground contamination which shall include including a site investigation scheme with results and detailed risk assessment, a verification plan, and a monitoring and maintenance plan.
 - b) during works: if any additional contamination is found during works, cease works in the relevant part of the site and do not resume them until either the contamination has been assessed and a remediation scheme has been submitted to and approved by the LPA, or timescales for such have been agreed by the LPA.
 - c) do not occupy the development until a post-completion verification report including sampling and monitoring results demonstrating the site remediation criteria have been met, have been submitted to and approved by the LPA
- 7.421 The above condition would ensure that the application accords with Tower Hamlets Local Plan policy D.ES8.
- 7.422 However, since the receipt of those comments, the applicant issued a response letter to outline their objection to parts a) and b) of the suggested condition. (They accept part c). Their reasoning for this is as follows:

1. Part a) of the condition is not accepted by the applicant given the proposed development is to be undertaken in line with the site-wide principles agreed within the consented site wide remediation strategy [for planning permission PA/18/02803]. [Officers note this was approved under approval of detail application references: PA/19/02845 and PA/20/01843].

The site-wide remediation in relation to controlled waters is discharged for the whole site under [previously approved '*approval of details reserved by planning condition' applications' reference:*] PA/22/01059 and PA/24/00297.

The applicant suggests a remediation strategy for the proposed development can be submitted to demonstrate compliance with the principles of the consented sitewide remediation strategy. This would include the points raised by the LBTH suggested full condition wording under sections ai.2 and ai.3. However no further site investigation is required.

2. Part b) The sitewide remediation has been completed as per the original strategy. A contingency plan and discovery strategy for unexpected contamination is included within the consented remediation strategy (section 6.8 and 6.9) and will be included in the phase 2 remediation strategy. The applicant 'cannot accept' part b as proposed.

7.423 Officers accept that the 2019 permission already required some details requested by Environmental Health Officers as that scheme covers the entire wider site, including this application site area, and is already underway. There is therefore a large element of duplication in their suggested condition. As the 2019 scheme has been implemented, and is being built-out, the scenario whereby this application must repeat all the condition requirements in case the 2019 permission was not implemented does not arise. Combined with the fact the approved details already overlap, and therefore addresses, the area covered by this application, Officers agree that it would not be necessary to re-impose a duplication of those details. Doing so would not meet the 'tests for planning conditions' because it would be unnecessary.

7.424 The applicant instead proposes that as the proposed development is to be undertaken in line with the site-wide principles agreed within the consented site wide remediation strategy, their suggested condition is 'streamlined'. An amended condition wording to require a remediation strategy for the proposed development to demonstrate compliance with the principles of the consented sitewide remediation strategy, without the need for another superfluous site investigation, and which still includes a post-completion verification report (part c), is therefore considered appropriate. The wording for this can be agreed between Officers, the applicant, and the Council's Environmental Health Officers. Subject to this condition, Officers consider the proposal would satisfy planning policy in this regard.

Ecology and Biodiversity

Policy context:

7.425 London Plan Policy G5 (Urban greening) states that major development proposals should 'contribute to the greening of London by including urban greening as a fundamental element of site and building design and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.' Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments, based on Urban Greening Factors. Higher standards of greening are expected of predominately residential developments (target score 0.4). London Plan Policy G7 (Trees and woodlands) states that existing trees of quality should be retained wherever possible or replaced where necessary.

7.426 London Plan Policy G6 states that 'development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain' and Tower Hamlets Local Plan Policy D.ES3 requires developments to protect and enhance biodiversity. Policy D.ES3 requires major development to deliver net gains in biodiversity in line with the Local Biodiversity Action Plan (LBAP). Local Plan Policy S.OWS2 is consistent with this, requiring proposals affecting water spaces (River Lea) to maximise opportunities for enhancing their ecological and biodiversity values in line with the LBAP.

7.427 Chapter 14 of the Environmental Statement assess the environmental impacts of the proposal. It does so both in terms of the impacts of the proposal on its own, and how it fits into the context of the wider consented 2019 masterplan scheme (PA/18/02803).

Planning Context and submission details:

7.428 The principle of development has already been established with the extant 2019 permission (PA/18/02803), which covers this application site and beyond (the entire masterplan site). The site is not subject to any statutory or non-statutory nature conservation or biodiversity designations. There are eight SINC present within 1km of the Site, one of which (the River Thames and Tidal Tributaries SMINC) is located immediately adjacent to the site.

Context:

7.429 When the site was previously assessed (in 2018) for planning permission PA/18/02803, it comprised of large areas of bare ground, buildings and hardstanding, and either negligible flora or flora of site-level importance. However, the range of habitats present was of borough-level importance, although considered a 'poor example' of this habitat type. The collection of bats and breeding birds at the site were of local importance. The breeding black redstart identified as likely to be present within the site were of national importance.

Environmental Statement Review and Findings:

7.430 The Council responded to a request for a Scoping Report with its Scoping Opinion(SO) issued on 13/06/23, outlining the proposed scope and methodology of the topics for assessment within the EIA to be submitted with this application. Chapter 14 of the Environmental Statement (ES) assesses the ecological and biodiversity impacts of the proposal in line with the contents requested by the Council in its Scoping Opinion.

7.431 The SO comments are described in full in table 14.3 of Chapter 14 of the ES. They include the need for an ecology assessment to be scoped into the ES, and details of the habitats present in the 2018 baseline. It also requires the proposal to assess the effects of the proposal (including the 2019 scheme) on the River Thames and Tidal Tributaries SINC, effects on aquatic ecology, and other elements. The ES responds to all these as outlined in table 14.3.

7.432 For its methodology, the ES explains that two baselines informed the assessment:

- 1.The 2018 baseline, comprising a vacant site prior to any demolition or construction work, which will inform the assessment of the effects of the 'Proposed Development' as whole, which includes this proposal cumulatively alongside the rest of the 2019 scheme (Phases 1-4, park and school phase).

- 2.The 2022 baseline, whereby remediation and foundation works are complete, and Phase 1 is under construction (it is nearing completion now), which will inform the assessment of Phase 2 and Phase 3 in isolation.

7.433 The ES methodology undertaken includes desk studies, field surveys (habitat survey, bat roost assessment, Black Redstart survey, Terrestrial Invertebrate Assessment including Streaked Bombardier Survey).

7.434 The ES explains that the proposal will result in the loss of open mosaic habitat on previous developed land (OMHPDL), which will result in a negative effect significant at the local/borough level only. The removal of features suitable for roosting bats will result in a negative effect on bats, significant at the local level only. The construction of Phases 2 and 3 will result in the loss of Jersey cudweed from the Site, resulting in a negative effect on this species significant at the Metropolitan level. The operational phases of the Proposed Development and Phases 2 and 3) will not give rise to any significant effects on any ecological features. All other impacts arising because of the construction of the proposal will not result in any significant effect.

7.435 The permanent loss of OMHPDL was considered a negative effect on the conservation of this habitat at the borough level, equating to a minor adverse (non-significant) effect in EIA For Phase 2 and 3. The relevant additional mitigation measures include the Jersey Cudweed survey, provision of additional habitat for breeding birds along the edge of the river, and monitoring of the river throughout operation. The ES view finds that all likely significant effects have been sufficiently mitigated and any residual effects are negligible and unlikely to contribute to any cumulative effects with other developments, with the exception of:

- 1) OMHPDL: the loss of open mosaic habitat from the site would be considered moderate adverse and significant. This conclusion is predominantly driven by the loss of the more valuable habitat at Bromley By Bow Gasworks (where its impact/significance has increased compared to the 2019 permission where this was not the case), and:
- 2) the River Thames and Tidal Tributaries SMINC. Any identified impacts on the SMINC from schemes located within 1 km of the Site have been mitigated such that residual effects are not significant, but they may lead to an overall negative cumulative effect which would be significant at the Site level. However, it is important to note this equates to a minor adverse (not significant) effect.

7.436 The ES Final Review Report Second Response, August 2024 concludes that the ecological impacts (which includes biodiversity impacts under this category) arising from this proposal would not be 'significant', subject to embedded mitigation measures (secured by S106 legal agreement) and additional mitigation measures which would be secured by planning condition(s). Section 3 of the final/second review report summarises mitigation measures which are to be secured. Additional details are available in Table 17.1 of Chapter 17 of the ES where the applicant provide detailed overview of the mitigation measures. Table 17.2 in Chapter 17 is also useful to note the difference in mitigation measures when compared to the original permission and ES.

River Wall Works:

7.437 Since submission of the application, the applicant submitted further information on proposed works in relation to the river-wall. These works follow the culmination of discussions between the applicant and the Environment Agency to agree details on flood defence measures as part of the flood risk strategy. Consequently, the applicant submitted further documentation with respect to the impact of the works on the River/Riverside ecology: 'The Intertidal and Aquatic Habitats at and Adjacent to the Poplar Riverside Development Site, London: Ecological Review and Discussion Report', May 2024.

