

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

<b>Reference</b>	PA/24/00243/A1
<b>Site</b>	7 Brannan Street, London
<b>Ward</b>	Blackwall and Cubitt Town
<b>Proposal</b>	Redevelopment of the site to provide purpose built student accommodation with associated amenity space and Class E(a)(b) floorspace within a building of up to 46 storeys with basement; together with plant, car and cycle parking facilities, associated servicing, access and landscaping and all associated ancillary works and structures.

This application is accompanied by an Environmental Statement.

**Summary Recommendation** Grant planning permission with conditions and planning obligations

**Applicant** WW F1 Student Development Company Limited

**Architect/agent** Lead Architect: Glenn Howells Architects  
Landscape Architect: HTA  
Agent: DP9

**Case Officer** Nicholas Jehan

**Key dates**

- Application registered as valid on 13 March 2024
- First round of public consultation finished on 13 May 2024
- Additional information for Environmental statement submitted 27 September 2024
- EIA regulation 25 re-consultation finished on 1 November 2024

**EXECUTIVE SUMMARY**

The proposals seek to provide 912 new Purpose Built Student Accommodation bedrooms within a 46 storey tower building to be constructed on a currently undeveloped plot of the Wood Wharf outline planning permission which was originally granted in 2014.

Whilst that plot was originally approved to deliver standard C3 residential accommodation. However, to date, 3,334 homes have gained detailed consent through reserved matters approvals and all such homes are currently being delivered. This is set against a requirement to deliver a minimum of 1,700 homes under the development specification of the outline permission. Therefore, the Wood Wharf outline permission has delivered a significant quantum of housing and the applicant would be under no obligation to continue to deliver any further housing as part of that permission thereby ensuring that the delivery of student accommodation in place of residential would neither undermine nor compromise the supply of standard residential housing.

The introduction of an element of student accommodation to Wood Wharf is seen as a positive step towards ensuring the creation of a mixed and balanced community within the masterplan.

The proposed student accommodation would be of a high standard and would contribute 364 homes towards to the Borough's general housing targets. 35% of the rooms would be affordable and at least 51% of them would be subject to a nominations agreement to be secured via legal obligation.

The design of the building itself is of a high quality and would make a positive contribution to the surrounding area as well as longer range views. It would provide a high standard of residential amenity to those living inside, including communal amenity space which would be in excess of a similar standard residential space in terms of its size. New public realm would be provided at ground floor which would form a coherent part of the wider Wood Wharf masterplan and ensure that the building becomes a constituent part of it.

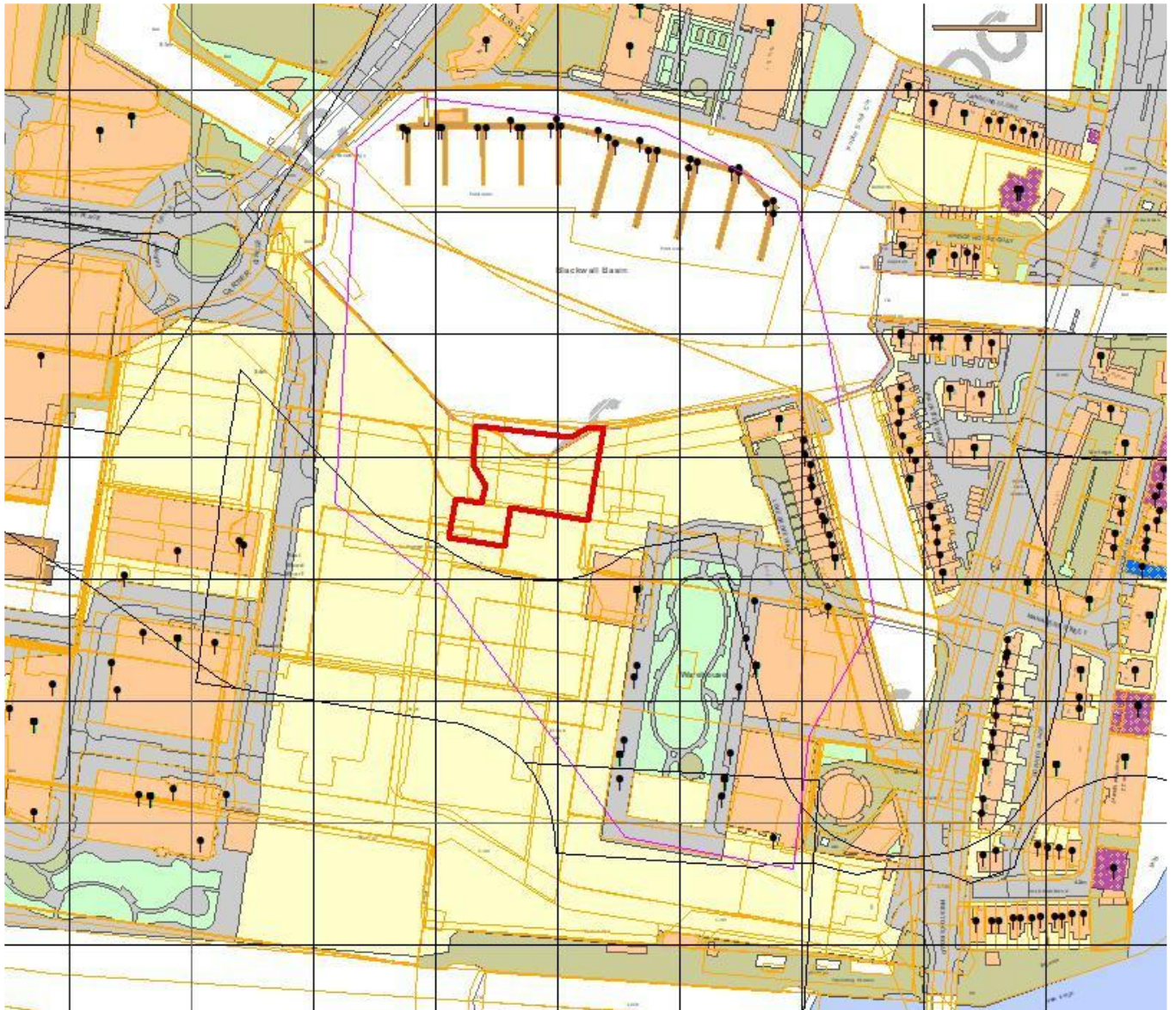
A retail space would be included within the ground floor to provide further activation of the building and provide an appropriate additional use.

Environmental impacts of the proposals are all considered to be acceptable subject to securing appropriate mitigation and enhancements via planning conditions.







The proposals will be car free, save for blue badge parking, and a significant quantum of cycle parking will be provided including free-to-hire cycles for students to use.

The proposals do not result in any unacceptable negative impacts on the amenity of neighbouring buildings, their occupants or public spaces. Any impacts arising from the proposals are expected to be reduced as compared to the impacts of a building which could be constructed in line with the approved parameters on this development plot.

The proposals represent a high quality, sustainable development which would contribute significantly to the Borough's aims of delivering managed growth and sharing the benefits of that growth.



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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/24/00243

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

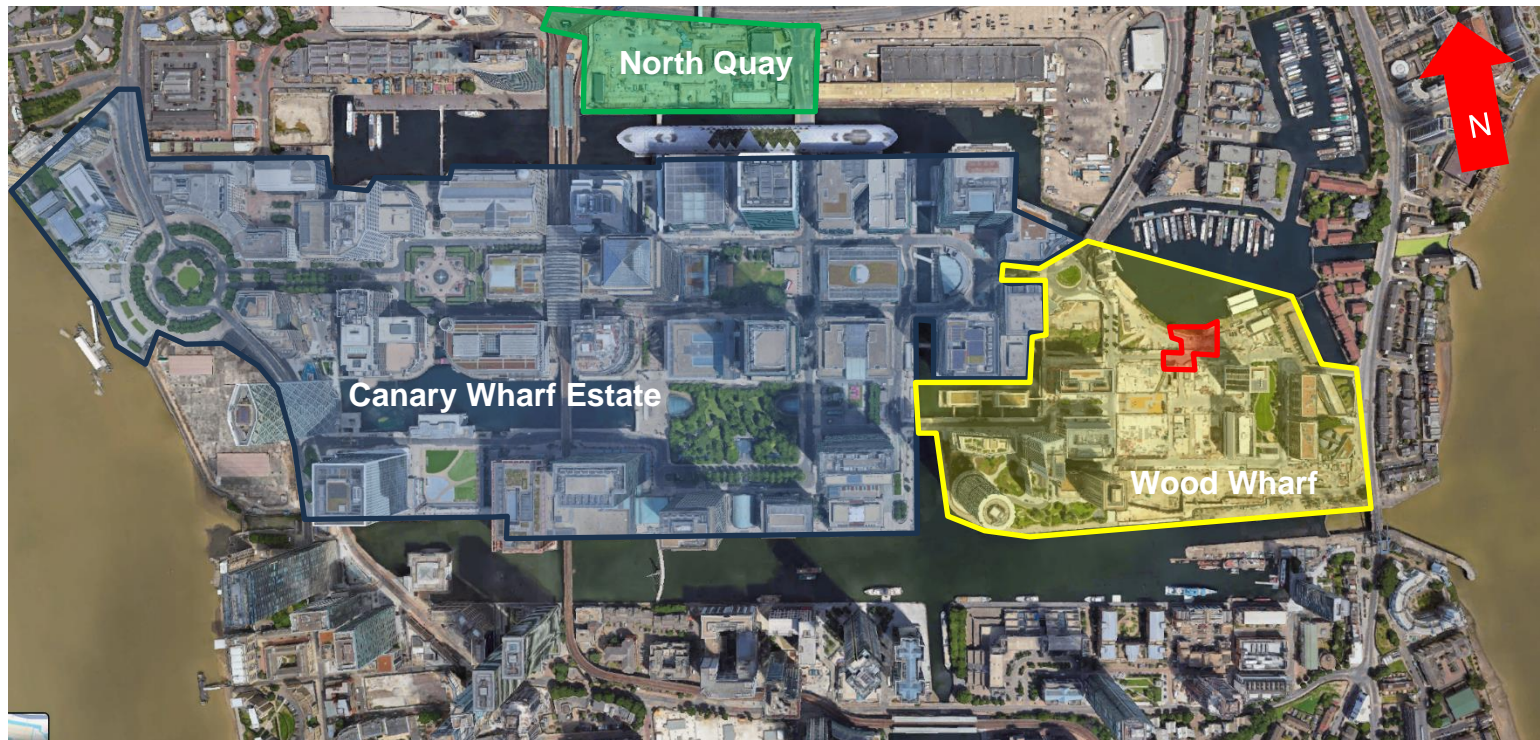


**London Borough  
of Tower Hamlets**

Scale : 50m grid squares

Date: 03 November 2024

## 1. SITE AND SURROUNDINGS



**Figure 1: Satellite image of site, highlighted in red, in its context.**

- 1.1 The application site, indicated in red in Figure 1 above, is located within Wood Wharf, a wide-ranging mixed-use masterplan development area to the east of the Canary Wharf Estate and within the majority ownership of Canary Wharf Group (the Wood Wharf Masterplan). Wood Wharf adjoins the Canary Wharf Estate on its western edge via Water Street and to the north via Charter Street. The northern edge of Wood Wharf is the Blackwall Basin and to the southern edge is South Dock. Wood Wharf is bounded to the east by Preston's Road.
- 1.2 The development specification approved with that outline permission was provided with a high degree of flexibility as to the final outcome of the development, which included a maximum deliverable floorspace of 728,880 sqm across a wide range of uses including between 165,000 and 350,000 sqm of office floorspace and between 1,700 and 3,610 new homes, to comply with the wide ranging requirements of the site allocation. A large majority of the outline permission has since been constructed or received detailed reserved matters approval with only a relatively small number of development plots remaining vacant. So far approximately 500,000sqm of floorspace has received detailed reserved matters approval under the original outline consent which includes 3,334 homes, all of which have either been constructed or are currently under construction.
- 1.3 The site itself relates to one of the development plots, Plot F1, established by the Wood Wharf Masterplan approved in December 2014 via an outline planning permission (reference PA/13/02966), as well as land surrounding that plot. Figure 2 below shows the approved development plots of the Wood Wharf Masterplan with the proposal site highlighted in red and development plots that have either been completed or are currently under construction highlighted in yellow.
- 1.4 As for the proposal site itself, Plot F1 sits at the centre of the southern edge of the Blackwall Basin and currently benefits from outline approval for a building of 190m AOD in height to provide commercial space at ground floor and C3 residential above, including affordable housing. The site is currently undeveloped, as can be seen in Figure 3, following demolition of the wider masterplan area prior to commencement of construction of the Wood Wharf masterplan. No application has been submitted to date to approve detailed reserved matters on the development plot.



**Figure 2: Wood Wharf Masterplan showing the proposal site approximately indicated in red and orange, with the orange section representing below ground works only. Buildings which have either completed or are currently under construction are indicated in yellow.**

- 1.5 To the east of the site is Plot F2 which is currently under construction to provide affordable rented housing. To the west of the site is Plot C1 which has yet to obtain detailed approval but, together with Union Square further to the south, has obtained temporary planning permission to provide new public realm which is intended to be delivered at the same time as the proposed scheme to provide a cohesive and extensive area of public realm whilst development on that plot comes forward. To the south of the site is plot G1 which is approaching completion and provides a mix of serviced apartments and Plot G3, otherwise known as 30 Harbord Square, which is occupied and provides intermediate housing.
- 1.6 The redline of the site straddles Brannan Street however permission is only sought for works below ground in that section of the site.
- 1.7 In terms of land use designations, the site is located within the Wood Wharf Site Allocation, which is an allocation with a priority for delivery of housing and a range of employment spaces, as well as the Central Activities Zone (Isle of Dogs Satellite), Canary Wharf Metropolitan Centre and the Canary Wharf Secondary Preferred Office Location. The site is also within the wider Isle of Dogs and South Poplar Opportunity Area.
- 1.8 The site is located in the Canary Wharf Cluster Tall Building Zone as well as the Canary Wharf Skyline of Strategic Importance. The proposal would also likely be visible in certain designated views as dealt with later in this report.
- 1.9 In terms of heritage, the site is not located within a conservation area. The Grade I Listed historic dock wall of the Blackwall Basin runs through part of the site. No other statutorily or locally listed buildings are within or within close proximity to the site. The site is within the Isle of Dogs Archaeological Priority Area which is rated as a Tier 3 area with archaeological potential.

- 1.10 Immediately to the north of the site is the Blackwall Basin which is a Site of Importance for Nature Conservation which is managed by the Canal and Rivers Trust. The site is also within Flood Risk Zone 3A.



**Figure 3: Image of Wood Wharf looking east from the upper floors of 15 Water Street (Plot B3) with the approximate extent of the above ground site indicated in red.**

## 2. PROPOSAL

- 2.1 The proposal relates to what is known as a “drop-in” application. That is to say that the proposals seek a new permission for a part of a site covered by an extant planning permission whilst the extant permission remains the governing consent for the rest of the development. These most often occur with regards to outline or phased planning permissions as the actual development period of these permissions often cover several years during which priorities and demand for different land uses change and issues such as building costs can change the viability of the extant planning permission halfway through the construction of the approved development.
- 2.2 In this case, the applicant is effectively seeking to introduce a new use to the Wood Wharf Masterplan by changing the use of the development which has been approved on Plot F1 from standard C3 residential to student accommodation. The application therefore seeks permission for a single 46 storey (plus two levels of basement) tower with a maximum height of +152.095m AOD which will provide 912 Purpose Built Student Accommodation (PBSA) bedrooms as well as amenity spaces for use by the occupants. The building would also include a modest retail space at ground floor level which will be within Use Class E(a) and (b) which covers retail and café/restaurant type uses. The overall floorspace measurements are set out in figure 4 below.

	<b>Floorspace GIA in sqm</b>
Overall Floorspace	32,947
Student Accommodation	29,461
Student Amenity Space (including external terrace)	3,471
Retail/Café	156
Public realm	930

**Figure 4: Floorspace by use**

- 2.3 35% equating to 320 of the PBSA rooms are proposed to be secured as affordable rooms. It is also proposed that at least 51% of the PBSA rooms will be subject to a nominations agreement.
- 2.4 The proposed building has a slightly different massing to that approved under the Wood Wharf Masterplan and so the applicant has submitted a new application rather than seek to vary the extant permission to allow the proposed use. However once constructed the building would form a constituent part of the wider Wood Wharf Masterplan having been designed to comply with the relevant design code and parameters where applicable and feasible. The basement of the building will also connect to the wider basement of the Wood Wharf Masterplan which was constructed at the beginning of the masterplan development.
- 2.5 The proposals also include new landscaped public realm spaces on each side of the building and a boardwalk area to the north of the building adjacent to the Blackwall Basin. Cycle parking is proposed within the basement of the building and blue badge parking will also be provided on Brannan Street. Servicing and deliveries would take place on Brannan Street which is a private highway.
- 2.6 The proposed PBSA rooms will be provided across a number of different types and sizes as set out in figure 5.

<b>Room type/size</b>	<b>Number of rooms</b>
C1 – Cluster room (13sqm)	280 (30.7%)
C2 – Cluster room (15sqm)	54 (5.92%)
C3 – Cluster room (16sqm)	84 (9.21%)
C4 – Accessible Cluster room (20sqm)	46 (5.04%)
S1 – Studio room (16sqm)	178 (19.52%)
S2 – Studio room (17-20sqm)	202 (22.15%)
S3 – Studio room (28sqm)	68 (7.46%)

**Figure 5: Breakdown of room types**

- 2.7 A CGI of the proposed building within the context of the emerging Wood Wharf Masterplan is included at Figure 6.



**Figure 6: CGI of proposed building in context. Plot F2 is shown to the left and C1 to the right. The Blackwall Basin is in the foreground.**

- 2.8 At the same time as the present application, the applicant has applied to vary the approved plans of the Wood Wharf Masterplan under s.73 of the Town and Country Planning Act 1990 (as amended) and to vary the relevant s.106 agreement (ref: PA/24/01371). The sole purpose of that application is a purely technical one. The proposed variation will remove the land, which is the subject of this application, from the scope of the Wood Wharf Masterplan in order to ensure that the planning permission granted to deliver the Wood Wharf Masterplan continues to survive following any grant of a permission for this application. The applicant would then be able to continue to lawfully deliver the remaining plots and approvals of the Wood Wharf Masterplan. This issue arises as a result of relatively recent caselaw (*Hillside Parks Ltd v Snowdonia National Park Authority* [2022] UKSC 30 as well as other subsequent cases).



Should permission be granted for the present application, as well as the s.73 application, the two applications would be intrinsically linked via a deed of variation to the original Wood Wharf Masterplan outline permission such that the remainder of the Masterplan could only continue to be implemented in accordance with the s.73 variation following implementation of the permission for the present proposals. That application is currently still being assessed but is capable of being determined via delegated authority and will therefore be determined appropriately in line with the Council's adopted scheme of delegation at a time when it can be determined.

### **3. RELEVANT PLANNING HISTORY**

#### Wood Wharf

3.1 The Wood Wharf Masterplan within which the application site is situated is subject to an overarching outline planning permission which was granted in 2014. That permission has been amended on several occasions and also has a large number of reserved matters applications and approvals of details associated with it all of which are relevant to the present application in some respect. The below is just a summary of the more pertinent applications to the current application to which particular attention needs to be drawn.

#### *Outline Permission*

3.2 PA/13/02966 - Outline application (all matters reserved) for mixed-use redevelopment of the site known as "Wood Wharf" comprising:

- Demolition of existing buildings and structures, including dwellings at Lovegrove Walk;
- The erection of buildings, including tall buildings and basements, comprising:
  - Residential units (Use Class C3);
  - Hotel (C1);
  - Business floorspace (B1);
  - Retail (A1-A5);
  - Community and Leisure (D1 and D2); and,
  - Sui Generis uses.
- Associated infrastructure, including the creation of structures in Blackwall Basin, Graving Dock, and South Dock;
- Streets, open spaces, landscaping and public realm;
- Bridge links;
- Car, motorcycle and bicycle parking spaces and servicing spaces;
- Utilities including energy centres and electricity substation(s); and,
- Other works incidental to the proposed development.

Permitted 24th December 2014

#### *Relevant Reserved Matters Applications*

3.3 PA/15/00019 – RM04 – Basement - Details of all reserved matters (Access, Appearance, Layout and Scale) pursuant to condition 4(b) of outline planning permission ref PA/13/02966 dated 24/12/2014 relating to the following areas of the Wood Wharf Masterplan: i. Basement and below ground infrastructure within Development Zone T Comprising 1,738 sqm (GIA) of retail and leisure uses (Use Class A1-A5, D1 and D2), 103,865 sqm (GIA) of ancillary infrastructure, utilities, parking and circulation.

Permitted 27 July 2015 and most recently amended 1 March 2023 (ref: PA/23/00212).