7.438 Due to the nature of the works, and its potential impacts on ecology and biodiversity, the Council commissioned an independent qualified assessment of the details. This review notes that whilst the report is comprehensive in its assessment of the potential impacts and proposed mitigation, it is based upon historic and inaccurate survey data. Assumptions on the classifications and quality of the data have been made based on the historic upstream and downstream data. Consequently, the conclusions for the report note that these are significant limitations. Indeed, at Section 9.1, the report states acknowledges this explaining that there is no site-specific ecological data regarding the foreshore habitats, assumptions have been made, and without undertaking an ecological survey of the Poplar Riverside foreshore using quantitative and semi-quantitative techniques, the report authors cannot be sure that its assumption are correct and, consequently, cannot be confident that the assessments

of ecological value and impact of the works are correct or that the mitigation measures proposed are appropriate”.

7.439 As the report concludes that it is not confident with the assessment of the ecological value of the site, nor that the mitigation measures proposed are appropriate, the Council’s independent reviewer provides professional opinion that the surveys recommended in the report (section 9.2) are carried out and the assessment repeated, so that:

- 1) the correct baseline assessment of the site can be used; and
- 2) the mitigation measures represented are reflective of the quality of the habitats and species present.

7.440 Once the recommended surveys have been undertaken, the report should be revised, and the results and mitigation methods updated and resubmitted for review. The requirement for an aquatic baseline survey and assessment of effects was not a stipulated requirement of the ES Scoping Opinion, and therefore the Council’s independent qualified reviews agree with the report’s assertion that this could be managed by a post-decision condition as the impacts are considered capable of being managed. The review of the report concludes that such a condition would be a ‘reasonable and proportion position to take’.

7.441 Subject to the above mitigation measures secured by S106 and conditions, and the additional river works condition to require revised surveys and assessment/mitigation measures, the proposal is acceptable in terms of ecological impacts.

Biodiversity impacts:

7.442 The target Urban Greening Factor score is 0.4, which is the requirement for a predominantly residential development. Both Phases the Proposed Development would meet this requirement, with a score of 0.402 on Phase 2 and 0.403 on Phase 3. The proposals seek to maximise urban greening as far as possible through a combination of ground level and podium/roof level provision of planting and habitat creation as well as permeable paving. Planting typologies which score higher UGF values are proposed where feasible such as wildflower blankets for green roofs, and SuDS/biodiverse planting mixes at ground level. Trees are proposed to be densely planted to maximise the provision on site. Further details and calculations are provided within the DAS. The proposal satisfies London Plan Policy G5 in this respect.

7.443 The proposal was submitted prior to the ‘Biodiversity Net Gain’ requirements which came into force in February 2024. However, in addition to details submitted in Chapter 14 of the ES, the application includes a Biodiversity Net Gain Assessment (BNG) of the on-site habitat baseline and post-intervention habitats. The report seeks to assess the potential impact of the proposed development on biodiversity, and whether the proposed plans will meet the target of a net gain for biodiversity. In terms of biodiversity and ecological features, the landscape proposals for this proposal for Phases 2 and 3 include the creation of approximately:

- 7,437 m² of green roof
- 768 m² of rain garden
- 2,308 m² of amenity grassland
- 387 m² introduced shrub
- 3,226 m² vegetated garden, comprising flower-rich perennial planting of benefit to wildlife, along with a series of native

7.444 The ES review discussed above concludes the biodiversity impacts are not significant subject to mitigation secured by S106/conditions. However, for the purposes of understanding how the biodiversity impacts of the proposal align with the above planning policy framework requirements, the Council has had the application assessed by qualified consultants (in the absence of qualified internal consultees available).

7.445 An assessment was carried out by RSP Group. It notes that while the report follows the correct approach and the 'pre-development habitat figure is acceptable. However, it was not possible to effectively review the post-development section of the report, for the following reasons:

1. The 'post-development' habitat figure does not effectively show the proposed habitats and their conditions. It should include a labelled habitat plan of all the proposed habitats within the scheme, as per the BNG Assessment.
2. Furthermore, there is no detailed assessment of the proposed habitat conditions, and this should be provided prior to determination, to ensure certainty that the correct proposed habitat conditions have been used.

7.446 The report concludes that if the above are provided, a review of the post-development scores can be undertaken to understand that the 'completed development achieves a sufficient uplift in biodiversity value. As currently presented however, it states it is not possible to effectively review the post-development section of the report in terms of its biodiversity credentials.

7.447 Finally, the report notes that the suggestion of a Landscape and Ecological Management Plan (LEMP), to cover the created habitats, and ensuring that they are managed and maintained over a 30-year period is a good inclusion, and this should be conditioned as part of the planning approval. Officers note that the LEMP is also part of the ES embedded mitigation measures and will be secured by condition as appropriate.

7.448 In considering the above concerns in no.1 and 2 above, Officers received a response from the applicant highlighting the following key points:

- a.) The application is not subject to the statutory BNG requirements – the submitted BNG report as submitted as an informative document for the purposes of Local Plan planning policy, where it demonstrates compliance with the planning policy requirement for an enhance of biodiversity, as well as a net gain in biodiversity required by the NPPF.
- b.) The BNG Assessment encompasses the whole masterplan site following earlier (pre) application discussions with LBTH, but must be considered in the context of the limitations that results in. For example, the work focuses on this application proposal for Phases 2 and 3, and a full illustrative masterplan is submitted showing the details of landscaping for those part of the wider site where those details have been approved in full-detailed planning applications (Phase 1) or reserved matters applications (Park Phase A).

7.449 With respect to a) above, Officers accept the BNG is not a statutory requirement here but note the submitted BNG assessment provides useful information for gauging biodiversity credentials of the proposal. With respect to b), which was not clarified to Officers before receipt of the applicant's response, Officers understand the context upon which some 'reasonable assumptions' have been made. The evidence

underpinning these assumptions are either approved detail where full detailed permission/reserved matters exist, information from the Design and Access Statement, Urban Greening Factor, Landscape proposals etc. of this proposal for Phases 2 and 3, and the illustrative landscape masterplan and parameter plans of future outline Phases (Phase 4 and the school). Together, Officers accept these as a reasonable 'best endeavour' approach to underpin the BNG details.

- 7.450 Furthermore, the applicant's response outlines the methodology showing how the post-development habitable conditions were 'graded' in terms of condition. It draws attention to the fact that even if all the habitats proposed were assigned a 'poor' condition, the biodiversity net gain for habitat units would, at its lowest, reach 513.54%. It also highlights that while there is 'good confidence' in achieving the proposed habitat conditions, Local Planning policy does not require this net-gain, in contrast to the statutory BNG requirement which proposal is not obligated to meet.
- 7.451 Officers accept the proposals comprise extensive biodiversity measures with extensive landscaping, planting, etc. and more open space/landscaping than Phases 2 and 3 in the 2019 permission. Based on this, Officers accept that the scheme Officers accept that the scheme appears capable of offering demonstratable biodiversity gains, which would satisfy planning policy. While the Council's review of the proposals not possible to effectively review the post-development section of the report due to the issue listed in '1' and '2' above, Officers consider that these missing details of the post-development habitats and condition should be secured by suitably worded condition(s). Subject to these, Officers are satisfied that the proposal can offer a high-quality biodiversity improvement over existing, in line with planning policy requirements.

Biodiversity: Other matters:

- 7.452 The applicant's response to the Council's BNG review mentions the applicant would accept a planning condition for future outline planning phases. This would be a condition which requires an updated of the BNG assessment at each reserved matters phase indicating whether the proposed habitat meets the quantify and condition specified in 2018 (i.e. the 2019 planning permission PA/18/02803), and any implications for the overall net gain score, including post-development habitat mapping of that phase.
- 7.453 This application is limited to Phases 2 and 3 only, and only Phase 3 is an outline phase requiring a future reserved matters application. This application does not incorporate the other outline phases or approved biodiversity elements of the 2019 scheme, so it is not possible to attach a condition linking to them.
- 7.454 The Council's independent professional review of the BNG report set out what is missing to 'complete' the view that the proposal was acceptable on biodiversity grounds. This missing information is outlined in its response, summarised in points '1' and '2' above. Suitably worded condition(s) or incorporation of this requirement into other relevant condition as appropriate, would address this requirement in a more straightforward matter. Officers therefore recommend the missing post-development habitat information requested in its independent review of the BNG report is secured by condition(s) to secure demonstrable measures to achieve post-development biodiversity improvements. Subject to this, Officers consider the proposal is acceptable on biodiversity grounds.

Consultation responses:

7.455 In coming to the above acceptable conclusion, Officers acknowledge consultation responses received concerning ecology and biodiversity. The PLA consultation refers to the submitted ecology section of the ES and requests further details to be secured to ensure its suggested works/mitigation are carried out. Officers highlight that these issues are resolved in the ES subject to suggested embedded mitigation and additional conditions and therefore there is no need for additional conditions as requested by the PLA.

7.456 For the same reasons, while the comments and suggestions for farther conditions on ecology/biodiversity grounds from the Lea Valley Regional Park Authority and the GLA are noted, these are not considered necessary given the extent of detailed considerations and mitigations investigation and recommended in the ES review, as well as due to the conditions arising from the additional biodiversity and ecology reviews commissioned by the LPA discussed above.

Ecology and Biodiversity: conclusion

7.457 Subject to embedded mitigation measures secured by the S106 legal agreement, and further details to be secured by planning conditions, the proposal would be acceptable in terms of ecology and biodiversity impacts.