3.4 PA/22/00269/S – RM24 – Boardwalk - Details of all reserved matters (Access, Appearance, Landscaping, Layout and Scale) pursuant to outline planning permission ref. PA/13/02966 dated 24/12/2014 relating to the following areas of the Wood Wharf Masterplan: - Ground and above ground structures open space, landscaping and public realm to the north of Development Zone F and C. Comprising provision of a continuous boardwalk, on the new built edge to the south and west side of the Blackwall Basin.

Permitted 06 May 2022

*Other Relevant Applications*

- 3.5 PA/24/01371 – Section 73 amendment of Outline Permission - Variation of Condition 5 of Outline Planning Permission ref: PA/13/02966 and dated 19 December 2014. The application seeks to amend the approved Control Documents in order to "slot out" Development Plot F1 and surrounding land above and below ground.

Currently under consideration

- 3.6 PA/24/00383/NC – Union Square/Timber Quay – Provision of flexible retail use, event space, hard and soft landscaping, public realm, play spaces and all associated works and structures, for a period of up to five years.

Permitted 17 July 2024

Other Relevant Planning Applications outside of Wood Wharf

- 3.7 PA/20/01421 – North Quay – Application for outline planning permission (all matters reserved) for the redevelopment of the North Quay site for mixed use comprising: Demolition of existing buildings and structures; Erection of buildings and construction of basements; The following uses: - Business floorspace (B1) - Hotel/Service Apartments (C1) - Residential (C3) - Co-Living (C4/Sui Generis) - Student Housing (Sui Generis) - Retail (A1-A5) - Community and Leisure (D1 and D2) - Other Sui Generis Uses - Associated infrastructure, including a new deck over part of the existing dock; - Creation of streets, open spaces, hard and soft landscaping and public realm; - Creation of new vehicular accesses and associated works to Aspen Way, Upper Bank Street, Hertsmere Road and underneath Delta Junction; - Connections to the Aspen Way Footbridge and Crossrail Place (Canary Wharf Crossrail Station); - Car, motorcycle, bicycle parking spaces, servicing; - Utilities including energy centres and electricity substation(s); and - Other minor works incidental to the proposed development.

Permitted 02 March 2022

- 3.8 PA/24/00977 – North Quay Non-Material Amendment - Application for non-material amendment of planning permission dated 02/03/2022, ref: PA/20/01421. Non Material Amendment(s) Sought: Reduce the amount of consented student housing (Sui Generis) floorspace set out in the North Quay Development Specification

Currently under consideration

- 3.9 PA/20/02588/A1 – 30 Marsh Wall – Demolition of existing building and erection of a single building to provide student accommodation (Sui Generis Use) along with flexible retail / commercial floorspace (Use Class E), alterations to the public highway and public realm improvements.

Permitted 28 July 2022

- 3.10 PA/20/01402 – 2 Trafalgar Way – Redevelopment of the site to provide a new mixed use building including student accommodation units and associated uses (Sui Generis), residential units 80 (Class C3), office (Class B1), shops/cafes (Class A1/A3) and a restaurant/takeaway (Class A3/A5) arranged over a 4 storey podium with three taller elements of 46, 36 and 28 storeys (with roof-top plant and basements), alongside parking, landscaping, public realm and other associated works.

Permitted 30 June 2022

- 3.11 PA/21/02182 – Mulberry Place – A hybrid planning application for: Detailed planning application for works to include: Demolition of existing buildings and structures and the phased erection of buildings, comprising: Residential Build to Rent Homes (Use Class C3); Student

Accommodation and ancillary facilities (Sui Generis); Flexible Commercial Floorspace (Use Class E); Alterations to the Listed Dock Wall and Dock Gardens to provide new pedestrian connections and improved access; Alterations to the existing access road; Associated improvements to streets, open spaces, landscaping and public realm; and Provision of car and bicycle parking spaces and servicing spaces and other works incidental to the proposed development. For the purposes of consultation - The Detailed Phase of the application will include buildings of 30 storeys (102.3 AOD) and 36 storeys (113.7 AOD) delivering 150 Homes and 716 Student Bedrooms. Outline planning application (all matters reserved) for the balance of the site for: Demolition of existing buildings and structures; The phased erection of buildings for use as a Data Centre (Use Class B8), Flexible Creative Workspace (Use Class E(g)), Community Space (Class F2), and/or a Swimming Pool (Class F2); and associated infrastructure; streets, open spaces, landscaping and public realm; car and bicycle parking spaces and servicing spaces; Utilities including electricity substations; and other works incidental to the proposed development.

Allowed at Appeal 01 December 2023

- 3.12 PA/24/00812 – Orchard Wharf – Full phased planning application for redevelopment of the site following demolition of all existing buildings and structures and enabling works to provide a mixed-use development consisting of basement excavation, and the erection of new buildings connected to or situated above a safeguarded wharf box which would deliver: i. Purpose Built Student Accommodation (Sui Generis) and ancillary accommodation; ii. Residential dwellings (Use Class C3) and ancillary accommodation; iii. General Industrial / Storage or Distribution floorspace (Use Classes B2 / B8 / E(g)(iii)) and ancillary accommodation within the safeguarded wharf box; iv. External infrastructure and all other related works (including marine works) for waterborne freight handling; and v. Flexible commercial (Use Class E) and community floorspace (Use Class F). Other associated works to include the provision of hard and soft landscaping; private internal and external amenity space; vehicular access and servicing facilities; provision of car parking and cycle parking; plant and other associated works incidental to the proposals including works to the River Wall.

Currently under consideration

- 3.13 PA/24/01241 – One Canada Square (48<sup>th</sup> and 49<sup>th</sup> Floor) - Change of use from Use Class E(g)(i) (Office) to Flexible Use Class F1 (Learning and Non-Residential Institution) or Use Class E (g)(i) (Office)

Currently under consideration

- 3.14 PA/19/02217 – One Canada Square - Change of use (50th Floor) from Office (Use Class B1) to Non-Residential Institution (Use Class D1).

Permitted 28 January 2020

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

- 4.1 The applicant undertook its own public engagement and consultation process during August and September 2022, shortly before the submission of the planning application. This involved consultation with local stakeholders, residents of Wood Wharf and people working in Wood Wharf and Canary Wharf.
- 4.2 The application was consulted upon by the Council in line with statutory obligations and the adopted Statement of Community Involvement. As part of this site notices were erected near the site in three locations, a press notice was published, and 294 letters were sent out directly to nearby residents and other occupants. A second round of consultation was undertaken following receipt of additional information relating to the Environmental Statement accompanying the application under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 4.3 A total of 2 representations were received, both of which were in objection to the application.
- 4.4 The points raised within those objections were as follows:

- The scheme is stated as providing car parking which is not required given high level of public transport access and car parking is not provided in other buildings in the estate.
- Concerns raised that residents in nearby temporary accommodation being provided in Lovegrove Walk require reassurance that they will not lose their homes or be negatively impacted.

4.5 Officers note that the only car parking being provided is blue badge parking which is in line with policies and the Lovegrove Walk properties were already approved to be demolished as part of the wider Wood Wharf Masterplan but do not actually form part of the site for the present application.

## 5. CONSULTATION RESPONSES

5.1 The application was submitted to the following consultees for comment and comments received are summarised below

### **Canal and River Trust**

The Canal and River Trust have requested conditions to deal with Landscaping details and informatives relating to working in/around C&RT assets, such as the Blackwall Basin.

They also raised specific queries relating to:

Biodiversity – the Statutory Biodiversity Net Gain Metric should include a 10% net gain in Watercourse Units to the Blackwall Basin.

Lighting – the lighting strategy should ensure that light spill to the basin is limited to avoid impacts to the bats and the waterspace.

Surface water drainage – any discharge to the Blackwall basin requires agreement of the Trust.

Landscaping – queries raised relating to interpretation of the historic Junction Dock and how this is to be incorporated within the landscaping, location of child playspace and conflict with servicing vehicles and a potential floating planter within the Basin.

Daylight and sunlight impacts – query relating to the impact of the proposals on the daylight and sunlight access of the houseboats on the northern side of the Blackwall Basin and how this is being addressed.

### **Environment Agency**

No objection.

### **Historic England**

Advised that they have no comments to make, and to refer to LPA Conservation Officer for guidance in determining the application

### **Greater London Archaeological Advisory Service (GLAAS)**

No objection subject to securing appropriate archaeological investigation condition.

### **Greater London Authority**

As highlighted in their Stage 1 Response, the GLA is generally supportive of the proposed scheme. They have made the following comments and observations which are of particular note:

#### *Student Accommodation*

The proposed development would provide PBSA accommodation comprising 912 student bedrooms. The student accommodation would meet identified strategic need and contribute towards the housing targets for the Isle of Dogs OA in policy SD1 and Tower Hamlets in Policy H1. The PBSA accommodation would be provided across clusters and studios. The

development site would form part of the Wood Wharf Masterplan which is a mixed-use development and would contribute to a mixed and inclusive neighbourhood. The development would provide over 3,471 sq.m of amenity space which equates to 3.8 sq.m per bedroom. The proposed amenity spaces are dispersed throughout the building and provide good quality functional living spaces. The Student Management Plan also sets out other matters including maintenance, fire safety, and arrivals and departures. A Management Plan should be appropriately secured. A letter has been provided from UCL which outlines their interest and support in the accommodation, with a nominations agreement being explored. The application confirms that a majority of the bedrooms will be secured under a nomination agreement, including all of the affordable student accommodation. This must be appropriately secured within the legal agreement along with the use by students. Subject to a nomination agreement, appropriate occupation restrictions being secured, affordability levels and an early-stage review mechanism, the principle of the use of the land for student accommodation is acceptable.

#### *Affordable Accommodation*

The proposed development would deliver 35.1% of bedrooms as affordable accommodation. The affordable provision should be calculated on a habitable room and floorspace basis.

#### *Design*

The building footprint, which takes up the majority of the application site, is similar to the footprint of the building within the outline consent and is supported. The location and layout of the student and retail entrancing and ground floor uses would create strong activation that relates positively with the public realm and supports legibility.

The proposal lies within the Canary Wharf Cluster an area identified as appropriate for tall buildings. The proposed development would extend up to 145.6m (152m AOD) and would meet the definition of a tall building. The site allocation doesn't set out a height limit for buildings, although the Wood Wharf masterplan contained development parameters for the site up to 190m AOD. As the site is identified as a potentially suitable location for a tall building within the local plan, the proposals meet the locational requirements of D9. In terms of visual impacts, the developments simple orthogonal proportions would result in a slender silhouette that would contribute positively to the existing and emerging cluster. Given that the proposed development is lower in height than the current outline permission, the visual impact of this development would be reduced compared to the approved development parameters. The building would be seen in the wider cluster of tall buildings and would be acceptable in LVMF views, as discussed below.

In terms of functional impacts, the proposed design, layout, servicing, maintenance and management are broadly supported, and the capacity of the area is sufficient to accommodate the quantum of development. As such, the functional impacts of the proposed tall buildings are acceptable

In summary, the proposal complies with the locational requirements of Policy D9(B), and the visual and functional impacts of the development are acceptable. Conclusions on compliance with the qualitative assessment set out in Policy page 7 D9(C) and compliance with London Plan Policy D9 overall will be made at the Mayor's decision making stage.

#### *Views*

The site lies within LVMF Panorama 4A.1 'Primrose Hill: the summit – looking toward the Palace of Westminster'. A Visual Impact Study (VIS) accompanies the planning submission and demonstrates that the proposal would not be visible in this view and as such there would be no impact. The site also lies within Panorama 5A.1 'Greenwich Park: the General Wolfe Statue – at the orientation board'. The VIS shows that the upper portion of the building would be visible in the backdrop of Dollar Bay Court and 30 Harbord Square, rising above both buildings. The proposal would also be visible in the cumulative view however Plot J1/J3, currently under construction, would be seen in front of the proposal partially obscuring the west corner of the proposal. LVMF management guidance for the view seeks the 'incremental consolidation of the clusters of taller buildings on the Isle of Dogs and the City of London...any

consolidation of clustering of taller buildings on the Isle of Dogs needs to consider how the significance of the axis from the Royal Observatory towards Queen Mary's House could be appreciated' (p.69). The proposal would be seen to the right of the view within the backdrop of existing and approved tall buildings. The consolidation of this group of taller building would not appear dominant in the view or detract from the setting of the axial view.

### *Architectural Quality*

The proposal would have a clear tripartite composition comprising base, middle and crown. The two-storey glazed base of the building would relate well to the human scale and the internal activity would animate and liven the public realm. Overall, the form and articulation of the top of the building would contribute positively to the skyline. The proposed colour palette and use of silver, mid-grey and dark grey, which provides contrast, and the use of metal panels are broadly supported. Further consideration should be given to the overall depth of the elevations, with the metal panels and shallow window reveals resulting in a flatness to the elevations. The applicant should also ensure that the smooth metal panelling is not highly reflective in its appearance.

### *Fire Safety*

A Fire Statement has been prepared by a third-party suitability qualified assessor accompanies the application. The Fire Statement covers a range of matters including building construction, means of escape, fire safety measures, emergency services access and facilities and firefighting and evacuation lifts. The building is over 18m and would be provided with two staircases. The proposals would meet the requirements of London Plan policies D12 and D5.

### *Inclusive Access*

The development would provide 15% accessible rooms in accordance with London Plan Policy E10. Only 5% of this would be provided from the outset, with the further 10% provided if required. The accessible provision should be provided from the outset and should be appropriately secured in the legal agreement.

### *Heritage*

Whilst the site includes part of the edge of Blackwall Basin, which is Grade I listed, the Environmental Statement confirms that no direct works to the fabric of the dock walls are proposed as part of the development. The development would result in a low to very low level of less than substantial harm to nearby designated heritage assets. As harm has been identified, the proposals do not comply with London Plan Policy HC1, and officers attach considerable importance and weight to the harm identified. In accordance with paragraph 208 of the NPPF, the harm must be demonstrably outweighed by page 10 public benefits. Once the final package of public benefits is agreed, the final balancing exercise will be carried out at Stage 2. However, if the public benefits which includes the proposed affordable student accommodation are adequately secured, then the public benefits would clearly and convincingly outweigh the harm.

### *Transport*

See TFL comments below.

### *Sustainability*

The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full.

Be Lean – further exploration of energy efficiency measures for the nondomestic element and re-modelling as per GLA guidance;

Be Clean – demonstration of active two way correspondence with the Barkentine network operator;

Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the potential for PV and details of the proposed air source heat pumps;

Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;

Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

Carbon Offset required to be secured by s106 agreement.

Whole Life-cycle Carbon and Circular Economy provisions to be secured by condition. Further information on Circular Economy Design Principles, operational waste management and an end-of life strategy required.

A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

[Officers note that the proposal site is located within the Wood Wharf Masterplan area where new residential developments have been constructed and are currently being constructed with such digital infrastructure having been introduced within the Masterplan already. Officers are therefore satisfied that a condition is not reasonable or necessary in this instance as the site is clearly capable of making such a connection.]

#### *Environmental issues*

The proposed Urban Greening Factor (UGF) score of 0.16 falls below the requirements within Policy G5 of the London Plan which is 0.4. The applicant has stated that the wider Wood Wharf masterplan would achieve a UGF score of 0.4. Whilst this is acknowledged, the development must maximise opportunities for greening within the application site.

The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding. When mitigation measures are considered, the residual flood risk to the site is low. The FRA provided for the proposed development generally complies with The London Plan Policy SI.12. In terms of SuDS, the drainage strategy proposes blue/ brown roofs and tree pits, which is welcomed. The drainage strategy proposes to discharge at a rate of 55.3 l/s for the 100-year event plus 40% climate change. This is much higher than the Qbar greenfield runoff rate of 0.7 l/s. However, given the runoff is being discharged to the docks and both the EA and the Canal & River Trust (CRT) have agreed in principle to this approach, this is supported. No attenuation is provided for the site on the basis that runoff is discharged at an unrestricted rate into the docks. Attenuation is not required for this development in principle as water is being discharged to the docks at an unrestricted rate. Water efficient fittings, leak detection and water monitoring systems are proposed, which is welcomed. The water efficiency targets set out in London Plan Policy SI 5 must be appropriately secured.

An Air Quality Assessment has been provided with the application, which includes a dust risk assessment, air quality neutral and air quality positive. The site is determined to be medium risk for dust risk, and appropriate mitigation has been included. The proposals would be air quality neutral. The development would therefore be acceptable.

London Plan Policy G6 states proposals that create new or improved habitats that result in positive gains for biodiversity, should be considered positively and that development proposals should aim to secure net biodiversity gain and that biodiversity trading rules should also be satisfied. The proposed development would achieve a net biodiversity gain of 138.7% and satisfies the trading rules.

#### **Health and Safety Executive (Gateway One)**

No objection.

## **Isle of Dogs Neighbourhood Planning Forum**

No comments received.

## **London Borough of Greenwich**

No objection.

## **London Borough of Lewisham**

No comments received.

## **London Borough of Newham**

No comments received.

## **London Borough of Southwark**

No comments to make.

## **London City Airport**

No objection, subject to conditions, which will be attached to any forthcoming consent

## **London Fire Brigade**

Raised initial concerns regarding the compartmentation of the two staircases. Queries also raised in relation to access and facilities for fire and access service and storage of electric cycles in the cycle store and the fire risks involved. Concerns subsequently addressed and the LFB have confirmed that they have no objection to the proposals.

## **London Underground Infrastructure Protection**

No objection subject to securing conditions ensuring the protection of underground assets.

## **Metropolitan Police – Crime Prevention**

Requested further engagement with the applicant team as to SBD measures.

[Officer Note: Officers have included a standard Secure By Design condition to ensure that engagement takes place and the development achieves requisite SBD standards.]

## **NATS**

No response received.

## **Natural England**

No objection.

## **Thames Water**

No response received

[Officer Note: Whilst no response was received from Thames Water, officers are recommended a standard condition in relation to piling within a certain distance from Thames Water Assets.]

## **Transport for London**

### Healthy Streets Transport Assessment

The applicant has completed an Active Travel Zone (ATZ) assessment of six key routes within the vicinity of the site. TfL strongly recommends that 'hours of darkness' assessment is also undertaken to complement the above finding, paying particular attention to Healthy Streets criteria 'People feel Safe'. This supports the Mayor's Strategy to Reduce Violence Against



Women and Girls. In addition to the above, TfL strongly recommends that the highway works identified in the ATZ assessment are secured as part of any permission in line with London Plan policy T2. With the masterplan consent, £500,000 was secured towards pedestrian improvement works, payable in two tranches. Tower Hamlets Council should therefore consider whether a proportional contribution triggered by this development is necessary.

The applicant has completed an Active Travel Zone (ATZ) assessment of six key routes within the vicinity of the site.

The applicant has completed two-day time ATZ assessments on separate days and times. The ATZ was made up of six routes, in order to route the key destinations, they cover include; bus stops, St Johns Park ( greenspace ), National Cycle Route 1, Poplar DLR Station, Chrisp Street ( food and retail market ), Canary Wharf Station.

TfL request the applicant adds a route to the UCL School of Management, TfL note that a nomination agreement is being explored with UCL and therefore believe this is a key destination for the ATZ.

For Route 1 to Billingsgate bus stop's the lowest scoring section was at Cartier Circle roundabout, characterised by inconsistent dropped kerbs and tactile paving at crossings and therefore improvements to these crossings would be a considered measure.

Route 2 to St John's Park south of the site lowest scoring section was across Blue Bridge, noting that the issues with narrow footways are related to current construction conditions and will improve once the Wood Wharf Charter Street junction works are completed. Routes 3 and 4 only require minor improvements. For Route 3, footway improvements are being proposed along Marsh Wall there are some inconsistencies with quality of footway and material. Route 4 to Poplar DLR Station, lowest scoring section was on Upper Bank Street, whereby reducing street clutter would enhance the indicator 'people feel relaxed'.

Route 5 to Chrisp Street includes an underpass across Preston's Road, where graffiti, lighting concerns and overgrown vegetation is identified. In order to address Healthy Streets indicator 'people feel safe' a redesign of the underpass with better lighting ( to be reviewed in the night ATZ ), visibility with removal of vegetation and addition of local artwork could enhance the pedestrian experience along this route.

Route 6 to Canary Wharf station require no improvements in the assessment, however this route should not be discounted from the nighttime ATZ that is required.

Once the requested night-time ATZ has been completed any further mitigation identified should be secured as part of any permission in line with LP policies T2 and T4.

[Officer note: The updated ATZ has been received and appropriately highlights mitigation.]

### Public Transport Impact Assessment

A trip generation exercise has been undertaken using trip rates and mode share derived from only one survey which is not best practice.

The mode share could be further refined through the identification of a place of education to be linked to the permission by nomination agreement, it is noted that University College London (UCL) has expressed interest in a nomination agreement with the site.