LOCAL FINANCE CONSIDERATIONS

7.458 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.

PLANNING BALANCE

7.459 As discussed earlier in the report, the local planning authority has a statutory obligation under Sections 66 (1) and 72 (1) of the Planning (Listed Building and Conservation) Acts 1990 to the conservation of designated heritage assets. In accordance with the aforementioned Act, paragraph 205 of the NPPF sets out that 'great weight' should be given to protection of designated assets, 'irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

7.460 As stated in the Design and Heritage section of this report, the proposal would cause some low-level 'less than substantial' harm to nearby heritage assets. This would arise due to the built presence, and taller form/height of the proposal compared to the variants of Phase 2 and 3 in the 2019 scheme, rendering them more prominent/visible to/from/seen in the context of nearby heritage assets.

7.461 Upon that basis, it falls upon the Council, as decision maker to apply a public benefit planning balance test, as set out in paragraph 208 of the NPPF which states that "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"

7.462 The key public benefits are:

- 1) Early delivery of affordable housing by building early in a dedicated part of Phase 2 (Building A&B)
- 2) Above policy-target provision of much-needed 'family sized' affordable housing.

- 3) Increased financial contributions towards local infrastructure and employment/skills/training.
- 4) Better housing quality through a different building form than the 2019 scheme
- 5) Provision of high-quality open spaces, play areas, landscaping, public and private outdoor amenity spaces, and to a superior standard than the 2019 scheme.
- 6) Environmental benefits including energy efficiency/sustainability measures, and biodiversity/ecological improvements and measures, all superior to the 2019 scheme.

7.463 Further to the above, in line with para.208 of the NPPF, as established in the report above, this proposal also secures the 'optimum viable' use by optimising the site capacity and achieving a high-quality development.

7.464 Officers are of the view that the public benefits identified under points 1, 2, and 3 are matters which carry substantial weight. This view is reached in respect of 1 and 2 having regard to the contribution the proposal makes to housing supply, and the type of supply, namely the provision of affordable rented family-sized units which are a particular strategic priority for the Council in seeking to address. Similarly, with respect to 3, the proposal provides significant additional resources towards managing the impact of this housing and the physical and social infrastructure demand arising from it.

7.465 Officers consider points 4, 5, and 6 are public benefits which carry moderate weight given the quality of housing supply, quality of life, and high standard of environmental credentials and measures which would feature, including how they offer an improvement over the offer in the existing approved 2019 scheme.

7.466 Altogether, the weight afforded to these public benefits, and how the proposal secures the optimum viable use of the site, carries substantial weight which is easily sufficient to outweigh the harm that has been identified to heritage assets. Consequently, the proposal passes the 'paragraph 208' test.

7.467 In addition to the above balancing exercise, it will have been noted throughout this report that Officers consider some aspects of the proposal acceptable, on balance, noting that some considerations are a matter of judgement and competing interests. However, overall, the report makes clear and justifies why the considerations are acceptable where judgements are made.

7.468 In summary, the benefits of the proposal far outweigh any identified harm.

HUMAN RIGHTS & EQUALITIES

7.469 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.

7.470 The proposed development does however provide a series of benefits in this regard, including the provision of wheelchair units, associated disabled car parking, the creation of jobs and the provision of community space.

7.471 The application has undergone the appropriate level of consultation with the public and Council consultees. The applicant has also undertaken community engagement with neighbouring residents.

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

8. RECOMMENDATION

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

8.2 Financial obligations

- £491,304.00 towards construction phase employment skills training
- £33,884.40 towards end-user phase employment skills training
- £1,567,500 toward carbon emission off-setting
- £221,112 connectivity contribution
- £150,000 transport contribution to TFL
- £ 99,712 development co-ordination and integration fee
- 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

8.3 Non-financial obligations:

Affordable Housing across the entire development:

- 35% provision across the development (by habitable room)
- 70% social rented units (50% at London Affordable Rent and 50% at Tower Hamlets Living Rent)
- 30% Intermediate units
- Early-Stage Viability Review

Affordable housing across Phase 2 of the development (34% by habitable room):

- -96% Social rent units (50% at London Affordable Rent and 50% At Tower Hamlets Living Rent)
- -4% Intermediate units, delivered as shared ownership
- Details and implementation of London Affordable Rent/Tower Hamlets Living Rent 'wheelchair accessible' dwellings (to M4(3)(b) standard)

Employment:

- 20% local procurement
- 20% local labour in construction
- Council's job brokerage service to advertise Construction-Phase/ End-User jobs
- Safeguarding of land for future bridge connections/landing points
- Long term management and maintenance arrangements for future new bridge connections (landing points)

Transport matters:

- Car Free development (residential)
- Car club for 3 years
- Residential Travel Plan & monitoring.

Other:

- Public realm/access to river & park areas
- Energy efficiency measures
- Considerate Contractors Scheme
- Implementation of mitigation measures as per the ES documents

8.4 That the Corporate Director of Place is delegated the power to negotiate the legal agreement. If within six 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. Three-year deadline for commencement of development.
2. Development in accordance with approved plans.
3. Commencement date for Reserved Matters
4. Construction – Restrictions on demolition and construction activities:
5. Best endeavours to utilise mart and off-site manufacture of prefabricated components for construction.
6. Removal of permitted development rights for commercial space (Class E) to change to residential.
7. Removal of permitted development rights to erect boundary treatment.
8. The carbon savings are delivered as identified in the Energy Statement.
9. Energy and sustainability
10. Noise standard limits from mechanical plant and equipment
11. Communal amenity space available prior to occupation
12. Development to be carried out in accordance with approved fire strategy
13. TV reception interference mitigation
14. Compliance standards for Non-Road Mobile Machinery (NRMM) to manage and prevent further deterioration of existing low-quality air, as set out in report above.
15. Details of lighting to be secured and carried out in accordance with approved details to ensure impact on river Lea, fish, birds, and mammals, particular from overshadowing and light spill, is minimised.
16. Phase 3 and 4 emergency generators to be sited at roof level without a cowl.
17. Control on life safety generators test hours – operate for 15 minutes on a weekly basis and a full load test for one house annually within Phases 2 and 3 – a total of 14 hours per annum.
18. Air quality standards for gas-fired boilers.
19. Any reserved matters application for Outline Phase 3 shall require the LPA To consult the HSE and shall require the submission and subsequent approval by the LPA (in consultation with the HSE) of a satisfactory fire statement.

Pre-commencement

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

20. Phasing plan to be submitted for the outline element (Phase 3) before commencement of development for scheme to be recognised as a phased development for CIL purposes.
21. Dust management plan
22. Construction Environmental Management Plan and Construction Logistics Plan, including securing ES mitigation measures comprising: Opportunities to review the materials prior to construction for lower embodied carbon, Requirement to record and monitor the CO2 emissions from transport, Confirmation that unloading of vehicles will be carried out on-site rather than on the adjacent roads, Ensure vehicles making deliveries or removing spoil from the Site should travel via designated traffic routes, Ensure construction traffic should be controlled by means of a vehicle arrival and departure management plan.
23. Strategy to deal with potential ground contamination/remediation.
24. Submission and approval of revised ecological survey (arising from river/riverside works) and report to LPA to confirm results and any necessary mitigation measures to be secured.
25. Submission and approval of further 'post-development' including necessary details to show proposed habitats and their conditions, including a labelled habitat plan and assessment of proposed habitat conditions.
26. Bird Hazard Management Plan to be submitted prior to commencement of above-ground works, in consultation with London City Airport.
27. Prior to the commencement of above ground works for each Phase (Detailed and Outline), a Landscape and Ecological Management Plan (LEMP) for approval, to include monitoring effects of the approved development on the River Lea.
28. Piling details (for each phase)
29. Submission of Site Waste Management Plan
30. Construction cranes (consult LCY)
31. Pre-construction surveys for Jersey Cudweed and strategy for translocation if necessary, and commitment to monitor effects of works on neighbouring SMINC.

Pre-superstructure works

32. Details and submission of samples of external facing materials and architectural detailing (Detailed and Outline).
33. Approval of landscaping details, including tree planting and measures for wind mitigation on Phase 2 rooftop terrace, and ground floor and podium areas,
34. Details of long stay and short stay cycle parking and facilities
35. Detailed SuDS measures and Drainage Management Strategy
36. Details of ecological enhancement measures
37. Operational Waste Management Plan (OWMP).

Pre-occupation works

38. Details for provision of Provision of Riparian lifesaving equipment be submitted to and approved in writing by the LPA in consultation with the PLA and installed before occupation of Phase 2.
39. Final details of PV specification demonstrating energy generation maximised with Biosolar roofs installed where feasible.
40. No occupation until confirmation by the LPA, in consultation with Thames Water, that either a) all water network upgrades required to accommodate the additional demand to serve the development have been completed, or b) a development and infrastructure phasing plan is agreed and adhered to.
41. Secure Wind and Micro-climate ES mitigation measures for Phase 2 and Phase 3, as identified in 'RPS's second response to applicant comments on the es review report' Report, August 2024.
42. Provide information pack to new residents about local shops and services.

43. Submission and approval and implementation of details for noise barrier located at roof edge to reduce noise levels to existing two or three storey dwellings.
44. Requirement to use passive measure such as attenuated vents/louvres or a mechanical cooling option in Outline Phase 3 facing Blackwall Trading Estate.
45. Car Park and Design Management Plan
46. Disabled persons parking and electric vehicle car parking provision
47. Delivery and Servicing Management Plan
48. Car club membership for eligible occupiers
49. Travel Plans (for all land uses)
50. Prior to the occupation of Phase 2, details of the provision of Riparian lifesaving equipment shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Port of London Authority.
51. Development constructed to protect against noise impacts by ensuring relevant noise standards are met.
52. Require a post-completion verification report, including noise test results, to demonstrate construction to the required noise protection measures/standards.
53. Details of kitchen extract for any unit with a commercial kitchen to be submitted to and agreed in writing by the LPA.
54. An Air Quality Neutral assessment for the emergency generators to be installed within the development shall be submitted to and approved by the LPA.
55. SBD Accreditation
56. Open Space Management Strategy
57. Bus stand relocation
58. Water supply impact study
59. Submission and approval of ecological improvement measures to feature, including: creation of modified grassland, replacement Open Mosaic Habitat at ground and roof level, surveys to protect the conservation status of bat roosts.
60. Submit evidence of carrying out a London Authorities Noise Action Forum (LANAF) risk assessment.

Post completion

61. Post completion report (including As Build calculations) is submitted to demonstrate energy / CO2 savings have been delivered.
62. Post-occupation wellbeing and satisfaction survey.
63. Demonstrate measures of working with the community to ensure appropriate businesses and organisations move into commercial and community space.

Informatives

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Thames Water pressure information.
4. PM10 Monitoring.
5. Air Emission Flue Informative.
6. CRT's Code of Practice for relevant works.
7. Consult CRT if any temporary works within/oversailing Bow Creek.
8. Environment Agency informative(s).
9. Advice on engaging with Metropolitan Police Designing Out Crime service.
10. London City Airport informative(s) regarding crane methodology and notification of erection of cranes.
11. Advice on Port of London Authority licencing requirements.
12. Health and Safety informative(s).
13. Advice on procedure to supply GIA on a floor-by-floor basis against charging rates in order to speed up-the Council's GIA validation of the approved drawings to calculate the CIL charge.

APPENDIX 1

Schedule of drawings

Drawings (plans and elevations)

Drawing number	Title of Drawing
01289G-JTP-DR-MP-XX-0001	Site Location Plan
01289G-JTP-DR-MP-XX-0002	Phase 2 Proposed Block Plan
01289G-JTP-DR-MP-XX-0004 Rev.A	Phase 2 & 3 S73 Site Plan
Parameter Plans (Outline Phase 3)	
01289G-JTP-DR-MP-PP-1001	Parameter Plan 1 - Hybrid Planning Application Boundary
01289G-JTP-DR-MP-PP-1002	Parameter Plan 2 - Proposed Outline & Full Planning Application Areas
01289G-JTP-DR-MP-PP-1003	Parameter Plan 3 - Existing Site Levels
01289G-JTP-DR-MP-PP-1004	Parameter Plan 4 - Proposed Development Parcels
01289G-JTP-DR-MP-PP-1005	Parameter Plan 5 - Proposed Site Levels
01289G-JTP-DR-MP-PP-1006	Parameter Plan 6 - Proposed Predominant Ground Floor Uses
01289G-JTP-DR-MP-PP-1007	Parameter Plan 7 - Proposed Access & Movement
01289G-JTP-DR-MP-PP-1008	Parameter Plan 8 - Proposed Basements
01289G-JTP-DR-MP-PP-1009	Parameter Plan 9 - Proposed Maximum Development Block Footprints
Proposed Plans (Phase 2 detailed component)	
01289G-JTP-DR-PH2-AB-00-1010, Rev.A	Phase 2 - General Arrangement - Building A&B - Ground
01289G-JTP-DR-PH2-AB-00M-1010	Phase 2 - General Arrangement - Building A&B - Ground Mezzanine
01289G-JTP-DR-PH2-AB-01-1010, Rev.B	Phase 2 - General Arrangement - Building A&B - Level 01
01289G-JTP-DR-PH2-AB-02-1010, Rev.A	Phase 2 - General Arrangement - Building A&B - Level 02
01289G-JTP-DR-PH2-AB-XX-1010	Phase 2 - General Arrangement - Building A&B - Level 03 to 09
01289G-JTP-DR-PH2-AB-10-1010	Phase 2 - General Arrangement - Building A&B - Level 10
01289G-JTP-DR-PH2-AB-XX-1011	Phase 2 - General Arrangement - Building A&B - Level 11 to 13
01289G-JTP-DR-PH2-AB-14-1010	Phase 2 - General Arrangement - Building A&B - Level 14

01289G-JTP-DR-PH2-AB-15-1010	Phase 2 - General Arrangement - Building A&B - Level 15
01289G-JTP-DR-PH2-AB-16-1010	Phase 2 - General Arrangement - Building A&B - Level 16
01289G-JTP-DR-PH2-AB-17-1010	Phase 2 - General Arrangement - Building A&B - Level 17
01289G-JTP-DR-PH2-AB-18-1010	Phase 2 - General Arrangement - Building A&B - Level 18
01289G-JTP-DR-PH2-AB-18-1010	Phase 2 - General Arrangement - Building A&B - Roof
01289G-JTP-DR-PH2-CD-00-1010, Rev.B	Phase 2 - General Arrangement - Building C&D - Ground
01289G-JTP-DR-PH2-CD-01-1010, Rev.A	Phase 2 - General Arrangement - Building C&D - Level 01
01289G-JTP-DR-PH2-CD-XX-1010	Phase 2 - General Arrangement - Building C&D - Level 02 to 13
01289G-JTP-DR-PH2-CD-14-1010	Phase 2 - General Arrangement - Building C&D - Level 14
01289G-JTP-DR-PH2-CD-15-1010	Phase 2 - General Arrangement - Building C&D - Level 15
01289G-JTP-DR-PH2-CD-16-1010	Phase 2 - General Arrangement - Building C&D - Level 16
01289G-JTP-DR-PH2-CD-XX-1011	Phase 2 - General Arrangement - Building C&D - Level 17 to 19
01289G-JTP-DR-PH2-CD-20-1010	Phase 2 - General Arrangement - Building C&D - Level 20
1289G-JTP-DR-PH2-CD-21-1010	Phase 2 - General Arrangement - Building C&D - Level 21
01289G-JTP-DR-PH2-CD-22-1010	Phase 2 - General Arrangement - Building C&D - Level 22
01289G-JTP-DR-PH2-CD-23-1010	Phase 2 - General Arrangement - Building C&D - Roof
01289G-JTP-DR-PH2-EF-00-1010, Rev.B	Phase 2 - General Arrangement - Building E&F - Ground
01289G-JTP-DR-PH2-EF-01-1010, Rev.A	Phase 2 - General Arrangement - Building E&F - Level 01
01289G-JTP-DR-PH2-EF-XX-1010	Phase 2 - General Arrangement - Building E&F - Level 02 to 14
01289G-JTP-DR-PH2-EF-15-1010	Phase 2 - General Arrangement - Building E&F - Level 15
01289G-JTP-DR-PH2-EF-XX-1011	Phase 2 - General Arrangement - Building E&F - Level 16 to 17
01289G-JTP-DR-PH2-EF-18-1010	Phase 2 - General Arrangement - Building E&F - Level 18
01289G-JTP-DR-PH2-EF-19-1010	Phase 2 - General Arrangement - Building E&F - Level 19
01289G-JTP-DR-PH2-EF-20-1010, Rev.A	Phase 2 - General Arrangement - Building E&F - Level 20