However, TfL agrees these development proposals are commensurate with those for plot F1 within the Wood Wharf OPP and that the proposals are acceptable in strategic transport terms subject to the details below being addressed and a suite of management documents being secured as part of any new permission; alongside any site-specific active travel mitigation. The Council should also ensure that a bus contribution, proportionate to that secured with the Wood Wharf masterplan consent, is secured through the section 106 agreement.

It is noted that the baseline mode share for cycling is just 5%; – an increase in cycling mode share should be secured via the travel plan.

The proposed trip generation for the PBSA delivery and servicing aspect, it is proposed there will be 15 car / HGV deliveries, nine motorcycle deliveries and seven bike deliveries.

### Infrastructure Protection

Due to the proximity of the Jubilee Line to the development site, TfL note that Infrastructure Protection have contacted the LBTH and request that the response provided is adhered to throughout all phases of development and future issues are raised with Infrastructure Protection directly.

### Car Parking

TfL welcomes that the site is proposed to be car free, in line with London Plan policy T6.1E, with the exception of two blue badge parking spaces, one for the PBSA use and one for the ground floor retail, both with Electric Vehicle Charging Points (EVCP). This element of the proposals meets the London Plan policy T6 but to ensure the car free aspect is adhered to occupiers should not be eligible for any on street parking permits on either the Canary Wharf Estate or the Council highway.

The blue badge parking bays will be located on the northern side of Brannan Street, south of the site, forming part of the Wood Wharf Masterplan.

A Parking Design and Management Plan must be submitted with the application, to demonstrate how once standards are met in terms of blue badge parking, how a further 7% extra blue badge spaces can be allocated if future demand means existing provision is insufficient and therefore additional parking spaces are required.

### Cycle Parking

#### *Access*

Access for the cycle parking will be located from the western side of the building on the ground floor via stairs with a wheeling ramp as an alternative means to the two cycle lifts being provided. The dimensions of the cycle lift should be confirmed. TfL queries the cycle lift dimensions being 2.3 metres x 1.2 metres being London Cycle Design Standards (LCDS) given it details dimensions should be 1.2 metres x 2.3 metres.

Accessing the cycle parking should involve the passing through no more than two doors, in line with the LCDS, with a recommended minimum external door width of 2 metres – plans demonstrating this should be provided. The access to the northeastern / eastern cycle stores does not appear to comply to LCDS standards, it appears there are three / four doors to access some of the stores, as well as the cycle workshop. Door widths should also be confirmed.

The long stay cycle parking will be located within Basement Level 02, with separate stores for the private bikes and free to hire bikes. It also includes a cycle workshop room for repairs this is supported by TfL.

#### *Quantum*

Cycle parking is proposed non-compliant to the quantum required by London Plan policy T5. Instead, 50% of London Plan standards and 50% 'free to hire' bikes available for students are proposed. This results in 228 free to hire and 228 standard private cycle spaces.

Acceptability of this approach would be dependent on any permission including mechanism for monitoring and converting the hire bike spaces to permanent spaces should demand arise; alongside an obligation for the applicant to maintain and replace any missing or damaged bicycles in perpetuity.

Regarding short stay, 16 Sheffield Stands will be provided within the public realm, with 24 spaces allocated to the PBSA use, located east of the building and 9 spaces for the retail use. This meets London Plan policy T5 and is therefore acceptable.

#### *Design*

The proposals for long stay state that design will be in line with London Plan standards however TfL requests detailed comments on the mix of cycle parking and how the design needs to be amended to meet the LCDS Chapter 8. This includes aisle width, space requirements between stands etc.

The design of the cycle parking is welcomed by TfL with 5% of spaces in free to hire and standard stores being for larger / adapted cycles, and a further 5% being standard Sheffield Stands, in line with London Plan standards.

However, for the remaining 90% of the cycle parking, all are proposed to be two tiers across both types of the stores. TfL recommends a better mix, a maximum of 75% two tier, 20% Sheffield and 5% for larger / adapted cycles, this enables accessibility for all to use and mitigate any issues with safety when removing a bike.

### *Cycle hire*

The applicant has proposed that the Cycle Hire docking station proposed to the east of the site as part of the Masterplan is relocated to the south of the site.

Subject to detailed design and location plans, further discussion with TfL cycle hire will be required and this must be secured in the section 106 agreement. Agreement in principle should be established prior to determination.

### Delivery and Servicing Plan

Vehicle access to the site will be from Brannan Street, running south of the site, upon completion vehicles will be able to access the site from Preston's Road to the east and exit onto Preston's Road via Lovegrove Walk one way link. Vehicles travelling to and from the site to the east will be able to access Brannan Street via Charter Street / Preston's Road junction.

The applicant should promote sustainable deliveries and it is recommended that that facilities for cargo bike deliveries are provided.

One loading bay has already been provided on the northern side of Brannan Street adjacent to the site as part of the Wood Wharf Masterplan. This will be the loading bay for the site, as well as for student moving in and out days and to service both the PBSA units and retail aspects. The loading bay for both uses is proposed to be on-street, although strategic transport policy requires on-site space, it is noted that the on-street arrangement is consistent with the Wood Wharf OPP masterplan and would fall under the wider management of the Canary Wharf Estate.

Cargo bike deliveries must be promoted in line with sustainable delivery strategies in London Plan T7. Three deliveries are expected a day for the retail use. Given the nature of the scheme, the trip generation for deliveries should include informal, ad hoc deliveries.

An outline delivery and servicing plan (DSP) has been submitted including measures to manage and minimise impacts of these movements, including use of booking systems and consolidation. The final DSP should be secured as part of any permission in accordance with London Plan policy T7.

### Travel Plan

A framework PBSA Travel Plan has been submitted. The aims and targets contained within the plan form an acceptable basis for planning – outlining how active travel in particular would be promoted and travel patterns monitored post occupation.

Comprehensive travel surveys will be condition within the first 6 months of occupation / 75% of occupation, to gauge a better understanding of how the students and visitors will be travelling to and from the site.

The student mode share 3rd year target for cycling is 8%, this is a disappointing figure, by the 3rd year targets should be higher in promotion of active travel and how 50% of the bikes are

free to hire, TfL would expect a more ambitious cycling mode share target within the travel plan. The detailed Travel Plan should address this.

Any methods for promotion of active travel included in the Travel Plan are welcomed by TfL in line with London Plan policy T1; please quote the inner London figure and LoD OAPF higher mode share target which is 90% of all trips should be made by foot, cycle or public transport by 2041

The final Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement in line with London Plan policy T4.

### Student Management Plan

A Student Management Plan has been submitted; this includes detail about how arrivals and departures will be managed.

Check in to the PBSA will be spread across the month September of each year and check out at the end of the university year. Students arriving by car will be allocated a time slot, whereby the loading bay will be suspended to the public to ensure use is limited to the arrivals. The plan states a staff member will be marshalling the bay, which is supported by TfL in order to mitigate any issues with queuing on nearby road networks.

The final plan should be secured as part of any permission to manage and minimise the impacts of these movements and promote sustainable travel at the start and end of terms.

### Construction

An outline Construction Environmental Management Plan (CEMP) has been submitted, as well as an Outline Construction Logistics Plan (CLP) and the principles of this are acceptable and again consistent with the wider Wood Wharf OPP. The full CLP should be secured by condition, in accordance with London Plan policy T7.

This should include vehicle numbers, routings, holding bays, consolidation, pit lanes, any impact on bus network or strategic cycle lanes.

To reduce road danger the applicant must ensure association with at least silver or gold Construction Logistics and Community Safety ( CLOCS ) and Fleet Operator Recognition Scheme ( FORS ). This falls in line with London Plan Policy T7 10.7.7.

Secondly, with the aspirations of Vision Zero the applicant should comply to Direct Vision Standard 3.

The full CLP should be secured by condition, in accordance with London Plan policy T7.

### **Port of London Authority**

We would like to see a clearer strategy to prioritise the use of the River through the supply chain for the transportation of construction and waste, in accordance with policy SI15 of the London Plan and Policies S.OWS2 and D.TR4 of Tower Hamlets Local Plan. The Outline Delivery and Servicing Plans provides some reference to river transport within the waste management plan; however, further consideration of the construction phase should be provided. Water transport is recognised as one of the most sustainable modes for freight movement and therefore due consideration must be given to help displace HGV movements from the local highway where possible, to reduce the carbon footprint and maximise the use of the river. Detail on how to maximise the use of the river for the transport of construction and waste materials to and from the site should therefore be agreed as a condition on any forthcoming planning permission. In addition to the policies referred, further guidance can be found on the PLA website <https://www.pla.co.uk/Planning/Use-of-the-Tidal-Thames-A-PracticalGuide-for-Local-Authorities-and-Developers>.

Although referred in the Outline Framework Travel Plan, the Planning Statement does not include riverbus services within the summary of Transport and Access to the Site. As noted, the Thames Clipper operates river services from Canary Wharf; however, this has not been

included in the 'Target Mode Share' analysis, nor within the Travel Action Plan. It is considered important that targets for river use are set out alongside measures to encourage use, in compliance with Policies S.OWS2 and S.TR1 of the Local Plan. Timetables for the Thames Clipper service should also be provided to residents along with the bus and rail information.

Within the Flood Risk Assessment (FRA), it is noted within the proposed surface water drainage strategy (Section 5.2), that runoff will be discharged into the Docks where possible, which is considered to be low in contaminants. The maintenance and review of efficiency of the drainage network is important to ensure that the wider water health is not jeopardised during construction or as a result of development. This is a matter to be agreed with the CRT as discussed in the report.

## **LBTH Energy & Sustainability**

The applicant has submitted an Energy Statement (Chapmanbdsp – October 2024) and a Sustainability Statement (Introba – February 2024 ) which sets out the proposals to reduce energy demand and deliver a sustainable scheme in accordance with policy requirements for D.ES7.

Key takeaways for the scheme are:

- energy efficiency measures – thermal fabric performance levels supported, principally in line with evolving LBTH New Local Plan recommendations, with anticipated space heating at 7 kWh/m<sup>2</sup>/yr.
- efficient heating through air source heat pumps are being proposed in the form of a (centralised) ASHP ambient loop system 'Space heating in the bedrooms is provided by small thermostatically controlled radiators served by low pressure hot water generated by on floor water to water heat pumps.'
- No renewables are proposed – applicants' comments: 'The provision of PV on the roof area would be tokenistic due to the amount of space available on the roof which is remaining after the subtraction of access routes, plant, and green roof. Application of PV in this area, approximately 82 sqm, will not be able to allocate more than 5 kWp considering the wiring requirements to connect the PV on the basement central cupboard over 140 m away will not make any carbon or commercial viability for this proposal.' In this instance it is accepted that no renewable energy generating technologies will be included. The proposed scheme has the following CO<sub>2</sub> emission profile:
  - Baseline – 125.1 tonnes CO<sub>2</sub> per annum
  - Proposed – 88.8 tonnes CO<sub>2</sub> per annum The total on-site site wide CO<sub>2</sub> emission reduction is anticipated to be 29% against the building regulation baseline. This is below the 45% reduction target of policy D.ES7, however the proposed carbon saving is supported as the scheme is in accordance with the GLA energy use intensity targets (EUI – 50.79 kWh/m<sup>2</sup>/yr against policy requirements of <55).

In addition, the scheme is proposing to meet net zero policy D.ES7 requirements through a carbon offset contribution. The proposals are for a 36.3 tonnes/CO<sub>2</sub> reduction in on-site emissions and would result in a carbon offsetting contribution of £ £253,066 to offset the remaining 88.8 tonnes CO<sub>2</sub> and achieve net zero carbon.

The applicant has provided a commitment that the development is designed to allow future connection to a district heating network. This should include a single point of connection to the district heating network. Drawings have been provided demonstrating space for heat exchangers in the energy centre. The applicant should also demonstrate a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors. This requirement is to be secured through a suitable condition or legal wording.

The submitted Sustainability Statement includes the BREEAM preliminary assessment and show the scheme is currently designed to achieve a BREEAM Outstanding rating. This is

supported. In relation to embodied carbon and whole life carbon the upfront (A1-A5) embodied carbon is identified as 423 kgCO<sub>2</sub>e/m<sup>2</sup> while the WLC (A1-A5, B1, B4, C2-C4) is identified as 843 kgCO<sub>2</sub>e/m<sup>2</sup>. These are supported and similar to GLA aspirational targets and LETI 2020 design guides limits of 500 and 800 respectively.

If the proposals are recommended for approval, the requirement is to be secured through suitable conditions or legal wording are:

- The carbon savings are delivered as identified in the Energy Statement
- Post completion report (including As Built calculations) is submitted to demonstrate energy / CO<sub>2</sub> savings have been delivered.
- District network future proofing commitment to demonstrate a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors.
- BREEAM Outstanding
- Carbon Offsetting contribution is secured (£253,066).

## **LBTH Environmental Health**

### *Noise*

No objections subject to securing conditions.

### *Air Quality*

No objections subject to securing conditions.

### *Land Contamination*

No objections subject to securing conditions.

## **LBTH Transportation & Highways**

### *Servicing*

A development of this scale will attract additional servicing and delivery trips. The SMP technical notes states that a servicing/deliveries will primarily be made up of post, refuse collections and maintenance vehicles. With 912 student units there consideration must also be given to other deliveries (groceries, food, online shopping, etc...). Whilst it can be argued that these vehicles are already on the highway network this site will see an intensification of vehicular trips in the location surrounding the site. The site is not located on or immediately adjacent to the Public Highway so impacts on the LBTH Highway are relatively small. Brennan Street parking and servicing will need to be managed by landowner to ensure that emergency vehicle access is not hindered.

### *Cycle storage*

A number of cycle stores are proposed, and the mix of type and inclusive cycle stands is welcomed. I would request clarification that access to all stores (inc door, corridor and aisle widths as well as ceiling heights) are suitable to accommodate larger/adapted cycles. These will need to adhere to TfL's LCDS. There is a cycle channel proposed to the basement store, is this able to accommodate larger/adapted cycles? A pre-occupation condition outlining the detailed cycles stores for each use class and visitor cycle parking should be attached to any consented scheme. All cycle stores need to be retained and maintained for the lifetime of the development.

### *Car Parking*

All new and future occupiers should be made exempt from purchasing CPZ permits. This is to avoid additional stress on the LBTH CPZ network. I understand that there will be 2 additional

accessible parking spaces located on Wood Wharf. These will need to be retained and maintained for the life of the development and will need to be allocated to blue badge holders only. Dimensions will need to meet minimum standards of 6m x 2.4 (is parallel parking without any obstruction on the footway) and 6m x 3.6m (if perpendicular parking).

### *Summary*

T&H has no objection to the proposal but requests a condition for detailed cycle parking is attached to any consented scheme.

### **LBTH Waste**

As part of our review, we aim to ensure that all necessary information is provided to effectively manage waste across all land uses within the site. This also allows for a clearer understanding of the development's impact and ensures compliance with required standards.

The key aspects of the proposed waste strategy have been clarified as outlined below:

- **Segregation of Waste:** The segregation between PBSA and commercial waste complies with the SPD guidelines, which is positive.
- **Access:** The waste collection strategy has been developed in line with the surrounding Wood Wharf Masterplan, utilizing the loading bay area via two lorry lifts on the southern side of Brannan Street. This allows servicing vehicles to enter and exit SA2 in forward gear, which is preferable as it avoids the need for a 26-tonne waste vehicle to reverse.
- **Student Access to Bin Stores:** This is within the required guidance and deemed acceptable.
- **Waste Storage Capacity:** The proposed waste strategy for the development has been primarily modelled on the waste arrangement for the consented 30 Marsh Wall scheme. This strategy, haven been agreed upon with LBTH Waste Officers during pre-application discussions and subsequent correspondence, provides little room for adjustments or redesign of the servicing and waste collection arrangement.

The waste storage has been planned on twice a weekly collection arrangement coupled with in-bin compaction for both refuse and recyclable materials. We currently accept compacted general waste with a ratio not exceeding 2:1. However, I should mention that we haven't agreed to accept compacted recyclable waste, particularly the cardboard element, due to the risk of regular hang-ups during disposal. If alternative solutions are proposed to resolve this issue, we would be open to consider.

- **Commercial Waste:** Each individual retail unit is provided with dedicated storage bins/bags to store waste for up to two days, which will ensure effective waste management. As these units will have private waste arrangements, the frequency of collections can be adjusted to accommodate their needs.
- **Bulky Waste Collection:** The proposed bulky waste storage and collection arrangements are acceptable.

Apart from the in-bin compaction of recyclable waste, I am happy for the proposal to be progressed.

## **6. RELEVANT PLANNING POLICIES AND DOCUMENTS**

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

6.2 In this case the Development Plan comprises:

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

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

*Growth (spatial strategy, healthy development)*

- London Plan policies: SD1, SD10, GG5
- Local Plan policies: S.SG1, S.H1, D.SG3

*Land Use (social infrastructure, student, employment, retail)*

- London Plan policies: GG2, SD4, SD5, SD6, SD7, SD8, SD9, S1, H1, H15, E11, E9, D3
- Local Plan policies: S.TC1, D.TC2, D.TC5, D.H6, S.H1, S.EMP1

*Housing (affordable housing, housing mix, housing quality, student housing, amenity)*

- London Plan policies: SD1, GG2, GG4, H1, H4, H5, H15
- Local Plan policies: S.H1, D.H2, D.H6

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

- London Plan policies: D1, D2, D3, D4, D5, D8, D9, D11, D12, HC1, HC2, HC3, HC4, SI16
- Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, S.DH5, D.DH6, D.DH7

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

- London Plan policies: D3, D8, D9, D13, D14, SI17
- Local Plan policies: D.SG4, D.DH8, D.ES9

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

- London Plan policies: T1, T2, T4, T5, T6, T6.1, T7, SI15
- Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4

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

- London Plan policies: GG6, G1, G4, G5, G6, G7, SI1, SI2, S13, S14, SI5, SI6, SI7, SI8, SI12, SI13, SI16, SI17, D11, D12, D13
- Local Plan policies: S.SG2, S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.ES10, S.OWS1, D.OWS3, D.OWS4, S.MW1, D.MW3

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

*National*

- National Planning Policy Framework (2023)
- National Planning Practice Guidance (as updated)
- National Design Guide (2021)
- National Model Design Code

*GLA*

- Air Quality Positive LPG (2023)
- Air Quality Neutral LPG (2023)
- Characterisation and Growth Strategy LPG (2023)



- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Urban Greening Factor LPG (2023)
- Circular Economy Statements LPG (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- Whole Life Carbon LPG (2022)
- Be Seen Energy Monitoring LPG (2021)
- Public London Charter LPG (2021)
- Affordable Housing and Viability SPG (2017)
- Housing SPG (2016)
- Social Infrastructure SPG (2015)
- Accessible London: Achieving an Inclusive Environment SPG (2014)
- The Control of Dust Emissions during Construction and Demolition SPG (2014)
- All London Green Grid SPG (2012)
- Planning for Equality and Diversity in London SPG (2007)
- Accessible London SPG

#### *LBTH*

- LBTH Planning Obligations SPD (2021)
- LBTH High Density Living SPD (December 2020)
- LBTH Refuse, Recycling & Waste (July 2021)
- LBTH Community Infrastructure Levy (CIL) Charging Schedule (2020)

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

- Purpose Built Student Accommodation LPG
- Development Viability LPG
- Digital Connectivity Infrastructure LPG
- Fire Safety LPG

6.6 The following additional documentation/regulations have been considered as part of this report.

- 3rd edition of the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight': a good practice guide' (2022).
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

## **7. PLANNING ASSESSMENT**

7.1 The key issues raised by the proposed development are:

- i. Land Use
- ii. Housing
- iii. Design
- iv. Heritage
- v. Neighbour Amenity
- vi. Transport
- vii. Health and socio-economic impacts
- viii. Environment
- ix. Infrastructure
- x. Equalities and Human Rights

#### *Environmental Impact Assessment*

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 Building Design Partnership.

- 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 Screening Opinion (PA/22/00276) on 9 March 2022 which was then confirmed by the Secretary of State on 4 May 2022. The submitted Environmental Statement (ES) accords with this Opinion and assesses the environmental impacts of the development under the following topics:
- Air Quality
  - Climate Change and Greenhouse Gas Emissions
  - Built Heritage
  - Daylight, Sunlight, Overshadowing and Solar Glare
  - Noise and Vibration
  - Socioeconomics
  - Townscape and Visual Impact
  - Wind Microclimate
- 7.5 The ES has been reviewed in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations).
- 7.6 The application has been supported by an ES (February 2024) an amended Non-Technical Summary (NTS) (September 2024), an ES Interim Review Report Response (21 August 2024), a Further Review Report Response Schedule (27 September 2024) and a Further Review Report 02 Response (21 October 2024).
- 7.7 Subsequent ES submissions were considered to be 'further information' under Regulation 25 and was processed as required under the EIA Regulations.
- 7.8 The Council's Appointed EIA Consultants independently examined the ES, to prepare an Interim Review Report (IRR) and to confirm whether the ES satisfies the Regulations. This is supported by reviews by the authority's internal environmental specialists. The IRR dated 18 July 2024 identified clarifications and potential 'further information' required under Regulation 25.
- 7.9 In response to the IRR, the applicant submitted the ES Interim Review Report Response dated 21 August 2024. The Council's Appointed EIA Consultants issued a Final Review Report (FRR) 001 dated 05 September 2024 that took account of the applicant's responses. Further clarifications and information required under potential Regulation 25 were requested and were provided by the applicant in an amended Non-Technical Summary and the Further Report Response Schedule dated 27 September 2024.
- 7.10 The Council's appointed EIA Consultants then issued the additional Final Review Report 02 dated 10 October 2024 which raised one additional further query which was subsequently addressed by the applicant on 21 October 2024 via the Further Review Report 02 Response.
- 7.11 The Council's EIA Officer and the Councils 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.