01289G-JTP-DR-PH2-EF-XX-1012	Phase 2 - General Arrangement - Building E&F - Level 21 to 22
01289G-JTP-DR-PH2-EF-23-1010	Phase 2 - General Arrangement - Building E&F - Level 23
01289G-JTP-DR-PH2-EF-XX-1013	Phase 2 - General Arrangement - Building E&F - Level 24 to 26
01289G-JTP-DR-PH2-EF-27-1010	Phase 2 - General Arrangement - Building E&F - Level 27
01289G-JTP-DR-PH2-EF-28-1010	Phase 2 - General Arrangement - Building E&F - Level 28
01289G-JTP-DR-PH2-EF-28-1010	Phase 2 - General Arrangement - Building E&F - Roof
01289G-JTP-DR-PH2-XX-1942, Rev.A	Affordable - 2B4P - TYPE 02 (WHC)
8298-LDA-ZZ-ZZ-DR-0300-001	Hardworks General Arrangement Drawing - Phase 2
8298-LDA-ZZ-ZZ-DR-0400-001	Softworks General Arrangement Plan – Phase 2
	Proposed Elevations (Phase 2 detailed component)
01289G-JTP-DR-PH2-AB-ELE-1101	Phase 2 - Proposed Elevations - Building A&B - 1 & 2
01289G-JTP-DR-PH2-AB-ELE-1102	Phase 2 - Proposed Elevations - Building A&B - 3 & 4
01289G-JTP-DR-PH2-AB-ELE-1103	Phase 2 - Proposed Elevations - Building A&B - 5 & 6 (Podiums)
01289G-JTP-DR-PH2-AB-ELE-1104, Rev.A	Phase 2 - Proposed Elevations - Building A&B - Ground Floor
01289G-JTP-DR-PH2-CD-ELE-1101	Phase 2 - Proposed Elevations - Building C&D - 1 & 2
01289G-JTP-DR-PH2-CD-ELE-1102, Rev.A	Phase 2 - Proposed Elevations - Building C&D - 3 & 4
01289G-JTP-DR-PH2-CD-ELE-1103	Phase 2 - Proposed Elevations - Building C&D - 5 & 6 (Podiums)
01289G-JTP-DR-PH2-CD-ELE-1104, Rev.A	Phase 2 - Proposed Elevations - Building C&D - Ground Floor
01289G-JTP-DR-PH2-EF-ELE-1101, Rev.A	Phase 2 - Proposed Elevations - Building E&F - 1 & 2
01289G-JTP-DR-PH2-EF-ELE-1102	Phase 2 - Proposed Elevations - Building E&F - 3 & 4 (Podium)
01289G-JTP-DR-PH2-EF-ELE-1103	Phase 2 - Proposed Elevations - Building E&F - 5 & 6 (Podium)
01289G-JTP-DR-PH2-EF-ELE-1104	Phase 2 - Proposed Elevations - Building E&F - 7 & 8
01289G-JTP-DR-PH2-EF-ELE-1105	Phase 2 - Proposed Elevations - Building E&F - 9 (Podium Frontage)
01289G-JTP-DR-PH2-EF-ELE-1106, Rev.A	Phase 2 - Proposed Elevations - Building E&F - Ground Floor
01289G-JTP-DR-PH2-EF-ELE-1107, Rev.A	Phase 2 - Proposed Elevations - Building E&F - Ground Floor

	Proposed Sectional (Phase 3 is representative)
01289G-JTP-DR-PH2-XX-ELE-1101, Rev.A	Phase 2 - Proposed Site Sectional Elevation AA
01289G-JTP-DR-PH2-XX-ELE-1102, Rev.A	Proposed Site Sectional Elevation BB
	Landscape Drawings
8298-LDA-ZZ-ZZ-DR-0100-001	Illustrative Detailed Landscape Masterplan
8298-LDA-ZZ-ZZ-DR-0100-002_	Illustrative Outline Landscape Masterplan
N/A	Landscape General Arrangement, October 2023

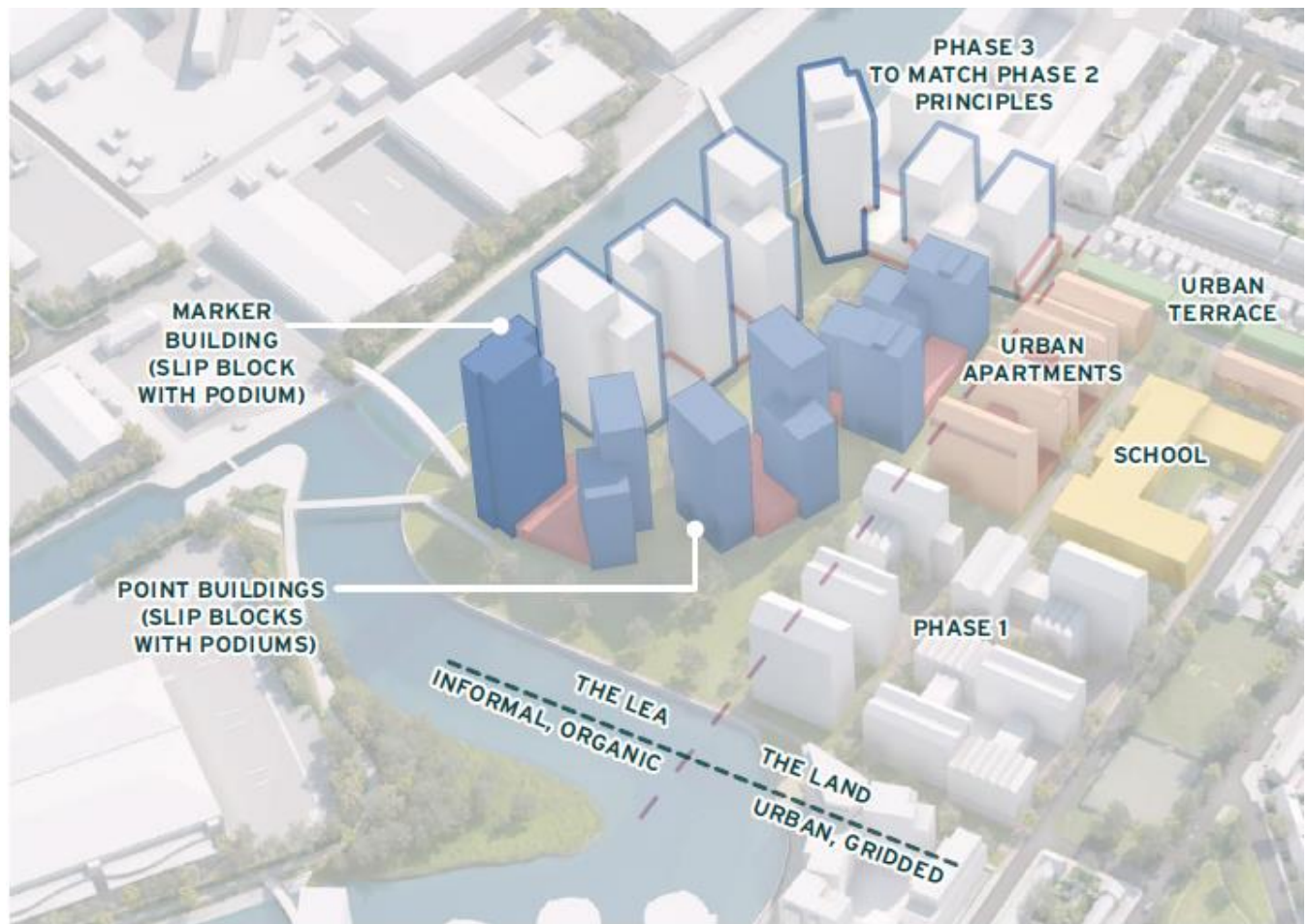
Documents list.

Title of Document	Date/version/reference
Access Statement, October 2023	N/A
Car Park Management Plan, October 2023	N/A
Circular Economy Statement, April 2024	V.3 dated 18/10/2023
Construction Logistics Plan, October 2023	Rev.00
Framework Delivery and Servicing Plan, October 2023	N/A
Design & Access Statement, October 2023	N/A
Detailed Unexploded Ordnance Risk Assessment, October 2023	Report Reference: DA5148-02
Development Specification (including Design Controls), October 2023	N/A
Draft Construction Environment Method Statement, April 2024, Updated September 2024	N/A
Dynamic Overheating Report, October 2023	V.3 dated 18/10/2023
Energy Statement, October 2023	V.5 dated 25/10/2023
Environmental Statement prepared by 'Temple', dated October 2023, updated 2024	N/A
RPS'S RESPONSE TO APPLICANT COMMENTS ON THE ES REVIEW REPORT	Reference: 794-PLN-LSE-00141, V1, June 2024
RPS'S SECOND RESPONSE TO APPLICANT COMMENTS ON THE ES REVIEW REPORT	Reference: 794-PLN-ESH-00145, V1, August 2024
ENVIRONMENTAL STATEMENT REVIEW REPORT	Reference: 794-PLN-LSE-00141, V2, April 2024
Fire Gateway One Form	Dated 06/08/2024