- 7.12 The 'environmental information' has been examined by the Council and has been taken into consideration by officers to reach a reasoned conclusion of the significant effects of the Proposed Development, which forms the basis of the assessment presented in this report.
- 7.13 Mitigation / monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations. The environmental information comprises the ES, including any further / other information, any representations made by consultation bodies and by any other person about the environmental effects of the Proposed Development.

## **Land Use**

### Current approved land use of the site and provision of standard C3 housing

#### *The context of the Wood Wharf Masterplan as approved/constructed*

- 7.14 The consideration of the proposed land use needs to be made in the context of the wider Wood Wharf Masterplan. The current approved use of Plot F1, the development plot on which the proposed building would be constructed, is for standard residential accommodation in use class C3, including the possibility of providing some affordable housing in line with adopted parameter plans and the s106 agreement for that development. The maximum height of any building to be built on this plot could be up to +190m AOD, which is the third tallest approved building on the Masterplan.
- 7.15 The approved development specification of the Wood Wharf Masterplan is highly flexible in the amount of floorspace of each approved use that could be provided across the entire Masterplan site. In respect of C3 housing, the Masterplan requires the delivery of a minimum of 1,700 homes and a maximum of 3,610 homes. The indicative scheme submitted with the original application for the outline permission anticipated 3,104 homes to be delivered. The purpose of that indicative scheme was to demonstrate one way in which the Masterplan could be delivered and so does not carry any weight in the current decision making process but is useful in demonstrating the overall level of housing that would have been delivered if the scheme were to have been approved in detail at that point in time.
- 7.16 There is only one other currently undeveloped development plot which is currently approved to provide C3 housing within the Masterplan area, which is Plot F3, a small plot in the northeastern corner of the Masterplan which is approved for a maximum height of +26m AOD. This plot currently accommodates residential buildings known as Lovegrove Walk.
- 7.17 Of the C3 housing to be delivered under the Masterplan, 25% by habitable room is required to be delivered as affordable housing in line with the approved outline permission and agreed s.106 agreement. Of that 25%, 80% is required to be delivered as affordable rented housing with 20% to be delivered as intermediate affordable housing, again calculated by habitable room.



**Figure 7: Image of Wood Wharf construction progress looking southwest from Plot B3. Most of the buildings shown in this image provide standard C3 residential accommodation.**

- 7.18 To date 3,334 homes have received detailed approval through reserved matters permissions, all of which have either been fully built out or are currently under construction. 2,721 of those homes (75% by habitable room) are market sale homes and 613 (25% by habitable room) have been provided as affordable housing, of which 176 (21% by habitable room) are intermediate homes and 437 (79% by habitable room) are affordable rented homes. This means that a maximum of 276 additional homes could be built under the outline permission currently approved.
- 7.19 As can be seen in figure 8 below, the vast majority of units that have been approved via reserved matters approvals are in line with the required unit and tenure mixes as set out in the development specification of the Masterplan. There are however some discrepancies between the “delivered” mix of affordable rented accommodation and that which was approved at outline stage, which will need to be addressed and reconciled within the remaining residential plots, i.e. just Plot F3. Additionally, it should be noted that the current adopted local plan would actually require 25% 1 bed homes and 30% 2 bed homes which aligns much more closely with the currently delivered mix. There is also currently an over-delivery of family-sized homes as compared to both the approved mix and current local plan policies which addresses local needs.
- 7.20 Due to the number of homes which are likely to be feasibly deliverable on Plot F3, it is most likely that these homes will be delivered as 1 bed affordable homes in order to assist with meeting the unit size and tenure mix requirements of the Wood Wharf Masterplan. However, this is a hypothetical assumption given no detailed design for a scheme on that plot has been prepared and the applicant is under no obligation to provide any more C3 housing at all if it wishes not to, given any discrepancy between the approved unit size and tenure mix can also be addressed by other means.

Tenure	Size	Required No. Homes (%)		Approved No. Homes (Units)	Approved No. Homes (%)	
Market	Studio	5-20%		544	20%	
	1 bed	20-40%		1,087	39.9%	
	2 bed	20-40%		936	34.4%	
	3+ bed	5-20%		154	5.6%	
	Sub-Total			2,721	100%	
Intermediate	Studio	10% Max	45-55%	14	8%	53.4%
	1 bed	N/A		80	45.5%	
	2 bed	35-45%		73	41.5%	
	3+ bed	5-10%		9	5.1%	
	Sub-total			176	100%	
Affordable/Social Rent	1 bed	30%		102	22.2%	
	2 bed	25%		132	30.3%	
	3 bed	30%		135	31.9%	
	4+ bed	15%		68	15.6%	
	Sub-total			437	100%	

**Figure 8: Unit and tenure mix approved to date**

*Policy Context*

- 7.21 Both the NPPF and the London Plan contain policies which generally seek and encourage the maximisation of delivery of all types of housing through optimising appropriate sites, particularly sites allocated for housing.
- 7.22 Local Plan Policy S.H1 (Meeting Housing Needs) requires the delivery of at least 58,965 new homes across the borough between 2016 and 2031. The Wood Wharf Masterplan clearly has and will continue to contribute towards this target.
- 7.23 That policy, however, also states that achieving this target will be achieved through “ensuring development does not undermine the supply of self-contained housing – in particular family homes” and “resisting development which would result in a net loss of residential floorspace or family units”.
- 7.24 Paragraph 9.15 of the supporting text to that policy details what is meant by “undermining the supply of self-contained housing”:

*“Development for non-self-contained units will not be supported where it utilises land identified for self-contained housing through a current planning permission, or through the borough’s development plan. It is recognised that other policies in this plan identify suitable locations for other land uses. Developments of other land uses, where supported by policy and/or site allocations, are not considered to undermine the supply of self-contained units. Family housing requires particular protection, due to high levels of identified need.”*

- 7.25 Therefore, if PBSA were to be supported by Development Plan Policies or the Wood Wharf Site Allocation, it would not be considered to undermine the supply of self-contained housing.
- 7.26 Local Plan Policy D.H6 (Student Housing) requires development proposing purpose-built student accommodation, such as the proposed scheme, to amongst other things “not compromise the supply of self-contained homes”. Paragraph 9.63 of the supporting text then goes on to state that:

*“Proposals involving the development of student housing must demonstrate that it will not involve the net loss of existing self-contained homes and/or will not involve land identified for self-contained housing through a current planning permission or through a site allocation set out in the borough’s development plan.”*

#### *Assessment*

- 7.27 In undertaking the assessment of the current scheme, officers have therefore been mindful of the requirements of the above mentioned Local Plan Policies to not undermine or compromise the delivery of standard self-contained C3 residential homes. The use of the terms “undermine” and “compromise” are relatively vague and open to interpretation. Colleagues in Planning Policy were consulted on the application and stated that the policies could be interpreted in a number of ways however the supporting text is relatively clear in what is intended by these terms (i.e. approval of a different use, not supported by policy, on a site allocated for housing either through an extant planning permission or through a site allocation/the development plan.)
- 7.28 Whilst the site does benefit from an extant consent to provide C3 housing, the current delivery of housing under the Wood Wharf Masterplan outline consent has achieved nearly double the minimum number of homes that needed to be delivered in order for the applicant to comply with their obligations under that permission leaving only 276 out of 3,610 (c7.6%) possible approved Class C3 homes undelivered. The delivered homes have also been, or can continue to be, delivered in line with obligations as to unit size and tenure mixes. The applicant has therefore essentially fully complied with the outline permission in terms of the delivery of housing on the site and that the extant permission therefore no longer requires the delivery of any further housing.
- 7.29 The overall Wood Wharf Masterplan is not reliant on Plot F1 to meet the obligations of the development specification, and the applicant has more than met its obligations in terms of the delivery of the number of C3 homes on the Masterplan. The applicant could theoretically leave the plot completely undeveloped until the period for the approval of reserved matters for development plots under the outline consent expires in a little over 5 years’ time, at which point the site would no longer benefit from an extant consent for C3 housing and no action could be taken against the applicant. The applicant could not therefore, at this point, be required under the above policies to bring the plot forward for development providing C3 housing.
- 7.30 Additionally, there is no minimum requirement for the number of homes to be provided within the Wood Wharf Site Allocation within the Local Plan, only a requirement to maximise the delivery of family homes. It should be noted that the percentage of family homes required to be provided within the Masterplan is currently being exceeded by the applicant, particularly in the affordable rented tenure.
- 7.31 The Site Allocation simply states that the Wood Wharf Masterplan should provide “Housing” and “Employment: comprehensive mixed use development within the preferred office location (secondary) to provide town centre uses including small-to-medium enterprises and large floorplate offices”. The argument is that, in the absence of a statement in the Site Allocation, or elsewhere within the Local Plan, the term “housing” should be interpreted to include all types of housing as set out in both the NPPF and the London and Local Plans, and should not be limited to only C3 Housing, rendering the provision of Purpose Built Student Accommodation in line with the Site Allocation.

- 7.32 The only reference to a particular type of housing within the Site Allocation is that it should “maximise the creation of family homes”. As already discussed above, the applicant is currently overdelivering on the provision of family homes as against the approved mix and so is arguably already complying with this obligation as well as being under no obligation under that outline consent to provide further C3 housing within the wider scheme.



**Figure 9: View of construction progress on Wood Wharf, looking east from Plot B3. Plot F2 can be seen under construction to deliver Affordable Rented accommodation. The tower in the centre of the building provides Intermediate affordable accommodation.**

- 7.33 Colleagues in Planning Policy have stated that this is not the intention of the policy but that it could indeed be interpreted in that manner. In particular, where C3 Housing is mentioned elsewhere in the plan it is explicitly stated as such or as “self-contained housing”. Officers are also mindful that the Site Allocation should also be read in conjunction with the rest of the Local Plan as a whole and so any deviation from the Site Allocation which is in accordance with all other policies could be considered acceptable on balance.
- 7.34 It should also be noted that the evidence base for the adopted Local Plan includes references to the delivery of approximately 3,300 homes on the Wood Wharf site within the Five-Year Housing Land Supply and Housing Trajectory Statement (2018) (evidence base reference SED27). This was included in that document as a result of the approved Affordable Housing Delivery Strategy which was submitted to the Authority and approved under reference PA/15/01072 and in line with Condition 27 of the decision notice for the Outline Permission and the s.106 agreement relating to the Outline Permission.
- 7.35 Finally, the supporting text to London Plan Policy H1 at paragraph 4.1.9 states that “non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home”. On this basis, the proposed student accommodation would in fact count as 364 homes towards the Borough’s Housing targets, 88 more homes than could be built under the current outline permission if the site were to come forward for detailed consent for C3 Housing.

7.36 In summary, Officers are satisfied that the applicant has already delivered the level of housing which it is required to do under the Masterplan, far exceeding the minimum number of homes required to be provided. They are also able to satisfy all other obligations as to unit size and tenure mix including the provision of affordable housing. The LPA therefore cannot require that further housing be built on the site if the applicant decides not to continue to deliver housing. The Site Allocation does not specify the type of housing which is required to be provided and so a different type of housing could feasibly be deemed to comply with the requirements of the site allocation, particularly given the level of delivery already being provided on the site against both the outline consent requirements and the evidence base in support of the adoption of the Local Plan and other documentation previously approved and accepted by the Local Planning Authority. Coupled with the significant quantum of housing of housing already delivered on the Masterplan site, it would be difficult to argue that the proposal to provide student accommodation, which is itself considered a form of housing under adopted national, regional and local policies, would either undermine or compromise the supply of self-contained housing.

#### Introduction of Purpose Built Student Accommodation

- 7.37 The principle of providing purpose-built student accommodation in this location is supported by planning policy. At a national level NPPF highlights the importance of boosting the housing supply, with paragraphs 60 and 63 setting out the importance of providing for specific housing groups, such as students.
- 7.38 London Plan Policy H15 states that strategic and local requirements for student housing which meet a demonstrable need are to be addressed by working closely with stakeholders in higher and further education in well-connected locations, particularly as part of mixed-use regeneration and redevelopment schemes, promoting mixed and inclusive communities.
- 7.39 The London Plan acknowledges the significant demand for student accommodation, (paragraph 4.15.2) with a potential requirement for some 3500 places annually over the plan period. It goes on to recognise that the provision of student accommodation may reduce pressure on other elements of the housing stock currently occupied by students in the private rented sector. It also states that there is no specific borough-level targets for student accommodation as the location of this need will vary over the Plan period as higher education providers' estate and expansion plans develop and the availability of appropriate sites as well as changes in Government policy occur.
- 7.40 The supporting text to that policy also makes it clear that where a PBSA development meets all the requirements of Part A of the Policy, boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing.
- 7.41 London Plan Policy SD6 also sets out that Town Centres have a particular suitability to accommodate a diverse range of housing which should be considered and encouraged including, amongst others, student accommodation.
- 7.42 Local Plan Policy H1 (Meeting housing needs) requires development to contribute towards the creation of mixed and balanced communities that respond to local and strategic need through and that housing which seeks to meet the needs of specific communities including students will be supported. Policy D.H6 then sets out the requirements for purpose built student accommodation, namely that it should be directed to locations which are within close proximity of the borough's higher education institutions or in highly accessible locations and must:
- a) Not compromise the supply of land for self-contained homes;
  - b) Have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;
  - c) Respect existing residential amenity, and
  - d) Provide 5% of student rooms which are wheelchair accessible, including access to a wheelchair accessible shower room for independent use.



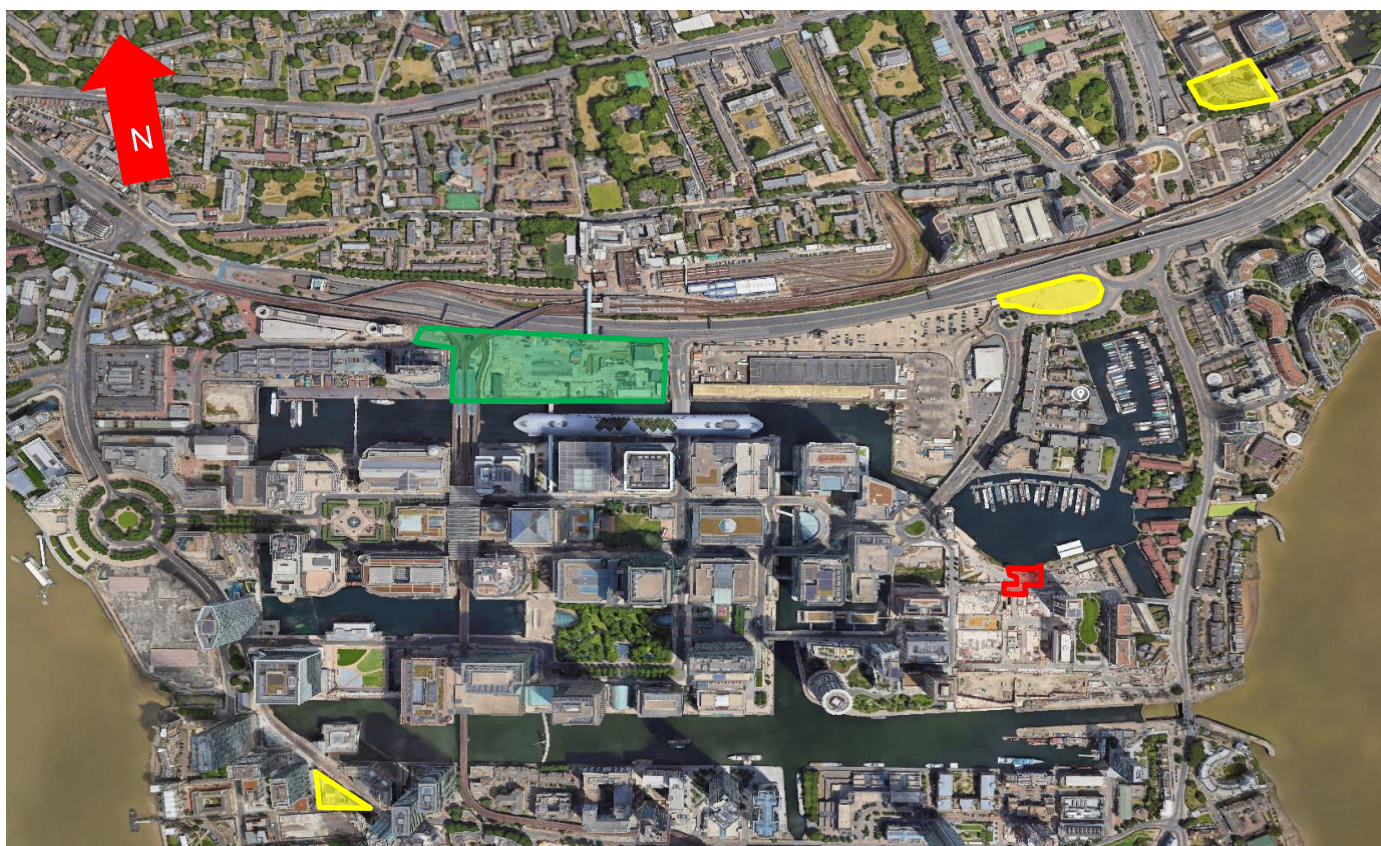
- 7.43 This policy recognises the positive impacts that student housing brings to the local economy, local communities and to the Borough's higher education industry. Parts (a) and (b) of the above will be discussed in this section of the report whereas parts (c) and (d) will be discussed in the sections of this report dealing with amenity impacts and the quality of the proposed accommodation respectively.



**Figure 10: Image of the site in its current state from Brannan Street.**

- 7.44 The GLA in their Stage 1 Report support the principle of the student use stating that it will meet an identified strategic need and contribute towards the housing targets for the Isle of Dogs Opportunity Area (a specific capacity of 29,000 homes across the plan period) and for Tower Hamlets as a whole.
- 7.45 The Wood Wharf development was intended to create a new and evolving neighbourhood which would support and link into the wider Canary Wharf Estate, providing a mix of uses that were not present or necessarily appropriate within the estate itself but could function in synergy with the wider estate. Given the significant levels of standard C3 residential and office development in both Wood Wharf and the wider Canary Wharf estate, the development would further diversify the range of uses, including introducing an element of affordable student accommodation to the area meeting the needs of students who are perhaps not able to access other student accommodation. As such, the development would significantly contribute to the creation and enhancement of a mixed and inclusive neighbourhood, a key focus of the original Wood Wharf Masterplan and the Local Plan.
- 7.46 A PBSA Demand Study & Market Analysis prepared by Knight Frank has been submitted with the application to detail the overall supply and demand across the area. This study provides insight into the shortfall of student accommodation units within London and the projected demand for such units, including a rising number of students within the Borough. The study takes account of three relatively recently approved schemes within Tower Hamlets which all seek to provide student accommodation. These are:

- a) the 2 Trafalgar Way scheme (ref: PA/20/01402), which will provide 1,672 student beds alongside other uses. This scheme is currently under construction and is situated approximately 400m to the north of the application site;
- b) the 30 Marsh Wall scheme (ref: PA/20/02588), which will provide 1,069 student beds. This scheme is in the process of discharging pre-commencement conditions in order to commence construction and is approximately 900m to the west of the application site on the other side of the Canary Wharf Estate; and
- c) the North Quay scheme (ref: PA/20/01421), which obtained outline planning permission for a number of different uses across a maximum of 355,000sqm of floorspace, including an option of up to 100,000sqm of student accommodation (which would equate to approximately 2,912 student rooms dependent on room sizes and types). This scheme is within the same ultimate ownership as the current application and is located approximately 500m to the northwest of the site and forms the northern edge of the wider Canary Wharf estate.