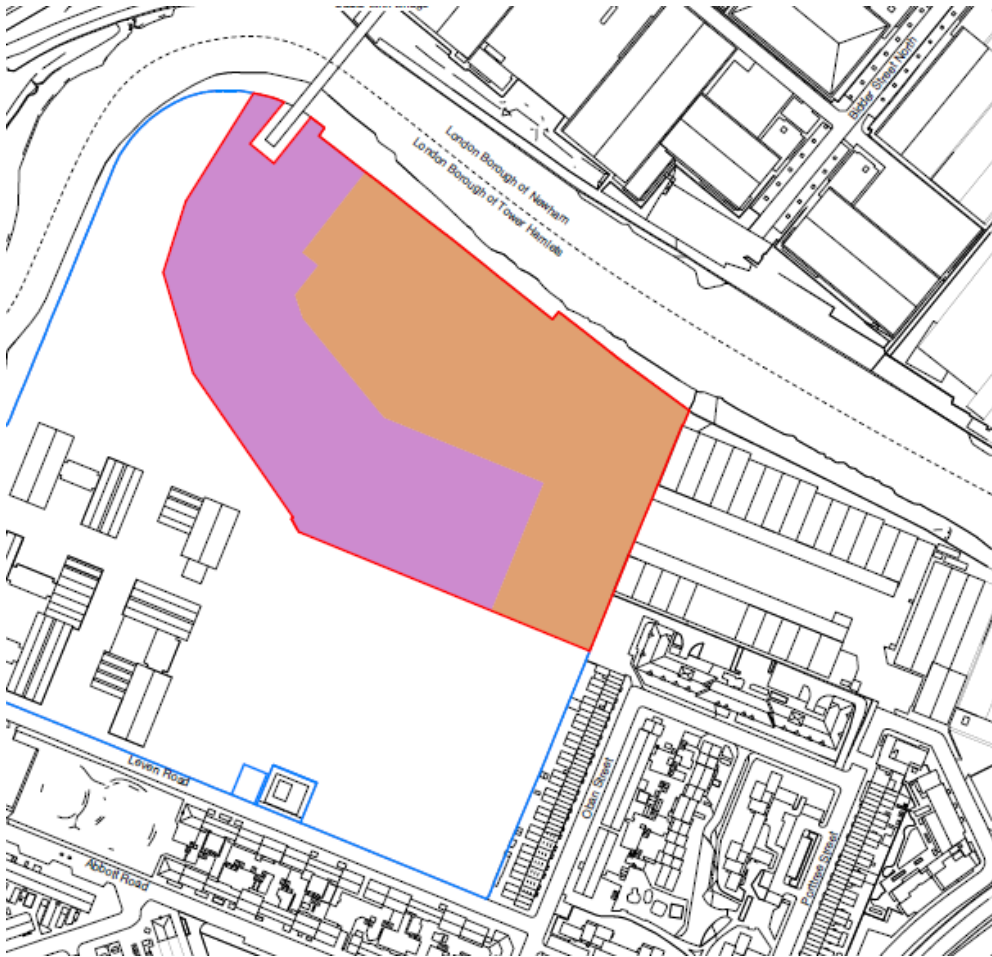
Outline Fire Strategy, August 2024	Rev.3
Flood Risk Assessment	Dated 08/03/024
Framework Travel Plan (Commercial), October 2023	N/A
Framework Travel Plan (Residential), October 2023	N/A
Health Impact Chapter 15, within Environmental Statement dated October 2023	N/A
Heritage Statement, October 2023	N/A
Internal Daylight and Sunlight Report, Phase 2 and 3, October 2023	Report ref: 2618
Landscape Strategy, October 2023	N/A
Lighting assessment on external properties (Daylight, Sunlight, Overshadowing and Solar Glare) within Chapter 8 of the Environmental Statement dated October 2023	N/A
Biodiversity Net Gain Assessment, October 2023	Version 1.0 dated 17/10/2023
Operational Waste Management Strategy, October 2023	N/A
Outline Drainage Strategy, October 2023	Report ref no: W352-WSP-SW-XX-RP-D- 010-00
Overshadowing to River Lea, October 2023	N/A
Planning Statement, October 2023	N/A
Remediation Phasing Plan	Revision:00 dated 29/09/2023
Consultation Statement, October 2023	N/A
Sustainability Statement	V.4 dated 25/10/23
Townscape and Visual Impact Assessment, October 2023	N/A
Transport Assessment, October 2023	N/A

APPENDIX 2 – Proposed Plans, Elevations and Visualisations





Typologies across Phases 1 to 4

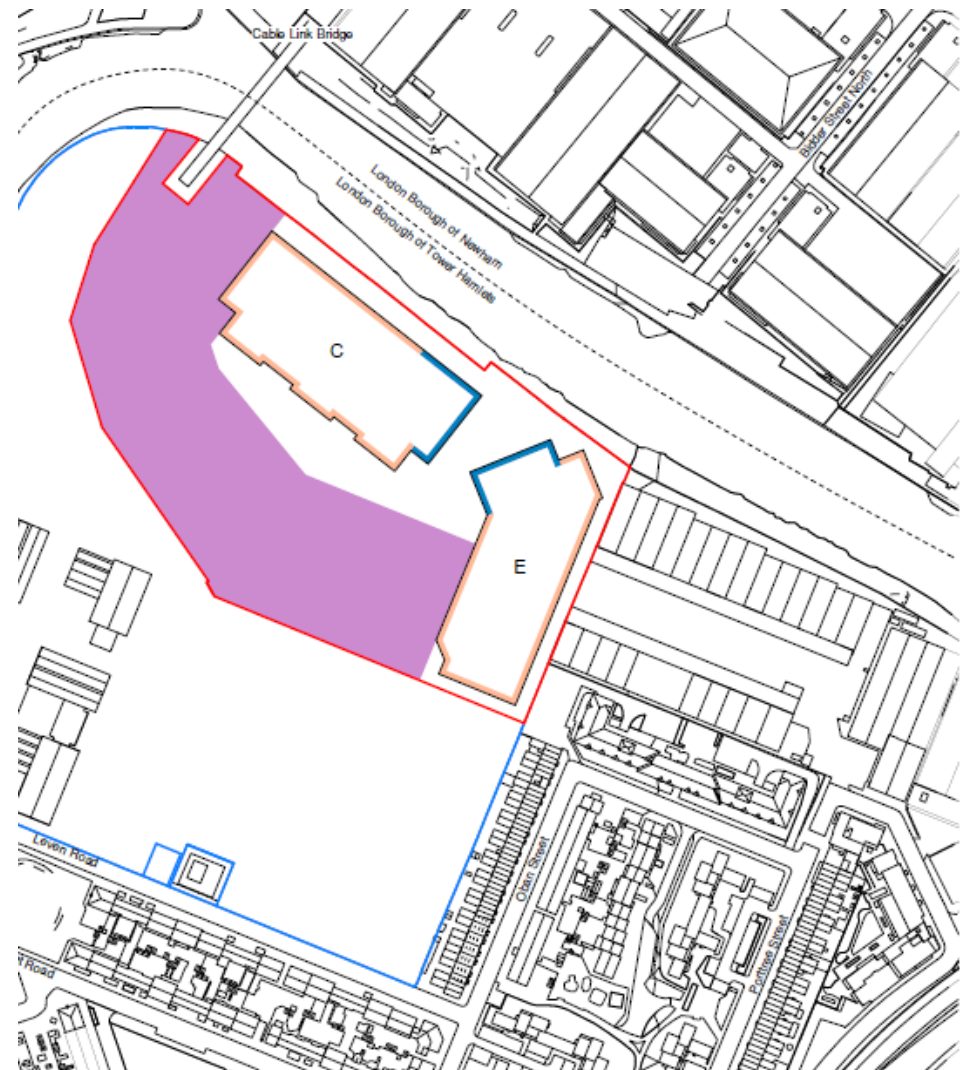


- *Drop-In Hybrid Planning Application Boundary Line
- Surrounding Phase Identification
Subject to Sui Generis Planning Permission PA/19/02003
- Extent of Full Planning Application Boundary
- Extent of Outline Planning Application Boundary

Site	Code	Description	Drawn	Check
Planning				
Site: St William				

jtp JTP Studio, Ltd
The Southwark
Cannery Building
Leven Road, Poplar
London E12 9LW
www.jtpstudio.co.uk

Project:
**Leven Road Gasworks
Poplar Riverside**



01259G_PP-0006 Key information

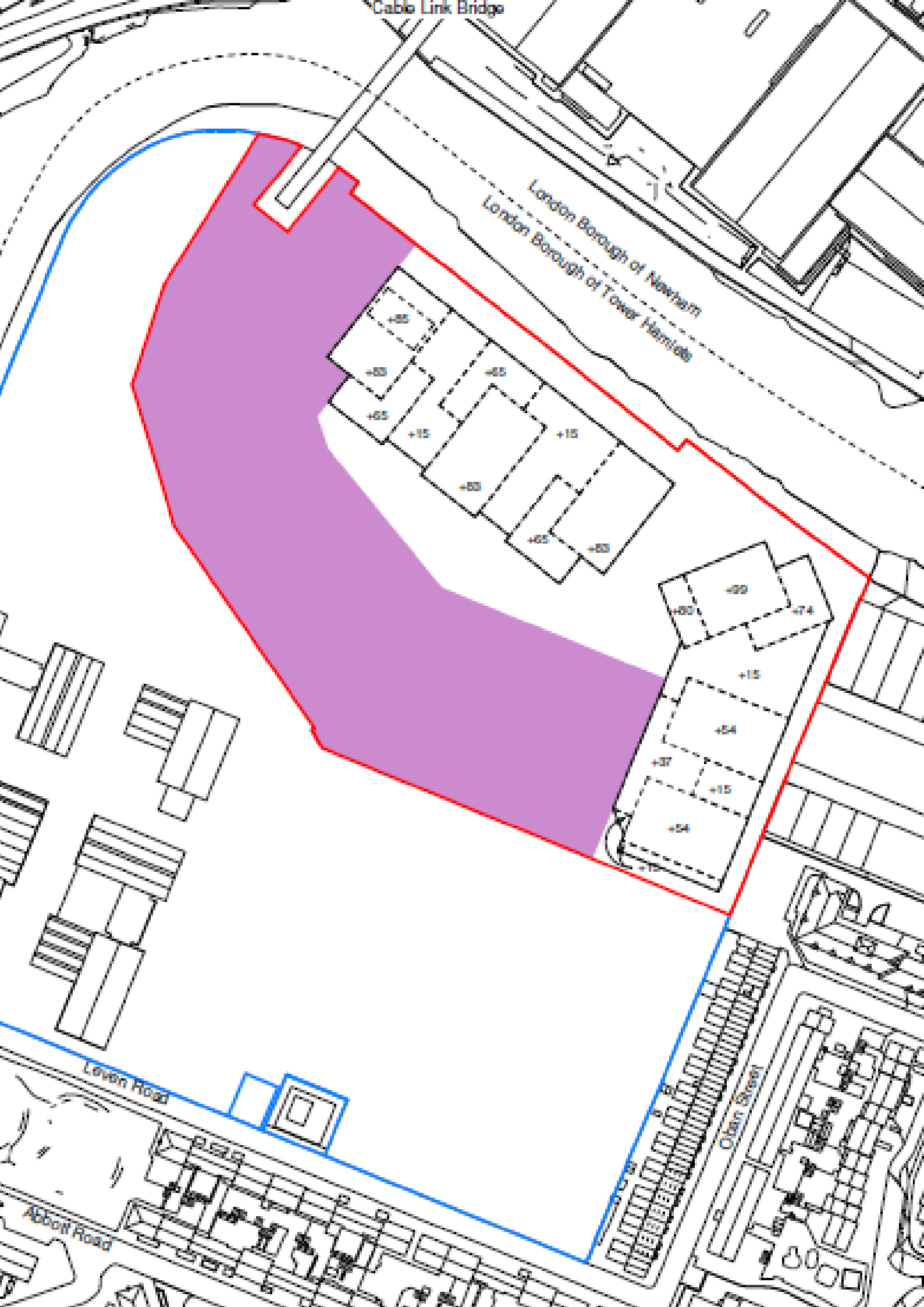
- *Drop-In Hybrid Planning Application Boundary Line
- Surrounding Phase Identification
Subject to Sui Generis Planning Permission PA/19/02003
- Extent of Full Planning Application Boundary
- Development Parcel (includes an allowance of up to 2.0m for soil on balconies, canopies and awnings projecting out from the plot extents)
- x Development Parcel Name
- Non Residential (Class C)
- Residential / Resident Facilities

Site	Code	Description	Drawn	Check
Planning				
Site: St William				

jtp JTP Studio, Ltd
The Southwark
Cannery Building
Leven Road, Poplar
London E12 9LW
www.jtpstudio.co.uk

Project:
**Leven Road Gasworks
Poplar Riverside**

Working for:
Parameter Plan 6



London Borough of Newham
London Borough of Tower Hamlets

Laven Road

Abbott Road

Obain Street



Ground floor footprint example – Building A & B







SLIP TYPOLOGY - BUILDING A/B





Proposed Ground Floor Elevations - Building A&B - Elevation 1 (North)



Proposed Ground Floor Elevations - Building A - Elevation 2 (East)



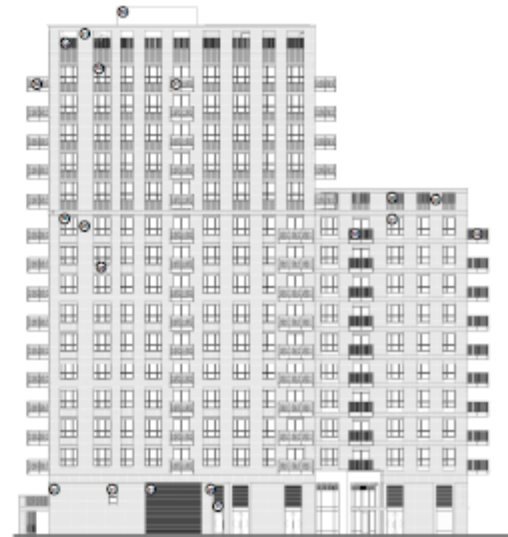
Proposed Elevations - Building A&B - Elevation 3 (South)



Proposed Elevations - Building A&B - Elevation 1

← Building A →

← Building B →



Proposed Elevations - Building A&B - Elevation 2

← Building A →

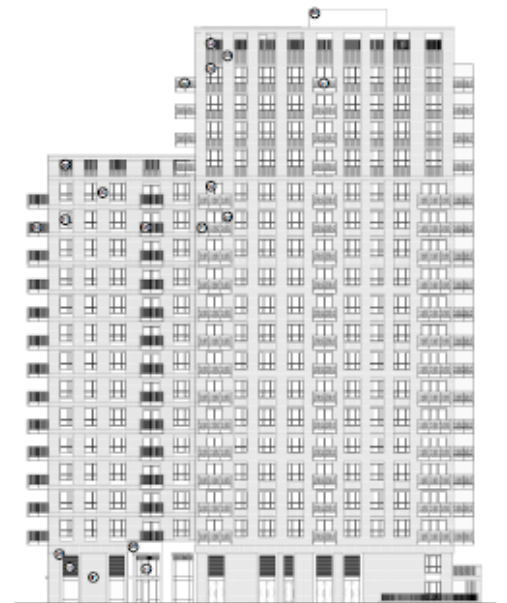
100%
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Proposed Elevations - Building A&B - Elevation 3

← Building B →

← Building A →



Proposed Elevations - Building A&B - Elevation 4

← Building B →



Notes:
 1. The site is bounded by the existing buildings on the north and east sides.
 2. The site is bounded by the existing buildings on the south and west sides.
 3. The site is bounded by the existing buildings on the north, east, south and west sides.
 4. The site is bounded by the existing buildings on the north, east, south and west sides.



Scale:
 1:1000
 1:2000
 1:5000

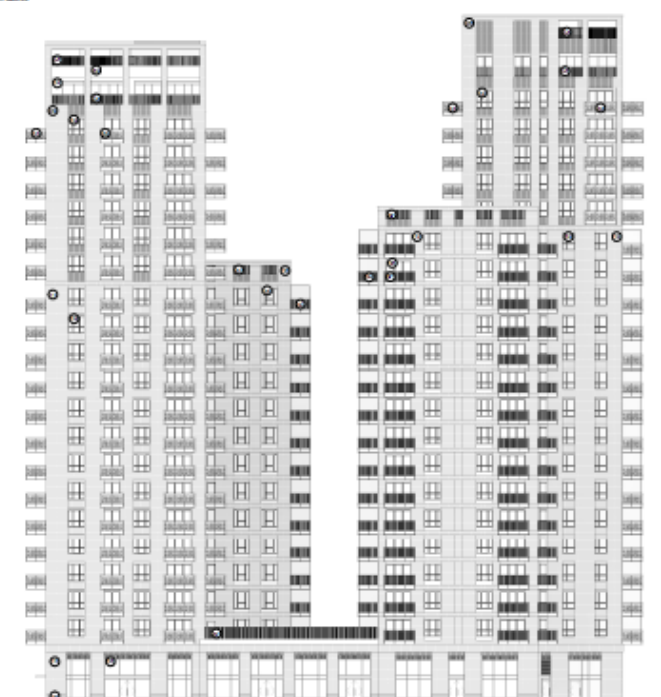
Scale: 1:1000
 Date: 10/10/10
 Drawing No: 101010
 Drawing Title: Phase 2 - General Arrangement Building C&D - Ground
 Client: St William

Leven Road Gasworks
 Poplar Riverside

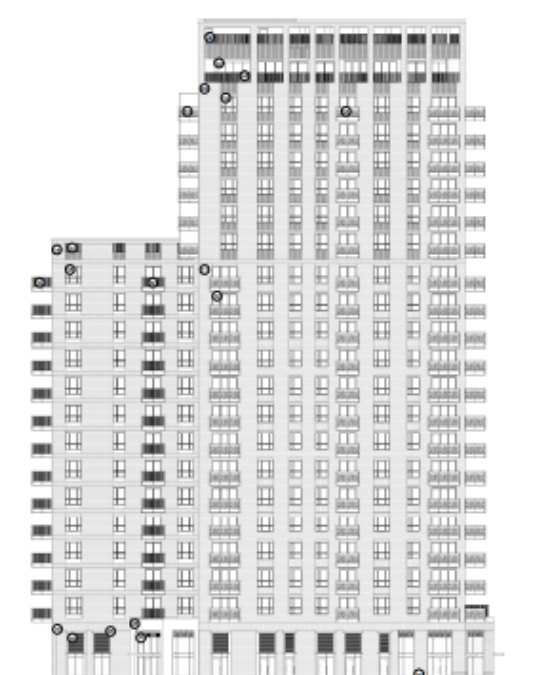
Phase 2 - General Arrangement
 Building C&D - Ground

Scale: 1:1000
 Date: 10/10/10
 Drawing No: 101010
 Drawing Title: Phase 2 - General Arrangement Building C&D - Ground

- 1. Building D
- 2. Building C
- 3. Building B
- 4. Building A
- 5. Building E
- 6. Building F
- 7. Building G
- 8. Building H
- 9. Building I
- 10. Building J
- 11. Building K
- 12. Building L
- 13. Building M
- 14. Building N
- 15. Building O
- 16. Building P
- 17. Building Q
- 18. Building R
- 19. Building S
- 20. Building T
- 21. Building U
- 22. Building V
- 23. Building W
- 24. Building X
- 25. Building Y
- 26. Building Z



Proposed Elevations - Building C&D - Elevation 3



Proposed Elevations - Building C&D - Elevation 4





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View from Leven Central towards Blocks B and C



Notes:

- Do not scale from this drawing.
- Dimensions are not to scale and are not necessarily to be taken as final.
- Construction is to be in accordance with the latest British Standards and BS 1191:2013 for the purpose of this drawing.
- Final construction is to be in accordance with the approved plans.
- The drawing is not to be used for any other purpose without the written consent of the author.