**Figure 11: Satellite imagery showing site in red, North Quay in green and, from top to bottom, Mulberry Place, 2 Trafalgar Way and 30 Marsh Wall in yellow.**

- 7.47 Even with the 3 identified schemes being considered the study outlines that there is currently a supply/demand imbalance for student units within London and within Tower Hamlets, where the number of students needing a bed space is between approximately 3.7 to 4.6 students per currently available bed space. There is therefore clearly an identified need for student accommodation both within the borough and wider London.
- 7.48 Officers note that the Student Demand Study fails to take account of the 716 student rooms which have been approved at Mulberry Place under planning reference PA/21/021825 which were granted permission after appeal on 26 January 2023. However, the number of student rooms which could be delivered as part of that scheme are not considered to significantly alter the findings of the Study given the significant increasing demand for PBSA room identified in the study, noting that the Study concludes that there is a deficit of 4,980 rooms without taking account of that scheme's contribution to the supply (a deficit of 4,264 rooms would remain).
- 7.49 It is worth noting that the applicant has submitted a concurrent application to amend the development specification of the North Quay scheme via s.96 of the Town and Country

Planning Act 1997 as amended (ref: PA/24/00977) which would reduce the overall maximum permitted floorspace for student housing in the vicinity of the site and within the same ultimate control of the applicant by the same amount of floorspace as would be provided under the current proposals before the Committee (i.e. 32,791sqm).

- 7.50 The resultant loss of floorspace approved for student accommodation on that site would then also slightly increase the likelihood of an increased number of standard C3 residential homes on that site. However, given the high level of flexibility embedded in the development specification for that scheme requiring between 0 and 100,000sqm of residential floorspace, it would also increase the likelihood of other approved uses being developed and still does not guarantee that any standard C3 residential floorspace will be delivered under that scheme. Officers would therefore recommend that only limited weight be applied to this in the consideration of the current scheme.
- 7.51 However, what that amendment would do is guarantee that there would be no net-increase in student accommodation that could be built within the Borough above what has already been granted consent, effectively transferring the consented floorspace from one application site to the present site, both of which are within the same ultimate ownership/control. The granting of both that amendment and the current application would ensure that some form of accommodation addressing the borough's housing targets would be delivered on the application site, whilst also ensuring that there is not an over-concentration of student floorspace within the Borough noting the high number of spaces already being delivered in Marsh Wall, Trafalgar Way and could possibly be delivered on North Quay as well as other sites within the Borough.
- 7.52 That application is currently being considered for determination via delegated authority in line with the Council's adopted scheme of delegation, however the acceptability of that application is dependent on the acceptability of the present application given the relatively significant levels of floorspace involved and the contribution that makes to the borough's housing supply as well as Local Plan Policy requiring the protection of approved PBSA floorspace. The determination of that application is therefore awaiting the determination of this application. Should members be minded to accept Officers' recommendation to grant permission for the current proposals, then that non-material amendment application would be granted at the same time as, or immediately prior to, any resultant permission of the present application to ensure that the resultant impacts on delivery of student accommodation floorspace are secured appropriately.
- 7.53 In terms of part A of policy D.H6, the proposal must ensure that the provision of student units would not compromise the supply of self-contained homes. Importantly, paragraph 9.63 Policy D.H6 identifies that proposals for student housing must demonstrate that there would not be a resultant net loss of self-contained housing identified through a site allocation within the Local Plan. In this regard, and as discussed earlier in this report, the site is located within the Wood Wharf Site Allocation which contains the following use requirements: Housing and Employment. The Site Allocation does not explicitly reference the proposed student accommodation use; however, it also does not explicitly exclude it either. Student accommodation is also considered under the adopted development plan to be a form of housing meeting an identified need. The full reasons why officers have concluded that there is no resultant loss of self-contained housing is set out earlier in this report.
- 7.54 The application proposes to provide 912 PBSA rooms on the subject site, the rooms would be provided within a single building, 320 of which would be provided as affordable rooms in line with the London plan definitions. This represents 35.1% by habitable room and 35.7% by floorspace which is fully compliant with London Plan policies. Using the 2.5:1 ratio specified within the London Plan, the proposed 912 student accommodation units equates to 364 residential units. This figure would therefore make a significant contribution to the Borough's housing targets. The provision of the PBSA rooms therefore provides a significant public benefit to the Borough as well as wider London. That contribution is also a greater contribution towards housing targets than could be provided under the extant permission
- 7.55 The Local Plan sets out that student accommodation must be built in highly accessible locations or proximate to the Borough's higher education institutions. The site itself has

average public transport accessibility with a PTAL rating of 3, however just 50m to the west that rises to a rating of 5. Once the Wood Wharf Masterplan is complete and all access roads are operational, that PTAL rating is likely to increase. Within Canary Wharf there are very strong public transport links with DLR, Elizabeth Line and London Underground services within walking distance of the site.

- 7.56 In terms of proximity to higher education institutions, the planning statement outlines a number of institutions within a variety of distances to the application site including from the University College London (“UCL”) Business School which is based within One Canada Square under 800m to the west of the site and currently looking to expand via a planning application (reference PA/24/01241) to take up a further two floors within the building. Additionally, Ravensbourne University London campus is less than 1.5km away and Queen Mary University, University of Greenwich, Trinity Laban Conservatoire of Music and Drama and Goldsmiths College are all within approximately 3km of the site. The application therefore meets these policy tests appropriately.
- 7.57 It is worth noting that UCL’s proposed expansion within Canary Wharf indicates that there is a growing population of students and education spaces within the vicinity of the proposal site. This is only likely to increase with the imminent growth of the Life Sciences cluster within North Quay.
- 7.58 Part B of the above-mentioned policy advises that an undertaking must be in place to provide housing for students at one or more specific education institutions. This is also mirrored in policy H15 of the London Plan which sets out the need for the majority of bedrooms to be secured through a nomination agreement. The application is submitted with a letter from UCL, the institution present within the Canary Wharf Estate, which states that they support the application to provide student housing and are willing to explore a nomination agreement in due course. It is of note that UCL are also seeking to expand their current presence within Canary Wharf which would indicate that there is opportunity to provide further direct synergy between the proposed development and the wider estate. The entry into a nomination agreement would also be secured via an obligation in a s.106 agreement.
- 7.59 Part C of policy D.H6 seeks to ensure the amenity of surrounding uses and the overall living standards of the existing environment do not become unreasonably impacted. This includes noise disturbance issues, loss of access to shops and services for local residents. Mitigation measures and management conditions should be incorporated within schemes.
- 7.60 In terms of respecting existing residential amenity, there is unlikely to be an overconcentration of student housing as there is no other purpose-built student housing in the immediate vicinity. The applicant has also provided a student management plan setting out the principles by which the block will be managed, which has been prepared by a large student accommodation management company which manages over 34 student buildings across the UK and Europe. Whilst the ultimate management company cannot be secured, officers are satisfied that the principles of the plan are acceptable and would be carried through to the final management plan. The management plan has been carefully considered by the council and has been deemed sufficient with the final management plan being secured by planning condition
- 7.61 This management plan should help to reduce noise disturbance to surrounding residents and other potential anti-social behavioural concerns, albeit no objections have been received on these grounds as part of the consultation process. The proposed development will therefore respect existing residential amenity and have sufficient security.
- 7.62 With regards to part D of policy D.H6, the development provides a minimum of 5% wheelchair accessible units. The GLA issued a Practice Note in November 2022 relating to Student Accommodation and the impact of Buildings Regulations Approved Document M. There are no specific requirements set out in adopted London Plan Policies as to the specific quantum of accessible student bedrooms. In that note it is clarified that irrespective of the policy wording, 15% of rooms should be provided as accessible rooms. It should be noted that the Practice Note is not adopted policy and refers to London Plan Policy E10 which relates to Visitor Accommodation. That policy refers to providing a number of accessible rooms in line with the requirements of Hotel Accommodation under British Standard BS8300-2:2018. That

same British Standard also includes specific requirements that are applicable to student accommodation.

- 7.63 The applicant is proposing to provide 5% of the rooms as accessible from the point of occupation and an additional 5% will be provided to be adapted for persons with ambulant mobility impairments. One room would be adaptable to include a hoist system and a further 5% accessible room provision could be provided as accessible should the need arise.
- 7.64 Officers note that this is not in line with the Practice Note and the GLA comment to provide 15% accessible rooms “up front”, however the proposal is largely in line with the British Standard requirements for Student Accommodation and securing the full requested 15% provision on an as required basis is considered to be an acceptable approach given the requirement in the adopted Local Plan Policy D.H6 only requires a maximum of 5% accessible rooms and the general compliance with the British Standard adopted by the London Plan but as it relates to Student Accommodation. This arrangement will be secured via a planning obligation.

#### *Proposed retail space*

- 7.65 A small café/retail space is proposed at ground floor of the site measuring 156sqm. This will be located on the northern side of the building facing onto the Blackwall Basin. The proposed café will provide activation of the ground floor on this side of the building and is supported, in line with Local Plan Policies relating to retail and other town centre uses within the Canary Wharf Metropolitan Centre and will contribute to the activation of the wider Wood Wharf estate.



**Figure 12: Image of retail space facing onto the Boardwalk along the Blackwall Basin.**

#### *Conclusions on Land Use*

- 7.66 It has been clearly demonstrated that the proposal to introduce student housing on the site is acceptable in line with Local and London Plan Policies relating to the location and requirements of student housing on the site itself. However, the site is located within a site allocation intended to provide housing and employment floorspaces. The interpretation of what is meant by “housing” in site allocation terms is not clear however the introduction of PBSA, which is a recognised form of housing within the Development Plan would contribute to meeting the borough’s housing targets which also meets an identified need.
- 7.67 The extant consent has already significantly overdelivered on the minimum number of homes that were required to be built within the approved development specification. The proposed introduction of PBSA on the site furthers the intention of the Wood Wharf Development in introducing a new mixed-use and diverse neighbourhood to the wider Canary Wharf Estate and would serve existing nearby educational establishments. The proposed delivery of PBSA on the site would therefore optimise the use of the site in line with relevant policies, providing an acceptable use and ensuring that the site does not remain an undeveloped part of the

Masterplan. Finally, subject to the approval of the amendment to the North Quay development, there would be no net-increase in student floorspace already approved and with the potential to be constructed. Officers are therefore satisfied that the proposals are acceptable in land use terms.

## **Student Housing and Quality**

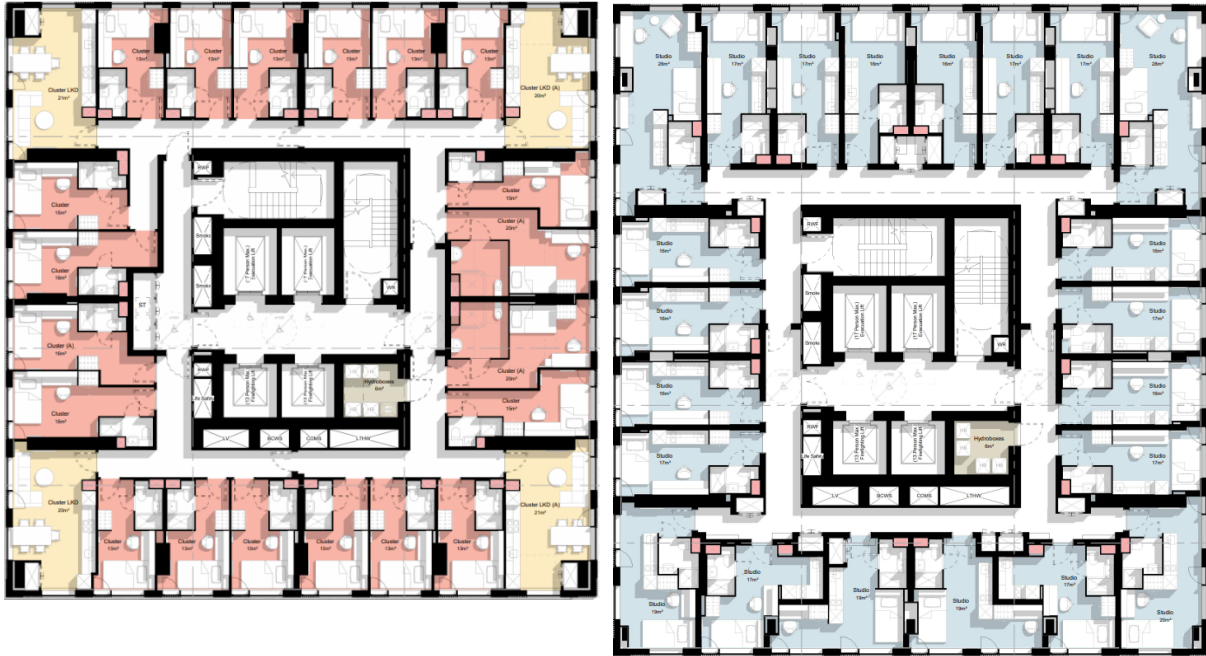
### Affordable Student Housing

- 7.68 London Plan Policy H15 requires the majority of the student bedrooms, including all affordable, to be secured through a nominations agreement with one or more Higher Education Providers (HEP). At least 35% of the accommodation must be secured as affordable student accommodation to follow the “Fast Track Route.” Local Plan Policy D.H6 supports this approach and as stated above, the applicant has committed to entering into a nominations agreement via a s106 obligation with one or more HEP.
- 7.69 The proposed development would provide 35% equating to 320 bedrooms of the student accommodation as affordable, to be secured at rents equal to or below 55% of the maximum Government maintenance loan for living costs in accordance with the London Plan Annual Monitoring Report (AMR). The proposed offer is policy compliant and is therefore eligible for the Fast-Track Route, with the affordable units being secured at the levels set out in the AMR in the S106 agreement, inclusive of all services and utilities as offered to a market rented unit.
- 7.70 Information has been submitted stating that the affordable student accommodation would also have no discernible differences in quality compared to the private accommodation, with all rooms being finished to the same standard. The affordable and wheelchair accessible element shall be secured via a S106 obligation and condition.
- 7.71 As per London Plan Policy, the development would be subject to an early-stage viability review in order to ensure the maximum amount of affordable accommodation is being delivered on site.

### Quality of Accommodation

- 7.72 London Plan policy H15 also requires purpose-built student accommodation to provide adequate functional living space for students in terms of the design and layout of bedrooms. Supporting paragraph 4.15.6 of the London Plan states that student accommodation should achieve a high residential quality in line with Policy D3, which requires, among other things, a safe, secure and inclusive environment, appropriate outlook, privacy and amenity, conveniently located open spaces, and comfortable and inviting indoor and outdoor environments.
- 7.73 While there are no defined space standards (including amenity space) for student accommodation, it is the view of officers that the principles of good residential design should be applied to a proposal for student housing given that student accommodation is a primary place of residence. It is critical that design of purpose-built accommodation is of a high quality with adequate amenity to contribute to healthy and sustainable lifestyles.
- 7.74 The PBSA rooms are intended for single use only, with no provision for larger units to support families.
- 7.75 The submitted accommodation schedule sets out the range of cluster and studio rooms proposed which would range from 13sqm to 26sqm, providing relatively generous private space for future residents. Officers note that the LPA’s design officer has raised concerns about the proposed student rooms on the basis of the limited size of the proposed rooms, however the size of these units is commensurate with other student schemes recently approved by the LPA and in the absence of any specific adopted space standards relating to student accommodation officers are satisfied that the rooms are appropriately sized.

7.76 The majority of the proposed rooms will be single aspect, save for larger studio rooms located on the corners of the building which will be dual aspect, together with the cluster living/kitchen/diners (LKDs). Even so, the proposed student accommodation will be well lit and ventilated with all habitable rooms having acceptable levels of outlook and privacy. The bedrooms have been designed with an efficient layout to provide sufficient space for a bed, desk and chair, and storage space for future occupants, as well as en-suite shower rooms. There will be a roughly 50:50 split between studio rooms and cluster rooms providing a good variety of room choices.



**Figure 13: Layout of floors 01-08 on the left including exclusively Cluster Rooms, and levels 40-43 including exclusively studio rooms.**

- 7.77 Levels 01-08 will exclusively be affordable cluster bedrooms with LKDs in each of the four corners of the building. There will be 1 cluster of rooms on level 09 with the rest of that level offering shared amenity spaces. Levels 10-39 will offer a combination of cluster and studio rooms with two sets of clusters on the southern side of the building and studios on the northern half, with large studios on the northern corners. Levels 40-43 will be exclusively studio rooms. Level 44 will then provide additional amenity space and an outdoor terrace.
- 7.78 Whilst the proportion of single aspect north facing units would not be acceptable within housing scheme, the arrangement proposed does not raise any particular planning concerns, given the short-term nature of student accommodation tenancies and the provision of communal amenity spaces with alternative aspects within the scheme.
- 7.79 The proposal includes 3,471sqm of dedicated shared amenity space across floors at ground, mezzanine level, level 9 and level 44 which equates to roughly 3.8sqm of amenity space per student. The amenity spaces include laundry, study space and gym/yoga studios and the Level 44 space will also include an external terrace. There is also 930sqm of proposed public realm surrounding the building including an area of boardwalk to the north of the building which ties in with a previously approved reserved matters approval for that space.

7.80 It should be noted that, applying the adopted 2.5:1 housing equivalency ratio in the London Plan, a reasonable calculation can be made as to what the required communal amenity space would be if the Local Plan targets as to standard C3 housing were to apply to PBSA. Based on the number of PBSA rooms being provided being the equivalent of 364 C3 homes, the requirement for that number of homes would be to provide 404sqm of communal amenity space. The proposed development will therefore provide more than adequate communal amenity space both internally and externally for students residing within the building.



**Figure 14: Images of Amenity Floor layouts at level 09 (left) and Level 44 (right).**

7.81 It is noted that the LPA's design officer has raised concerns about the proposal to only include shared amenity at three different locations throughout the building rather than providing spaces interspersed throughout the building. They have mentioned that the "mid-level" amenity is located too low in the building and will result in an inefficient layout in energy use terms and had therefore requested amenity spaces on each floor, particularly due to the size of the studio rooms and negating the need to travel up and down the building to access amenity space.

7.82 The pooling of amenity space approach was taken rather than providing dedicated amenity space at each floor to rationalise and optimise the floorplate of the building whilst delivering a high quality of accommodation for the students. Level 9 was chosen to provide the "mid-level" amenity because this is the point where the building steps out to provide a different floorplate and so the proposed use for amenity would provide a visual split in the façade at this level and a different type of activity. The high level amenity floor is at the top of the building to provide the best outlook and outdoor amenity space. Cluster bedrooms will also benefit from amenity space within LKDs located on each of the four corners of the building dedicate to a small number of students within the cluster. These are located to give dual aspect outlook.

7.83 Whilst the design officer's concerns are noted, the proposed amenity spaces are considered to be of exceptional quality and would provide exceptional outlook when compared to other similar schemes. The dispersal of amenity spaces throughout the building would likely result in lower quality spaces overall and potentially a lower level of usage in the operation of the scheme. In the absence of any adopted policy in relation to the provision of amenity spaces and the design/layout thereof, officers are satisfied that the proposed approach is appropriate and acceptable.

7.84 The maintenance and management of these spaces will be the responsibility of the developer. The remaining space at the top levels of the building is designated for plant and ancillary uses.



It is considered that the scheme provides an acceptable level of amenity space for the range of uses provided.

- 7.85 Noise and air quality will be appropriately controlled via planning condition and overheating will be mitigated by including openable windows to each student room except on the amenity floors where mechanical ventilation is required due to the fixed nature of the facades.

*Privacy & Outlook*

- 7.86 The majority of the student rooms will be single aspect. However, all of the LKDs, where students in cluster rooms would congregate and socialise, and a number of larger studios will benefit from dual aspect and therefore benefit from enhanced views and daylighting. The building will also be amongst the tallest within the Wood Wharf Masterplan and so will have excellent outlook for all rooms at higher levels and an acceptable outlook at lower levels. The rooms on the northern side of the building will have exceptional outlook across the Blackwall Basin. There are no issues as to privacy.

*Daylight, Sunlight & Overshadowing*

- 7.87 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. Guidance relating to daylight and sunlight is contained in the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight' (2022).

- 7.88 The applicant has provided an assessment of the internal levels of daylight and sunlight to be provided to the new homes as well as overshadowing of new amenity spaces, undertaken by GIA. This has been reviewed by an independent consultant, BRE on behalf of the Council. The assessment provides results for all of the proposed habitable rooms to be created within the proposed development.

- Methodology

- 7.89 Section 2.1 and Appendix C of the Building Research Establishment (BRE) guidance on Site Layout Planning For Daylight and Sunlight (2022) sets out two methods for assessing the daylighting conditions within new homes. These are Illuminance and Daylight Factor, which are taken from BS EN 17037.

- 7.90 Luminance is a measure of light falling on a surface, usually measured in lux. BS EN 17037 contains illuminance recommendations based around the illuminances that would be met or exceeded over half of the room, over half of daylight hours over the year. It involves using climatic data for the location of the site (via the use of an appropriate, typical or average year, weather file within the software) to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at an at least hourly interval for a typical year.

- 7.91 Target illuminance (ET) should be achieved across at least half of the reference plane in a daylit space for at least half of the daylight hours. Minimum Target Illuminance (E<sub>TM</sub>) should also be achieved across 95% of the reference plane for at least half of the daylight hours; this is the minimum target illuminance to be achieved towards the back of the room. BRE target illuminances are set out in Figure 10.

Room	Target Illuminance (lx) for half of assessment grid
Kitchen	200
Living Room	150
Bedroom	100

**Figure 15 – Target Illuminance levels**

7.92 The Daylight Factor is the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage. This method of assessments considers an overcast sky, and therefore the orientation and location of buildings is not relevant. In order to account for different climatic conditions, Annex A within the BS EN 17037 sets equivalent daylight factor targets (D) for various locations in Europe. The median daylight factor (MDF) should meet or exceed the target daylight factor relative to a given illuminance for more than half of daylight hours, over 50% of the reference plane. Figure 11 shows Daylight Factor guidance relevant to London.

Location	Target Daylight Factor for 200 lx kitchen	Target Daylight Factor for 150 lx living room	Target Daylight Factor for 100 lx bedroom
London	1.4%	1.1%	0.7%

**Figure 16 – Daylight Factor guidance levels for different rooms in London**

7.93 The BRE guidance in respect of sunlight quality for new developments is within section 3.1 of the handbook. The BRE handbook states that the main requirement for sunlight is in living rooms, where it is valued at any time of day but especially in the afternoon. Sunlight is also required in conservatories. It is viewed as less important in bedrooms and in kitchens, where people prefer it in the morning rather than the afternoon. The BRE guide states that, in general, a dwelling will appear reasonably sunlit provided at least one main window wall faces within 90 degrees of due south, and a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March (spring equinox).

7.94 In order to comply with BRE guidance, an amenity area should receive more than 50% coverage of sun-on-the-ground for 2 hours on 21 March (spring equinox).

7.95 The assessment submitted with the application assesses daylight and sunlight impacts with potential future consented schemes within the Wood Wharf Masterplan included to indicate a “worst case” scenario.

7.96 The submitted internal daylight and sunlight assessment has been reviewed on behalf of the LPA by an independent third party consultant.

7.97 *Daylight*

7.98 All relevant spaces and rooms within the development were assessed and the results are summarised as follows:

Room type	Rooms meeting living room recommendation	Rooms meeting kitchen recommendation
Studios with kitchenette	438 of 448 (98%)	428 of 448 (96%)
Studios without kitchenette	414 of 464 (89%)	-
Living rooms	9 of 9 (100%)	-
LKDs	93 of 93 (100%)	89 of 93 (96%)

**Figure 17: Summary of daylight results for studios, LKDs and Living rooms.**

7.99 Only 20 of the 448 rooms with a kitchenette fall below the recommended levels and these rooms are located at levels 10 to 19, facing onto Plot C1 to the west of the site, it is noted that 10 of these rooms would be able to meet the requirements for a living room, however.

7.100 50 of the 464 studios without a kitchenette, i.e. the cluster rooms, would fall below the recommended levels. 34 of these are located on levels 1-3 facing onto Plot F2 to the east, Plot G1 to the south and Plot C1 to the west. The other 16 are located on levels 4 to 7. The worst affected studios are located on level 1 to 6. It should be noted that these rooms benefit from dedicated LKDs in which the resident could spend time and receive more daylight.

- 7.101 4 of the 93 LKDs fall below the recommended levels for kitchens but all of the LKDs would meet the recommended levels for living rooms. These LKDs are located on levels 1 to 4 and face onto Plot G1 to the south.
- 7.102 All of the amenity floors would meet the required levels for living rooms.
- 7.103 These results are considered to be reasonable by the LPA's independent consultant. Officers are satisfied that the proposed daylighting of the PBSA rooms is acceptable.

*Sunlight*

- 7.104 The results are summarised in Figure 18 below:

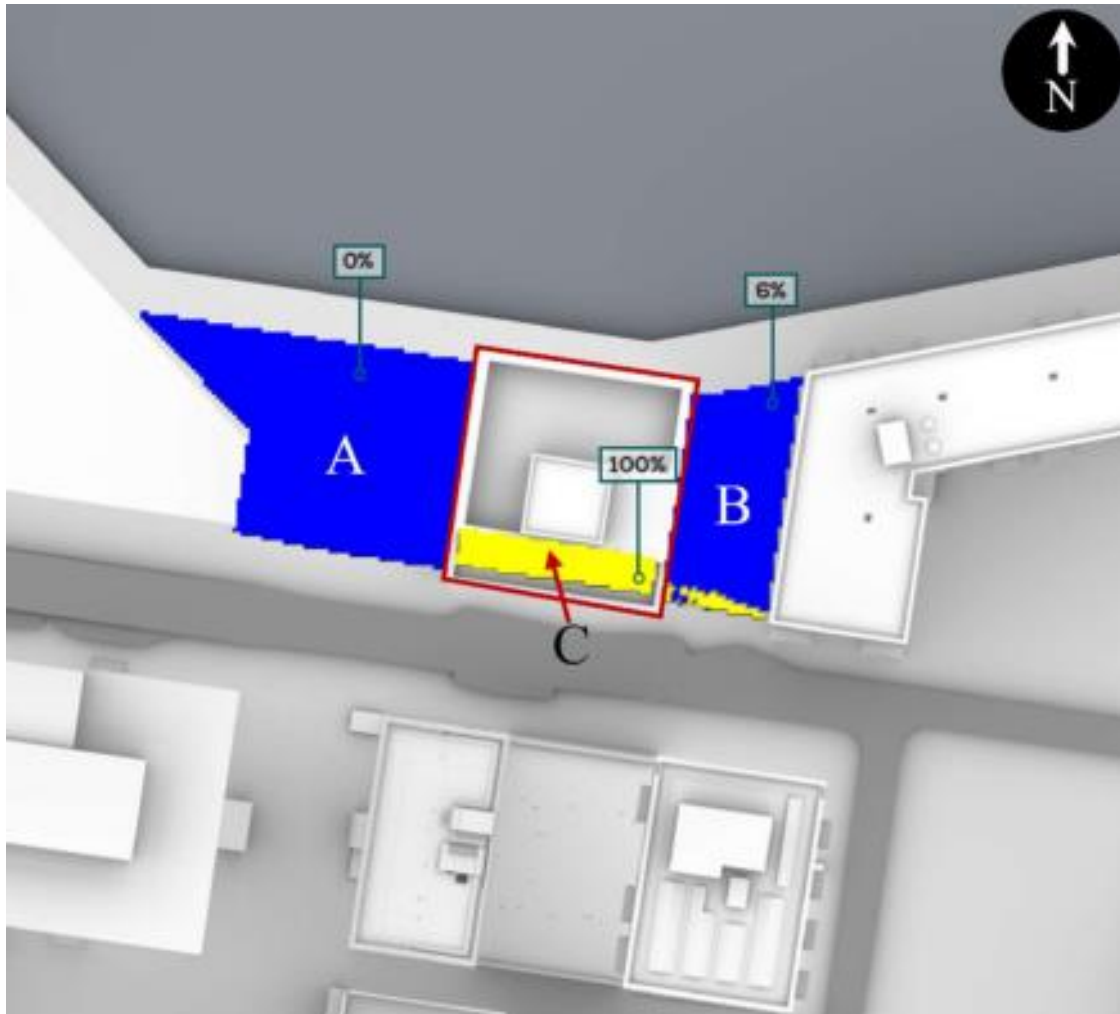
Room type	Rooms meeting at least the minimum sunlight target
Studios	529 of 912 (58%)
Living Rooms	7 of 9 (78%)
LKDs	72 of 93 (77%)

**Figure 18: Summary of sunlight results for proposed studios and living areas**

- 7.105 Of the 912 rooms proposed, just over 58% (529 rooms) would meet the BRE recommendation as to minimum levels of sunlight. However, 72 of the 93 LKDs and 7 of the 9 amenity spaces on the amenity floors would meet the minimum recommendation. Overall, the sunlight provision has been assessed by the LPA's independent consultant to be at an average level. However, officers would note that the rooms on the northern side of the building would be naturally restricted in sunlight terms given their orientation which could explain the low levels of compliance for the studios as compared to other rooms. In mitigation for this they would receive excellent outlook across the Blackwall Basin and beyond. All residents would also have access to the various amenity spaces where high levels of compliance are achieved.
- 7.106 Officers would note that, in respect of both daylight and sunlight, any building that comes forward on the site within any use class would struggle with achieving higher levels of compliance given the consented buildings within the Wood Wharf Masterplan forming the baseline for assessment and the parameter plans for Plot F1 already established within it.
- 7.107 Officers are therefore satisfied that the proposed sunliting of the PBSA rooms is acceptable.

*Overshadowing*

- 7.108 Three amenity/open spaces have been assessed for overshadowing as highlighted in figure 19 below.
- 7.109 Space C, which is the outdoor amenity space on the top floor of the building is fully compliant with the BRE recommendations. This is to be expected given its high vantage point and its south facing aspect.
- 7.110 However, neither of spaces A nor B would meet the guidelines with no part of space A receiving 2 hours of sunlight on 21 March and only 6% of space B doing so. Both spaces are therefore considered to be poorly sunlit. Officers would note that these spaces and the proposed building are all approved within the Wood Wharf Masterplan and so would be restricted in the same way were a building to come forward for reserved matters approval under the outline consent. The proposed building is largely in line with the parameters of the Masterplan and officers are therefore satisfied that these impacts are acceptable, given the extant consent



**Figure 19: Assessed open spaces for overshadowing**

### Design

- 7.111 Development Plan policies require high-quality designed schemes that reflect local context and character and provide attractive, safe and accessible places that safeguard and where possible enhance the setting of heritage assets.
- 7.112 London Plan (2021) policy D3 promotes the design-led approach to optimising site capacity. The policy requires high density development to be in locations well connected to jobs, services, infrastructures and amenities, in accordance with London Plan (2021) D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.
- 7.113 London Plan policy H15 Purpose-built student accommodation requires accommodation to provide adequate functional living spaces for students in terms of the design and layout of bedrooms and provision of high-quality amenity space that offers choice for students. Supporting paragraph 4.15.6 of the London Plan states that student accommodation should achieve high residential quality in line with Policy D3 Optimising site capacity through the design-led approach, which requires, among other things, a safe, secure and inclusive environment, appropriate outlook, privacy and amenity, conveniently located open spaces, and comfortable and inviting indoor and outdoor environments. Overall, student housing should be designed to include a range of flat/room layouts including cluster flats, be designed to meet or exceed relevant standards and provide safe, secure functional, adaptable, and accessible spaces. It should support the health and well-being of students and include the provision of generously sized communal space including attractive, well landscaped outdoor spaces alongside shared leisure facilities and dining spaces.
- 7.114 Tower Hamlets Local Plan policy S.DH1 outlines the key elements of high-quality design so that the proposed development is sustainable, accessible, attractive, durable and well-

integrated into their surroundings. Complementary to this strategic policy, Local Plan policy D.DH2 seeks to deliver an attractive, accessible and well-designed network of streets and spaces across the borough.

- 7.115 When considering the proposed design of the scheme, it should be noted that the proposals are a “drop-in” application to the wider Wood Wharf Masterplan to allow for a use not previously approved under that Masterplan (namely PBSA) to be introduced. The scheme has therefore been designed to largely comply with the design parameters outlined in the Masterplan which have set a benchmark for an acceptably designed building in this location as part of that wider Masterplan.

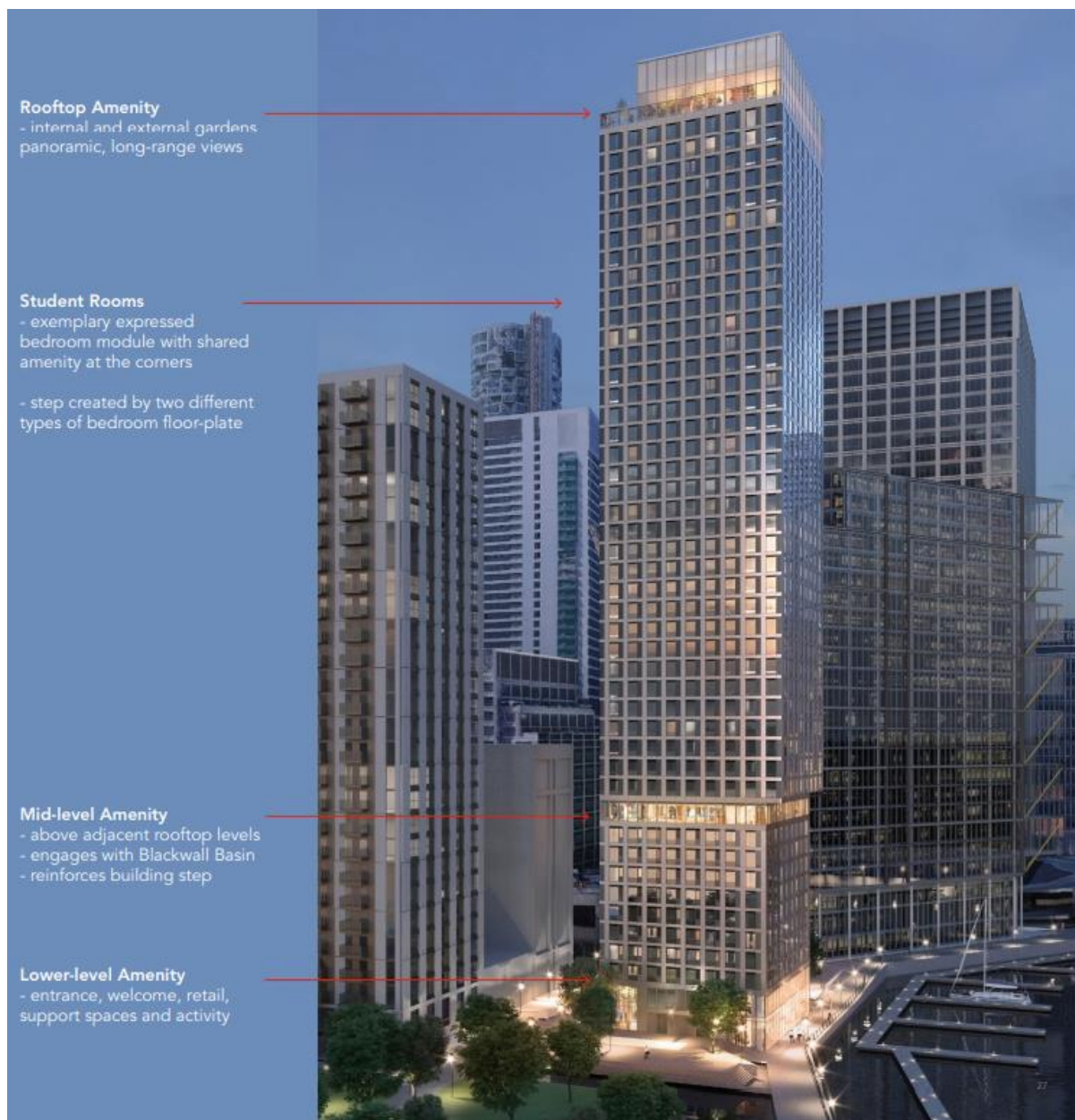
#### Density

- 7.116 London Plan Policies D2 and D3 require optimising site capacity through a design-led approach, whilst taking account of existing and proposed infrastructure. Explanatory text to Tower Hamlets Local Plan Policy D.DH7 makes clear that proposed tall and dense developments are required to consider the criteria set out in Policy D.DH6. The Council’s High-Density Living SPD (December 2020) provides guidance on designing for high density.
- 7.117 London Policy D4 requires that all proposals exceeding 30m high and 350 units per hectare must have undergone a local borough process of design scrutiny. The applicant has engaged extensively with officers at pre-application stage on the design of the scheme, including holding dedicated design workshops which have informed the proposed scheme. However, the scheme has not been presented to the Borough’s Quality Review Panel. The reason for this is that much of the parameters and design intent for the building are already established by the extant consent. The general design of the building in terms of its massing is informed by the extant consent and would comply with that consent, save for a stepping out of the building at level 10 and above which takes the building outside of the parameters under the Masterplan. Therefore, officers felt that it was not necessary to undertake a full design review of the scheme through the QRP.
- 7.118 The application scheme generally reflects guidance in the High-Density Living SPD.

#### Layout

- 7.119 The proposals involve the construction of a single tower building reaching 46 storeys, plus basement. The footprint of the building at ground floor level broadly aligns with the approved parameters of the Wood Wharf Masterplan. The building will be surrounded by new public realm including a boardwalk along the Blackwall Basin to the north of the building and landscaped open spaces to the east and west sides of the building. Brannan Street is located to the south. The building would benefit from a connection across two levels into the existing basement which was developed as part of the wider Wood Wharf Masterplan.
- 7.120 The ground floor will have an entrance to the student accommodation on the southern elevation with a café space on the northern side fronting the Blackwall Basin. These spaces will be double-storey and there will be a mezzanine floor providing amenity space for the students.
- 7.121 The building is arranged around a central core where two sets of lifts and two stair cores will be provided. Circulation corridors will be located around this core with student rooms to the outside of these corridors. Levels 1-8 will provide cluster student rooms with LKDs on each of the four corners serving 5 studio rooms each. All of these rooms will be in the affordable tenure. Levels 10-39 will be a mix of cluster and studio spaces. Again, LKDs will be located in the corners of the building on the south side and will serve 5 bedrooms each. The northern half of the building will be where the studio rooms are located. The clusters at levels 10-26 inclusive would be affordable with the rest of the clusters on levels 27-39 inclusive as well as all of the studios being private let. Finally, level 40-43 provide exclusively studio rooms for private let.
- 7.122 Levels 9 and 44 are amenity space floors where students can benefit from a variety of different types of space. There will be one set of cluster rooms on level 9, this time serving only 4

rooms. Concerns raised about the layout of these spaces across the building is addressed in the Residential Quality section of this report.



**Figure 20: Image taken from Design and Access Statement including explanation of layout**

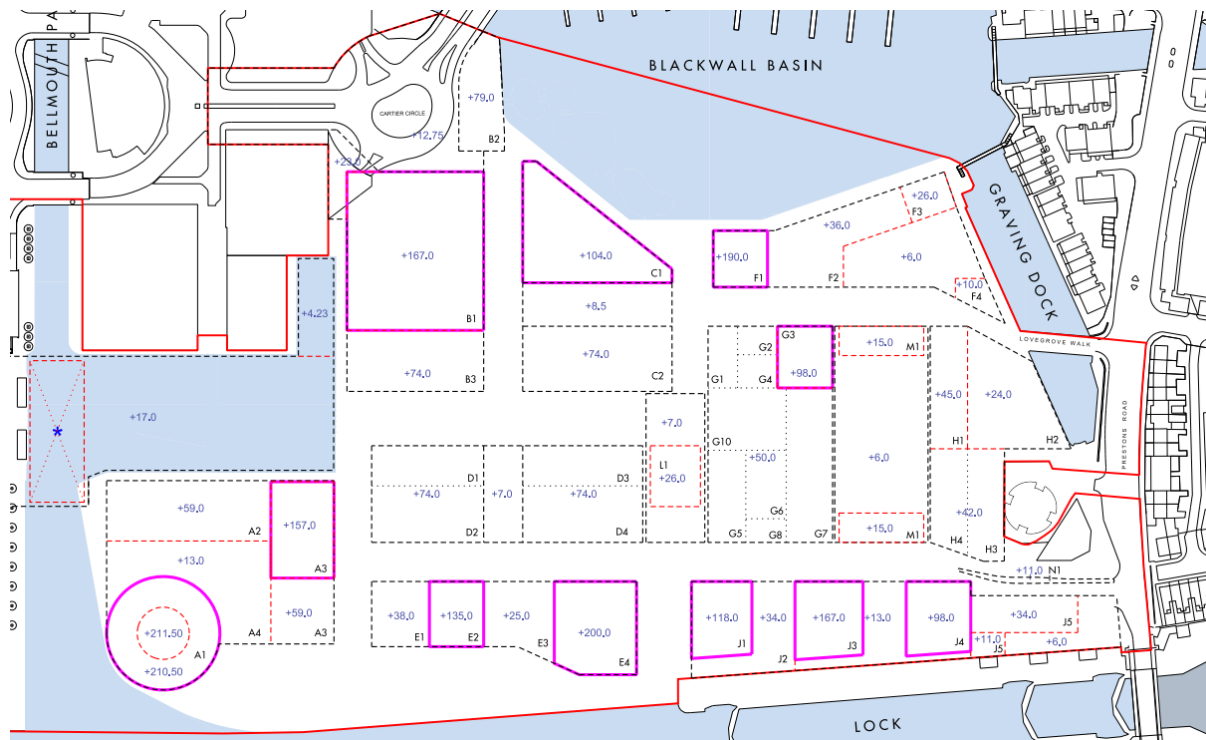
7.123 The design officer raised concerns about the location of the café unit on the northern side of the building and questioned the rationale for doing so. The design officer stated that the unit would be better located on the southern side of the building to provide activation onto Brannan Street as the boardwalk is already going to be an active area by virtue of it being a public space. However, the applicant has decided against moving the space to the southern side and it will therefore remain on the northern side facing the boardwalk. Doing so will allow for spill-out style spaces for tables and chairs within that public realm serving the café and will provide a different type of activation to the space. Locating the main entrance for students on Brannan Street will also make the building more legible as students are most likely to approach from this direction. Officers are therefore satisfied that the appropriate location for the café space is on the northern side of the building.