Legend:

- Green: Grass
- Blue: Water
- Yellow: Paved
- Grey: Building
- Black: Boundary

A - Site of Interest		Date	
No.	Description	Date	Drawn
Planning			

St William



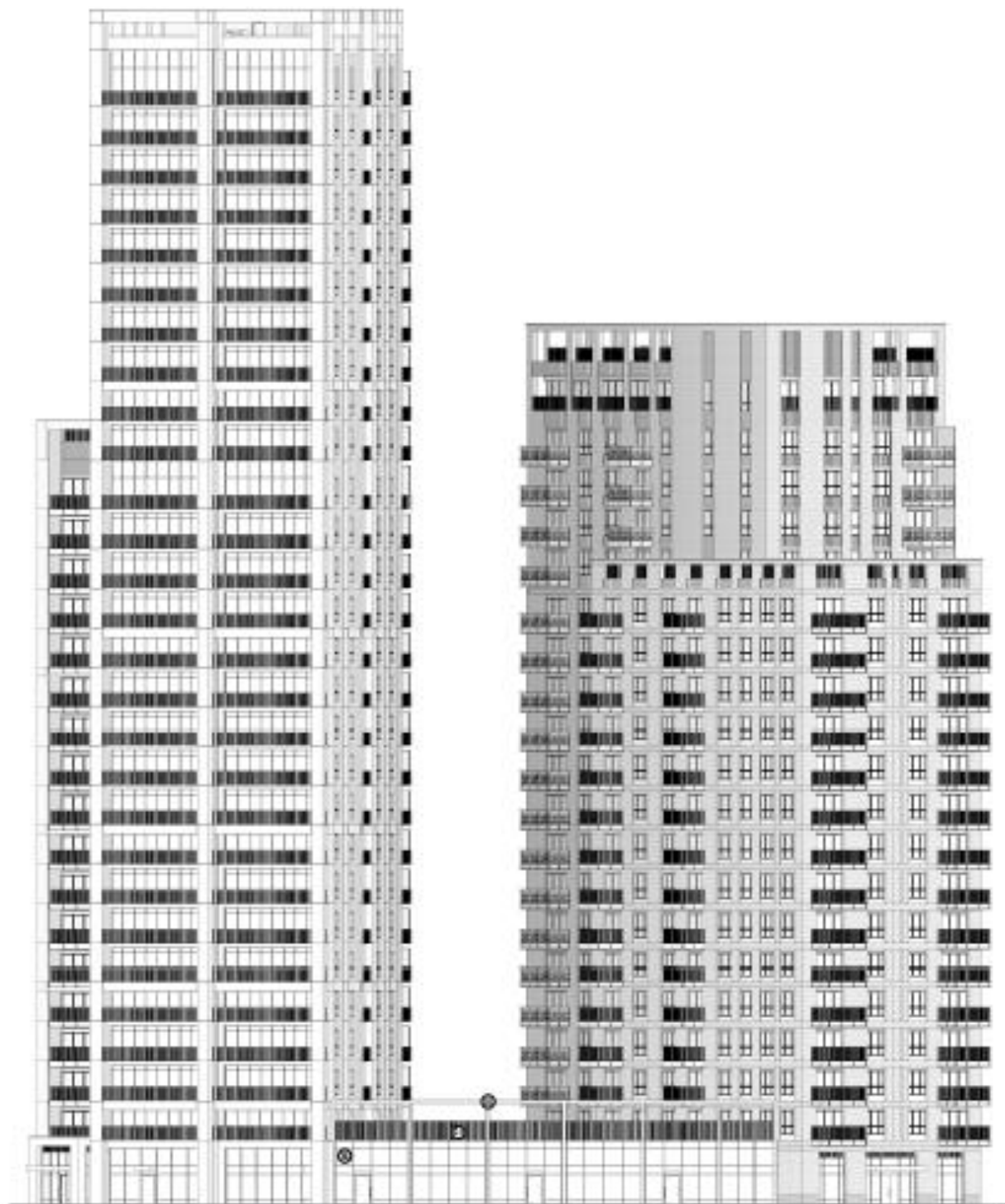
Project:
Leven Road Gasworks
Poplar Riverside

Working Title:
Phase 2 - General Arrangement
Building E&F - Ground

Scale: 1:250
Date: 01/08/2016
Drawing No: PH2-GA-001-0110
Revision: A
Author: J.T.P. & Co.
Date: 01/08/2016



01/08/2016 177 Leven Road Leven DD18 1JF



Proposed Elevations - Building E&F - Elevation 9

← Building E & F →



مخطط 3: واجهات مبنى السكني الجديد - أحياء شرق الرياض



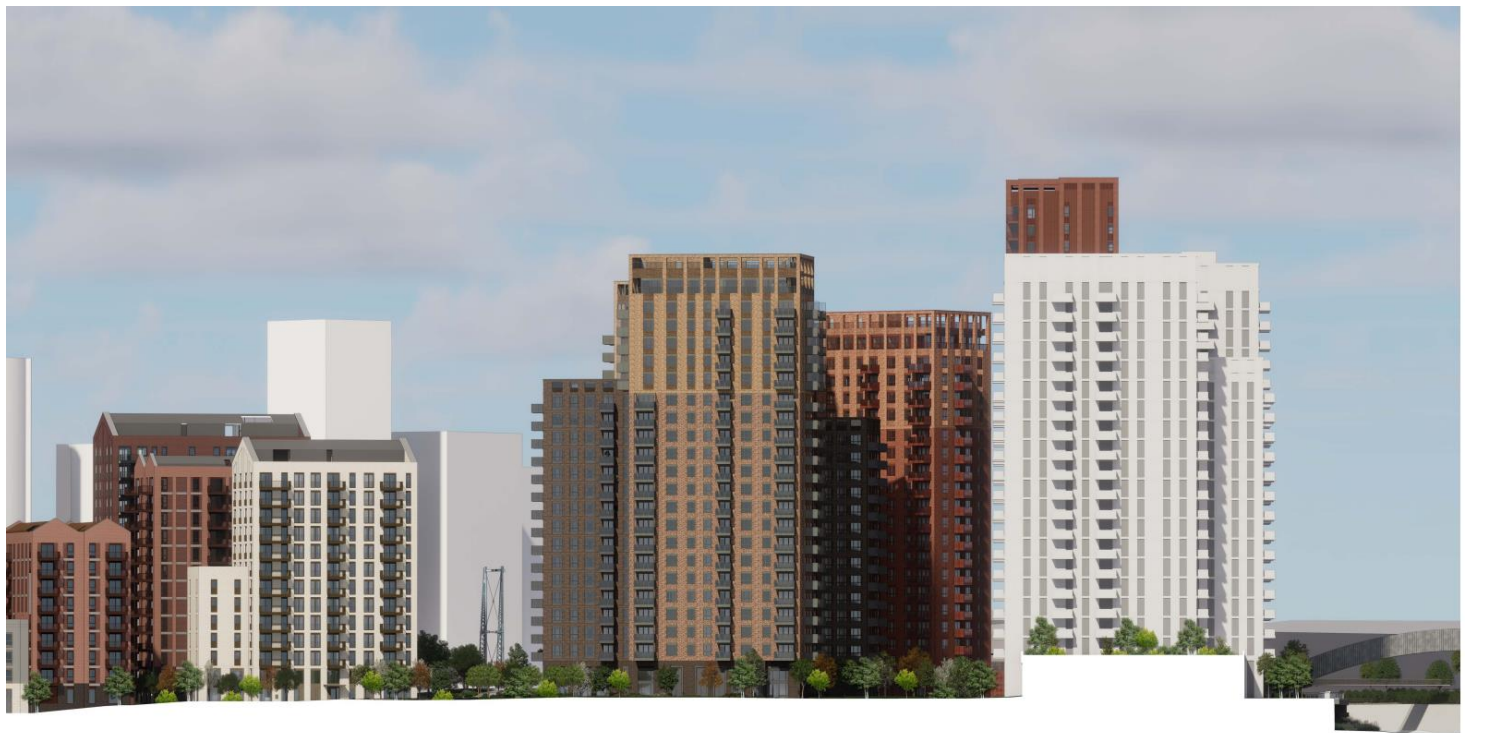
Proposed Elevations - Building E&F Ground Floor - Elevation 10 (East)



Proposed Elevations - Building E&F Ground Floor - Elevation 9 (West)



Indicative Southwest Site Wide Elevation



Phase 1 Riverside Phase 2 Phase 3 Phase 3 River Lea



View across the river towards Riverside Park and Blocks E, F and D



Indicative View towards Riverside Park



Typical Commercial Bay



Ancillary



Duplex



Lobby at the base of flats



Residents' Lounge



Cycle Parking



Podium A/B View - Looking West