#### Townscape, Massing and Heights

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

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

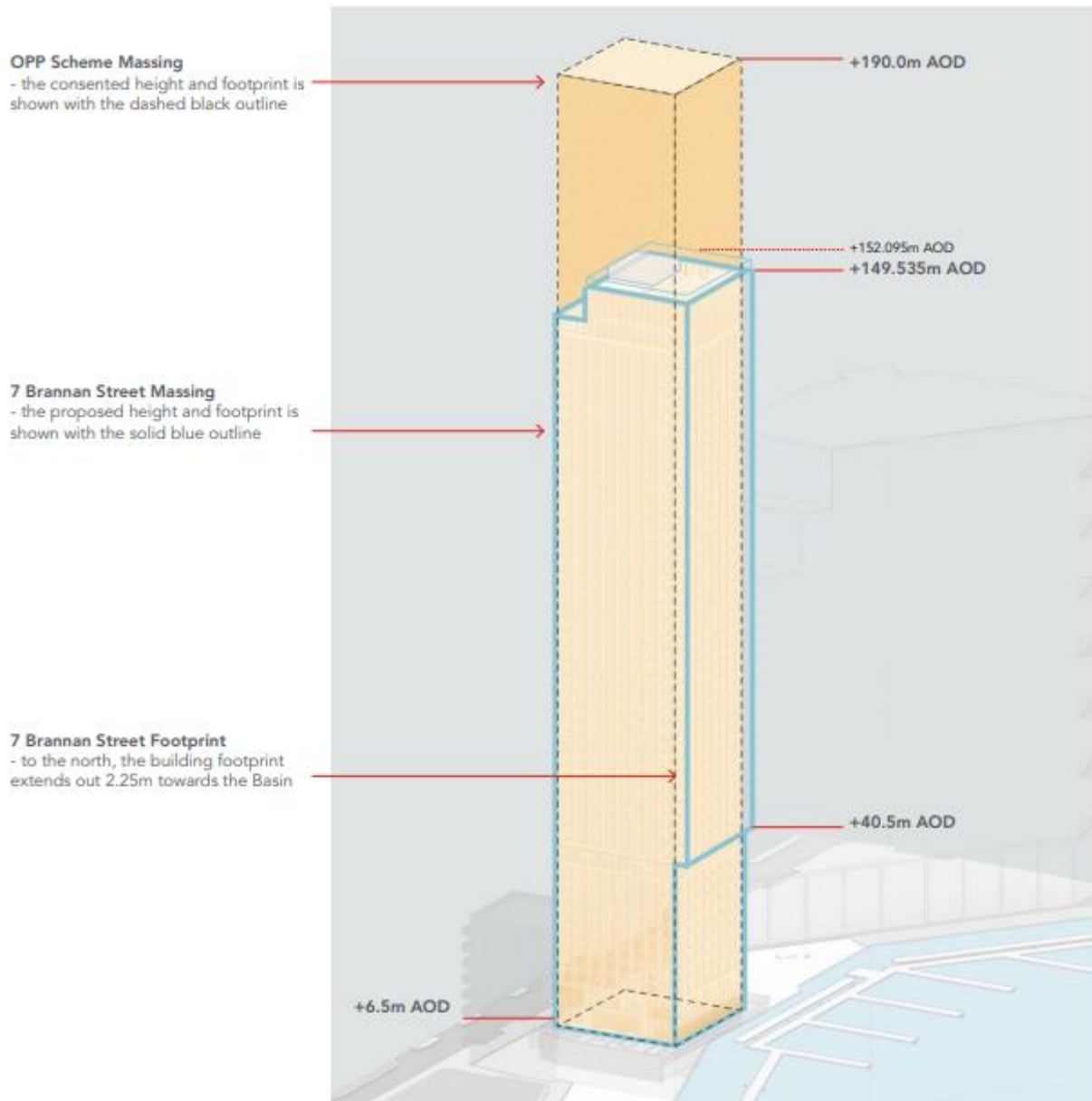
- 7.125 Policy D.DH4 (Shaping and managing views) of the Local Plan requires development to positively contribute to views and skylines that are components of the character of the 24 places in the Borough. This policy seeks to resist intrusive elements in the foreground, middle ground and backdrop of important views. This policy specifically references the need to positively contribute to the skylines of tall building clusters including Canary Wharf and seeks to preserve and enhance local views identified within conservation areas. Townscape views to and from development sites are noted for their importance to the identify and character of a place. Additionally, in the assessment of views, developments must comply with the requirements of the London View Management Framework and World Heritage Site Management Plans.
- 7.126 The Local Plan and Adopted Policies Map identifies a skyline of strategic importance which can be observed from various locations within and across the Borough. Borough designated views are also identified. The designated skyline of Canary Wharf is noted for its distinctiveness and is a prominent and recognisable feature in views from the surrounding area. The Canary Wharf cluster specifically is a globally recognised silhouette and the skyline of strategic importance includes the entirety of the Canary Wharf cluster.
- 7.127 Policy D.DH6 of the Local Plan provides guidance on the development of tall buildings and sets out a range of criteria that must be demonstrated as part of the application process. These relate to overarching urban design, public realm, microclimate, safety and biodiversity strategies to ensure high quality tall building developments. Tall Buildings are directed through this policy to designated Tall Building Zones. The site is located towards the eastern edge of the Canary Wharf Tall Building zone, the boundary of which follows the southern edge of the Blackwall Basin and incorporates the entirety of the Wood Wharf Masterplan area. The Canary Wharf Tall Building zone contains the following principles which are required be followed as part any planning application for a tall building:
- a. Development within this location will be expected to positively contribute to the skyline of strategic importance and maintain the iconic image and character of Canary Wharf as a world financial and business centre.
  - b. Individual buildings should be integrated into urban super blocks set in the public realm.
- 7.128 The principles of the tall buildings policy seek that building heights in the building heights within the Canary Wharf cluster should step down from the central location at One Canada Square.
- 7.129 The immediate context of the application site is the Wood Wharf Masterplan area. As set out in the parameter plans for the Masterplan, a number of buildings across a variety of heights were approved to be built. The maximum parameter heights are indicated in Figure 21 below. As demonstrated on that parameter plan, Plot F1 was envisaged to have a building of up to +190m AOD, which is the third tallest building on the Masterplan.



**Figure 21: approved Masterplan height parameter plan**

- 7.130 Since the approval of those parameters, a number of buildings on the site have received detailed consent, most of which have since been constructed. The tallest of those buildings is One Park Drive which rises to +211m AOD which is located in the southwestern corner of the Masterplan on Plot A1.
- 7.131 The wider context beyond Wood Wharf is that the building would be in relatively close proximity to a number of tall buildings within the Canary Wharf Estate. There are also clusters of other tall buildings around this area of the Isle of Dogs.
- 7.132 The proposed building would rise to +152.095m AOD across 46 storeys and a two level basement. The proposed building would therefore be 38m shorter than the maximum approved height of a building delivered under the currently approved Masterplan. This is demonstrated in Figure 22 below which shows the proposed building against the currently approved parameters.
- 7.133 Regardless of the extant consent, the building's location within the Canary Wharf Tall Building Zone and the fact that it also complies with the requirements of the principle of the stepped down approach from One Canada Square means that the principle of the height of the building is therefore generally supported in policy terms.
- 7.134 The proposed building will step out at level 10 all the way up to the top of the building to accommodate the arrangement of floors at these levels and maximise the number of rooms which can be provided in the building and the quality of those rooms. This stepping out of the building does extend beyond the approved footprint of a building on the plot within the Masterplan scheme which is one of the reasons why a new application is being sought rather than to amend the extant outline parameters. The step-out extends 2.25m away from the façade of the lower part of the building at approximately +40.5m AOD. The floor immediately below the step will be the amenity floor at Level 9 and will be treated with a different primarily glazed façade which delineates the different floor layouts above from the base of the building. The inclusion of the step also introduces visual interest to the building and would be supported.





**Figure 22: Proposed massing against parameters**

- 7.135 The general criteria set out in Tower Hamlets Local Plan Policy D.DH6 Part 1 that all tall building proposals must meet can be summarised as follows: have a proportionate scale, be of exceptional architectural quality, enhance character of the area, provide a positive skyline, not prejudice development potential, ensure a high quality ground floor experience, demonstrate public safety requirements, present a human scale to the street, provide high quality private communal open space/play space, avoid adverse microclimate impacts, ensure no adverse impacts on biodiversity/open space, comply with civil aviation requirements and not have unacceptable impact on telecommunications.
- 7.136 The proposal would introduce a prominent visual addition to the local townscape. The Visual Impact Study (VIS) that forms part of the ES is based on 26 verified views that were agreed with officers. These demonstrate that the tall building would have a distinct cohesive and elegant design divided into a base, middle and top. In terms of addressing the policy;
- a. The proposed development uses the previously consented height under the Wood Wharf Masterplan scheme as a baseline and is of an appropriate height, scale and volume that is proportionate to its location and immediate context, including the design ethos of the wider Wood Wharf Masterplan.
  - b. The proposals represent a high quality of architectural design including high quality materials and detailing. The incorporation of amenity spaces at different levels of the building and a stepping out of the massing introduces visual

interest to the building. Incorporation of BREEAM Outstanding ensures the Proposed Development includes the highest sustainability design credentials.

- c. As stated above the proposal has been comprehensively assessed and scoped through the VIS. The findings are that the development would sit well within the character of the existing townscape and not adversely detract from other local landmarks, heritage assets, key views and other historic skylines, and their settings. The building also sits below the approved height under the Wood Wharf Masterplan and so any negative impacts that could be identified would be significantly reduced as compared to the consented building parameters.
- d. The distinctive, high quality design through its use of robust materials, sustainability measures and lighting scheme would create a landmark scheme that reflects the local context and would be a positive contribution to the skyline.
- e. The proposed building will form part of the wider Wood Wharf Masterplan and has been designed with future development plots in mind. The proposals are largely in line with the approved parameters under the Masterplan and so impacts on neighbouring developments and development plots within the Masterplan have already been established and mitigated within the design of those parameters.
- f. The development has been designed to maximise distances between nearby residential development and is in line with the parameters approved under the Wood Wharf Masterplan. The ground floor will also offer a high quality pedestrian experience with a highly legible building entrance for residents of the building and an active frontage onto the Blackwall Basin through a new café unit. The public realm surrounding the building will also be of a high quality.
- g. The scheme has been designed with security and safety elements in mind providing a detailed lighting/surveillance strategy as well as a fire strategy. As a student led scheme security can be managed and controlled through the use of a student management plan with and ensuring appropriate secured by design measures are secured by condition. In terms of the fire strategy the requirements of Policy D12 have been met, the HSE and London Fire Brigade have raised no objection and there are no particular concerns with the development and a final version would be secured via planning condition.
- h. The double storey height base of the building will provide a human scale to the Proposed Development at street level including activation through highly glazed elements and a commercial unit. The proposed design integrates well with the wider Wood Wharf estate and will allow the public to enjoy an enhanced public realm and legible entrance for students off Brannan Street, the main thoroughfare.
- i. The proposal site will form part of the wider Wood Wharf estate which includes a variety of open spaces and so officers are satisfied that the level of communal open provided in the form of the ground floor landscaping and the roof terrace are acceptable. The landscaping includes play space even though there is no specific requirement to do so and there is a large park space just to the southeast of the site at Harbord Square. The mezzanine space and café will allow students to interact with the general public and amongst themselves.
- j. The potential wind and microclimatic impacts of the Proposed Development have been modelled and tested as part of the Environmental Statement and reviewed by the Councils EIA officer. This concluded that there would be no likely significant wind effects as a result of the Proposed Development, including where the nearby future developments are considered, provided adequate mitigation is secured.
- k. The development does not adversely impact on biodiversity and nearby water spaces which will be addressed later in the report.

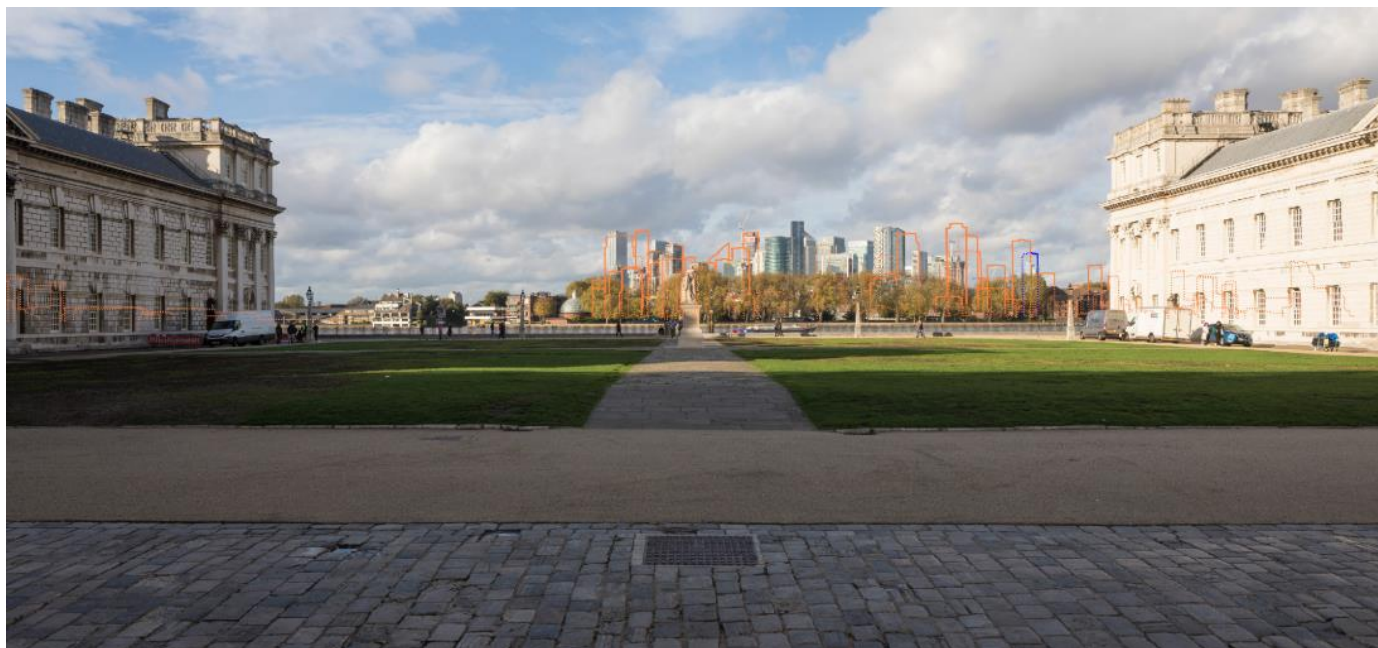
- I. Potential effects on aviation were scoped out of the EIA as the proposed tall building would be significantly below the 1,000 ft (approx. 300 metre) zone threshold within which the Civil Aviation Authority would support an objection to a planning application. Likewise, potential effects of electronic interference on nearby residential properties are unlikely given that the additional 'shadow' that would be generated by the proposed tall building would fall primarily over the same area created by tall buildings at Blackwall and Canary Wharf/Wood Wharf and significant effects are not anticipated. Conditions would be secured to ensure no impact to London City Airport's operation.

7.137 Officers are satisfied that the proposed building satisfies the criteria required for a tall building.

*Impact on designated strategic views*

7.138 The applicant has submitted a Visual Impact Study (Volume 2 of the ES Addendum) which demonstrates how the proposal responds to the context and aligns with the emerging townscape of the area.

7.139 Where visible in long range views, the proposed development would appear consistent with the pattern of development across the Isle of Dogs tall buildings cluster. In longer range views from the west, there would be little or no visibility of the proposed development due to recent development. The proposal would have negligible or beneficial impacts in respect designated views from Primrose Hill and Greenwich.



**Figure 23: Wireline showing proposal (blue) against cumulative schemes from within the Greenwich Royal College.**

7.140 In medium range views, the proposed development would appear as a distinctive and visually interesting addition to the views.



**Figure 24: Image of the proposal as viewed from the Millenium dome view.**

7.141 Finally, in local views from the streets surrounding the site, the proposed development would form a positive addition to the townscape, with a clearly expressed base and active frontages that would address surrounding streets.



**Figure 25: View of building across the Blackwall Basin**

7.142 Whilst the proposal would have a significant (moderate) effect in some views adverse effects these are limited to only three views, one of which is a designated view in the Local Plan (Preston's Road/Stewart Street, Poplar Recreation Ground and Coldharbour South) whereas in all other views the building is considered to have a negligible or beneficial impact. Overall, the proposed development would relate well overall to proposed and consented schemes around the site and would represent a positive addition to the skyline of Canary Wharf. As such, both the GLA and Tower Hamlets officers consider that the tall building would have acceptable visual impacts.



**Figure 26: View from Preston's road. The proposal can be seen rising above the existing tower located on plot G3. The scheme would not be visible in the cumulative scenario.**

7.143 Officers would also note that the impacts of the proposed scheme are lower than those for a building which could be constructed under the Wood Wharf Masterplan by virtue of the reduced height of the building as compared to the maximum approved parameters.

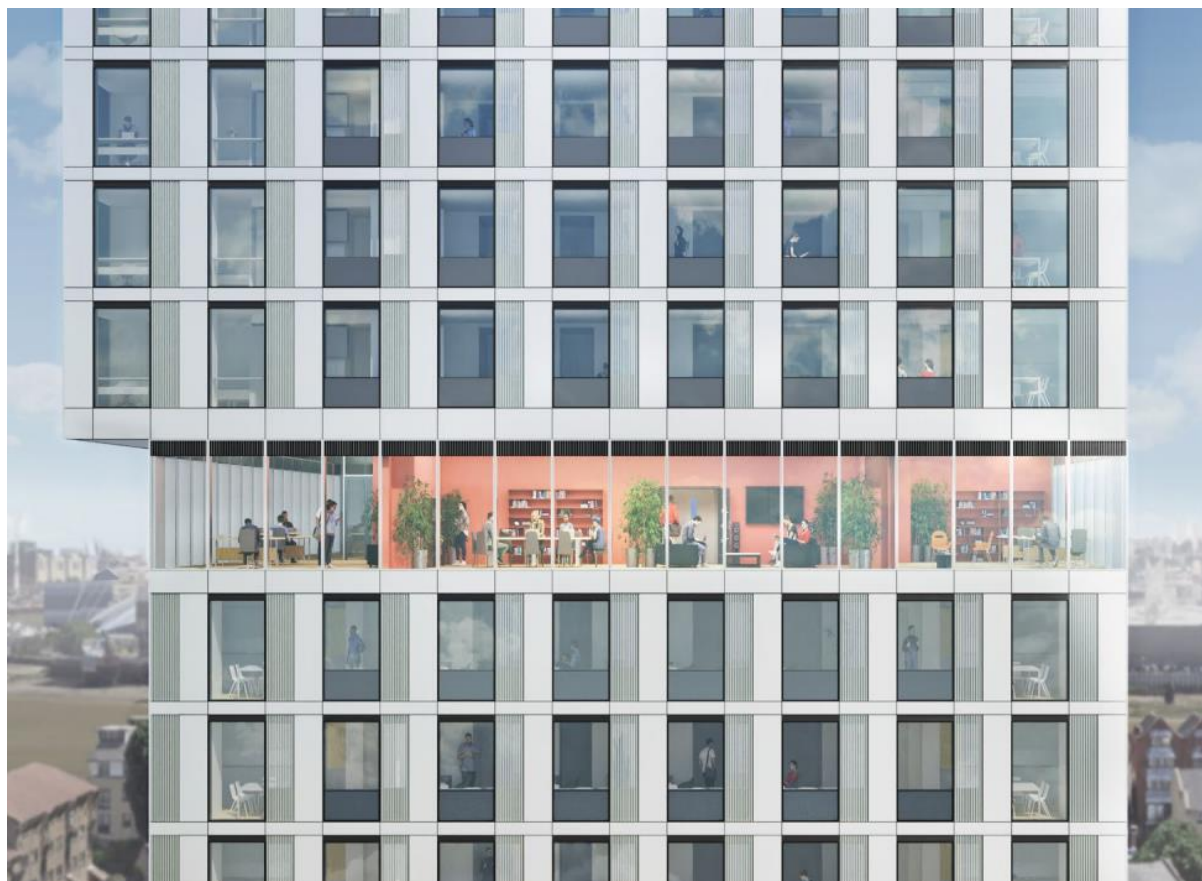
#### Appearance & Materials

7.144 The proposed building will include three distinct sections in a base, middle, top format as required by Local Plan design policies.

7.145 The base of the building is expressed as a two storey fully glazed façade which increases activation of the ground floor plane by allowing views into and out of the building. There will be a mezzanine floor within this area providing amenity and study space for students. The east and west facades at this level are more solid in their centres as this is the location for plant and access for cycle storage as well as other utilities for the building. The activation in these locations would be reduced but the corners will retain the full glazing and be more active. The design officer has raised concerns about the activation of these areas however the more technical and building functional uses operating behind the screening in these locations do not lend themselves to further activation. Windows expressed with vertical screening have been proposed in these locations where possible to continue the architectural language whilst mitigating against some of these concerns.

7.146 The middle of the building contains the student accommodation and is expressed in a regular grid-like pattern formed from the fenestration pattern broken up by vertical and horizontal aluminium cladding. The 9<sup>th</sup> floor amenity spaces will be fully glazed to demarcate it as containing a different element of the use of the building and to provide additional visual interest to the building, in particular at night when the building would be lit internally. This also

highlights the stepped massing and emphasises it as an architectural feature rather than a pure functional one.



**Figure 27: CGI render of the western façade of the building at level 9.**

- 7.147 The building terminates with a double storey height “crown”. The first half of the crown includes a large fully glazed element similar to that of the 9<sup>th</sup> storey but with an increased floor to ceiling height to provide an airier and more pleasant space. It will also incorporate a roof terrace and safety balustrading on the southern side of the building. The upper part of the crown above continues the architectural expression and glazing pattern upwards to provide a perforated plant enclosure. The crown is designed with the intent that it will glow during hours of darkness using elements of translucent glazing to increase this effect.
- 7.148 The GLA have noted that the façade could be better articulated through introducing elements of depth through window reveals. The scheme takes inspiration from the architecture of One Canada Square at the centre of Canary Wharf and acknowledge as a key local landmark. One Canada Square is designed with smooth surfaces whereby its character changes according to the differing levels of reflectivity of its various materials. The proposed scheme will have a similar effect and introducing additional depth to the facades would interfere with this architectural intent.
- 7.149 The resulting building will be constructed from high quality materials and represents a high standard of design.

#### Landscaping & Public Realm

- 7.150 London Plan Policy D8 requires development proposals to ensure that public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, and easy to understand and maintain.
- 7.151 Policy G1 of London Plan expects development proposals to incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network. Policy G5 of the London Plan requires major development proposals to 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. The policy also recommends that predominately residential developments should achieve an Urban Greening Factor (UGF) target score of 0.4.

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

7.153 The proposed scheme includes small areas of landscaping surrounding the building. The area to the north of the building will be constructed as a boardwalk which ties into the existing approved reserved matters application for this element of landscaping which provides a boardwalk along the entirety of the southern edge of the Blackwall Basin, similar to as has been built in the South Dock element of the Masterplan.

7.154 The other elements of landscaping are to the east and west of the building and will include elements of both hard and soft landscaping which tie into the wider landscape strategy of Wood Wharf and will result in a seamless and coherent public realm. The level change from south to north as the site steps down to the Basin will accommodate appropriate step free access. Spill out style seating from the café will also be accommodated within the public realm.



**Figure 28: CGI render of the proposed landscaping scheme.**

7.155 A variety of shade tolerant planting is proposed to be included within dedicated planting areas which delineate the routes down to the Basin. Seating within the public realm has been designed to be integrated within the landscape and aligns with the wider strategy within Wood Wharf.

7.156 The proposed roof terrace will also include a variety of planting and seating areas specifically for the students' use. The seating on the terrace will include elements which can be moved to provide for a variety of functions to meet the students' needs.

7.157 Lighting within the public realm has been designed to tie into the wider Wood Wharf strategy and lighting along the Basin will be of reduced illuminance to ensure impacts on biodiversity are mitigated and reduced.

7.158 Even though there is no formal policy requirement to do so by virtue of the PBSA use, the proposals include elements of playspace which will contribute to the playspace provision of the wider Wood Wharf Masterplan which should be considered to be a public benefit of the scheme. These will be located away from vehicular access and within public open spaces.

7.159 Overall, the proposed scheme only provides an urban greening factor of 0.16 which is below the targets established in London Plan Policy. However, as a drop-in application to form part

of a much wider-reaching masterplan, the applicant has also undertaken an assessment of the Urban Greening Factor if it were considered together with Phase 3 North of the Masterplan, which includes Plot F2 to the east of the site and other landscaped areas which will eventually be completed. With those taken into consideration the UGF would meet the required 0.40. The GLA have also acknowledged this and state that the development must maximise opportunities for greening within the application site. Officers are satisfied that the proposed greening within the site boundary has been fully considered and will form a cohesive approach with the wider estate. The applicant has also agreed to an appropriately worded landscaping condition to require exploration of further greening.

7.160 The proposed landscaping is of a high quality for such relatively small spaces. These areas will be secured as publicly accessible in a s.106 agreement and full details of the final landscaping scheme will be secured by condition.

#### Inclusive Design

Policy 7.2 of the London Plan and policy S.SG2 of the Local Plan seek to ensure that developments are accessible, usable and permeable for all users and that a development can be used easily by as many people as possible without undue effort, separation or special treatment. The key access provisions for the proposed development include:

- Incorporation of the principles for inclusive design wherever possible;
- Accessible routes to all connections with local pedestrian routes and public transport;
- Safe spaces and routes for pedestrians segregated from vehicle traffic;
- Provision of one on-street disabled badge holder car parking space;
- Accessible cycle parking spaces for student residents, staff and visitors;
- Step-free access to all parts of the buildings and landscape, including terraces; and
- The use of the evacuation lifts as part of the evacuation strategy.

7.161 The provision of accessible accommodation is discussed within the quality of accommodation section.

7.162 It is considered that the proposal would result in a scheme that would be well connected to its surroundings and would provide accommodation that can be used easily and with dignity by all.

#### Safety & Security

##### *SBD*

7.163 The application has been reviewed by the Metropolitan Police who have stated that they have held initial conversations with the applicant's design team relating to the security of the scheme and in particular in relation to various elements of the rating of proposed façade/doors/windows, access and CCTV arrangements, as well as the certain aspects of the public realm. Officers would expect conversations between the applicant and the Met to continue following any permission granted as the final details of the scheme evolve as part of continuing secured by design discussions. The usual secured by design condition will be included with any permission to ensure these conversations take place and that proposals attain the highest standards of security.

##### *Fire Safety*

7.164 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. 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. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity



assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. The Mayor of London has also published pre-consultation draft London Plan Guidance on Fire Safety Policy D12(A).

- 7.165 The application has been accompanied by a Fire Statement prepared by Arup and details how the development would achieve the highest standards of fire safety, including details of fire safety systems, means of escape, internal fire spread, external fire spread, access and facilities for firefighting and fire safety management.
- 7.166 Additionally, the applicant submitted a Gateway One Fire Statement, again prepared by Arup, for the purposes of consulting the Health and Safety Executive, the statutory consultee in relation to fire safety as it relates to planning matters for applications of a certain scale.
- 7.167 The GLA, HSE and the London Fire Brigade (LFB) have all reviewed the Fire Statements and raise no objection following clarifications and very minor amendments. The LFB raised a concern regarding the segregation of the two stair cores and the interpretation of Building Regulations which has subsequently been addressed by the applicant via the inclusion of additional doors within corridors to provide additional segregation. The remainder of the concerns raised by the LFB relate specifically to Building Regulations issues and do not fall within the remit of planning considerations and they have subsequently confirmed that they have no objection to the proposals on the grounds of fire safety. Given the HSE are the statutory consultee and raised no concerns and that the LFB are not a statutory consultee on planning applications, those issues raised by the LFB will be subject to further detailed comments/scrutiny at building control stage.

#### Design Conclusion

- 7.168 To conclude it is considered that the scale, height, and massing of the proposal would respond appropriately to the site's strategic role within the Borough and London more broadly.
- 7.169 The form and layout of the proposed building would create a strong relationship with the street and enhance the existing townscape. The architecture is well considered and responds directly to wider surrounds. The materials and appearance of the buildings would be of an exceptional quality and the design would appear as a vibrant addition to the Wood Wharf Masterplan.
- 7.170 The landscaping of the scheme connects well to the wider Wood Wharf estate creating a cohesive public realm. The introduction of soft landscaping and planting will contribute positively to the biodiversity of the area.
- 7.171 In apportioning weight to these benefits, it is considered the scheme design and landscaping carries significant weight in favour of the proposal.

#### **Built Heritage**

- 7.172 Statutory tests for the assessment of planning applications affecting listed buildings and conservation areas are found in Sections 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990. Section 66(1) relates to applications that affect a listed building or its setting. It requires the decision maker to: "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". Section 72(1) relates to applications affecting a conservation area. It states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". There is a presumption that development should preserve or enhance the character or appearance of conservation areas.
- 7.173 London Plan Policy HC1 and Tower Hamlets Local Plan Policy S.DH3 require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.
- 7.174 London Plan policy HC4 seeks to protect strategic views identified in the London View Management Framework. Tower Hamlets Local Plan D.DH4 reiterates this requirement and

requires developments to preserve and positively contribute to the skyline of strategic importance.

#### *Townscape Impacts*

7.175 The Visual Impact Study that forms part of the ES considers and assesses the likely significant effects on above ground heritage assets within a 500m radius of the site in relation to conservation areas and Listed Buildings. The THVIA also considers and assesses the likely significant effects on townscape within 500m of the site, identifying the following six Townscape Character Areas (TCAs):

- Wood Wharf Character Area
- Canary Wharf Character Area
- Blackwall Character Area
- Poplar Dock Character Area
- Coldharbour Character Area
- River Thames Character Area

7.176 The assessment of the effects on built heritage has considered any impact of the proposed development on designated and non-designated heritage assets as listed below and a map indicating locations is included at figure 29:

#### **Conservation Areas**

- Coldharbour Conservation Area
- St Matthias Church Poplar Conservation Area

#### **Listed Buildings**

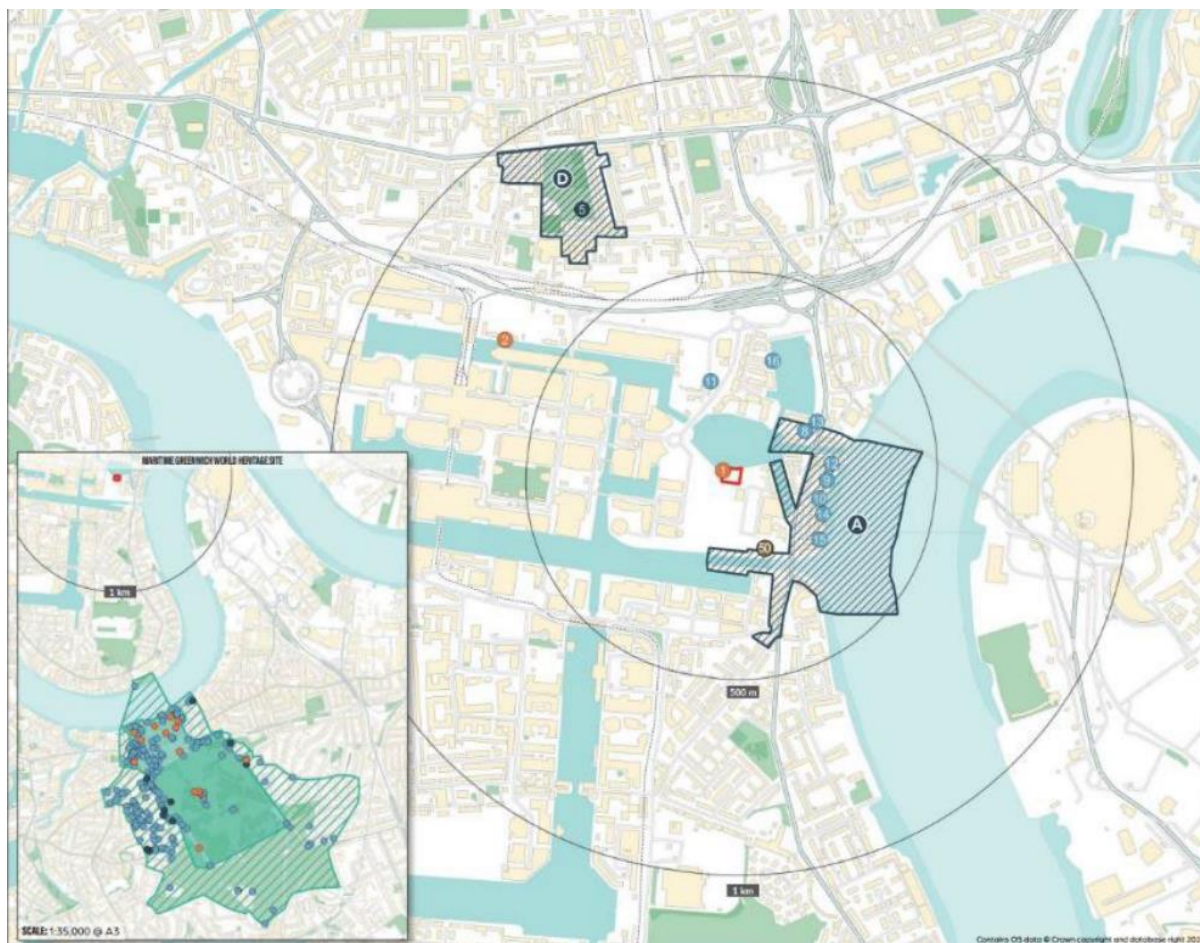
- Blackwall basin – Grade I
- Quay Walls, Copings and Buttresses to Import Dock and Export Dock – Grade I
- Church of St Matthias – Grade II\*
- Bridge House – Grade II
- 3, 5 and 7 Coldharbour – Grade II
- 15 Coldharbour – Grade II
- Isle House – Grade II
- Accumulator Tower to Southeast Corner of Poplar Dock – Grade II
- Blackwall River Police Station – Grade II
- Accumulator Tower on the West Side of Poplar Dock – Grade II
- Poplar Dock Original Eastern Part – Grade II

#### **World Heritage Sites**

- Maritime Greenwich

#### **Non-Designated Heritage Assets**

- Cranes at South Dock



**Figure 29: Map of heritage assets**

- 7.177 As discussed under Design above, none of the Designated Borough Views or strategic views identified in the London Plan would be affected by the proposed tall buildings.
- 7.178 In terms of Townscape Character Areas, the proposal would have a beneficial and not significant effect on all but one of the identified character areas identified. Coldharbour would receive a minor adverse effect which is recommended for mitigation via the use of high quality materials in the façade which would be secured by condition. Officers are satisfied that the impacts on this character area would be acceptable given the site's location within a tall building zone, decrease in height as compared to the extant consent and the mitigation proposed to be secured.
- 7.179 With regards to the conservation areas identified above, the ES indicates that there would be negligible/not significant effects to each of the conservation areas however the GLA consider there to be less than substantial harm to two conservation areas. A very low level of such harm to the All Saints Church, Poplar Conservation Area and a low level of such harm to St Matthias Church, Poplar.
- 7.180 Looking at the listed buildings, the proposed development would have a neutral effect in accordance with the ES chapter on Built Heritage. Again, the GLA would consider there to be less than substantial harm to one of the listed buildings, the Grade II\* Listed Church of St Matthias. This would be at a low level of such harm.
- 7.181 The proposal would have no impact on the non-designated cranes.
- 7.182 Where harm is identified to heritage assets, a balancing exercise needs to be undertaken in line with Paragraph 208 of the NPPF which states that where the proposed development would lead to less than substantial harm to the significance of a designated heritage asset that harm should be weighed against the public benefits of the proposal. In this case the proposal

represents a number of significant public benefits including the provision of a significant quantum of housing towards the borough's housing targets, 35% of which will be delivered as affordable student bedrooms, various other financial and non-financial obligations including construction apprenticeships, providing a further diversification of uses within Wood Wharf and a significant quantum of CIL. Officers are therefore satisfied that the proposed public benefits of the scheme which will be secured comfortably and considerably outweigh the low level of less than substantial harm presented by the scheme.

7.183 A heritage interpretation scheme is also proposed to be included within the landscaping of the proposals to indicate where the historic Junction Dock was located which is a further public benefit of the scheme.

7.184 In summary, the proposed development would deliver significant public benefits which would outweigh the level of any harm identified to any heritage assets or strategic views and its visual impact within the surrounding townscape does not therefore give rise to any strategic concerns. As such, the tall building would have acceptable visual and heritage impacts.

#### *Maritime Greenwich World Heritage Site*

7.185 The Development is circa 2.6km due north/north-east and would be glimpsed in the background of some views of the World Heritage Site (WHS). The proposed development's form, appearance, and location within such views would be consistent with their existing character. The proposal is outlined in blue in figure 30 below with cumulative schemes outlined in orange.



**Figure 30: View of proposal from LVMF 5A.1, Greenwich park**

7.186 It would clearly belong to the background 'layer' of tall buildings which already exists within such views and it is considered to have no effect on the ability to recognise and appreciate the WHS, and the various elements within it, in the foreground of the views.

7.187 The Development would be consistent with the requirements of the Statement of Outstanding Universal Value and the 'London's World Heritage Sites - Guidance on settings' SPG. In accordance with the London Plan (2016), although it would represent a change to the setting of the WHS, this change would not in any way compromise a viewer's ability to appreciate its Outstanding Universal Value.

7.188 The Development would not adversely affect the visual integrity of the WHS and would have no effect on its Outstanding Universal Value.

#### *Archaeology*

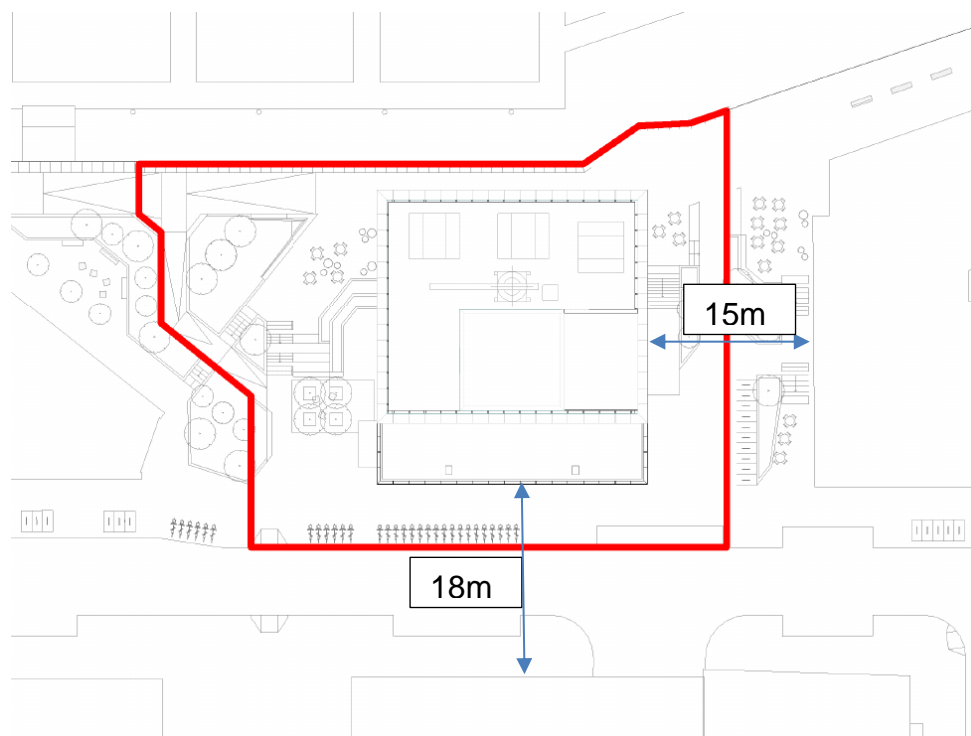
- 7.189 Development plan policies require measures to identify record, protect, and where appropriate present the site's archaeology. The site lies within an Archaeological Priority Area and was referred to the Greater London Archaeological Advisory Service (GLAAS) for their comments.
- 7.190 GLAAS were satisfied with the proposals at this stage and raised no objection to the application subject to a condition being attached requiring the submission of a Written Scheme of Investigation. It is noted that this is in line with the wider archaeological requirements of Wood Wharf and such a condition will therefore be secured with any permission.

### **Neighbour Amenity**

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

#### Privacy & Outlook

- 7.192 The proposed building sits relatively close to the building currently under construction on Plot F2 to the east of the site. Plot F2 also includes windows on its western elevation looking onto the proposal site. The separation distance here is approximately 15m which is 3m below the recommended separation distance to maintain privacy and outlook. However, the proposed building is to be built on a similar footprint as approved under the Wood Wharf Masterplan and so such a relationship has long been established and would therefore not raise concerns as to any unacceptable impact on privacy or outlook. The building on the southern side of Brannan Street is approximately 18m away and therefore of an acceptable distance.



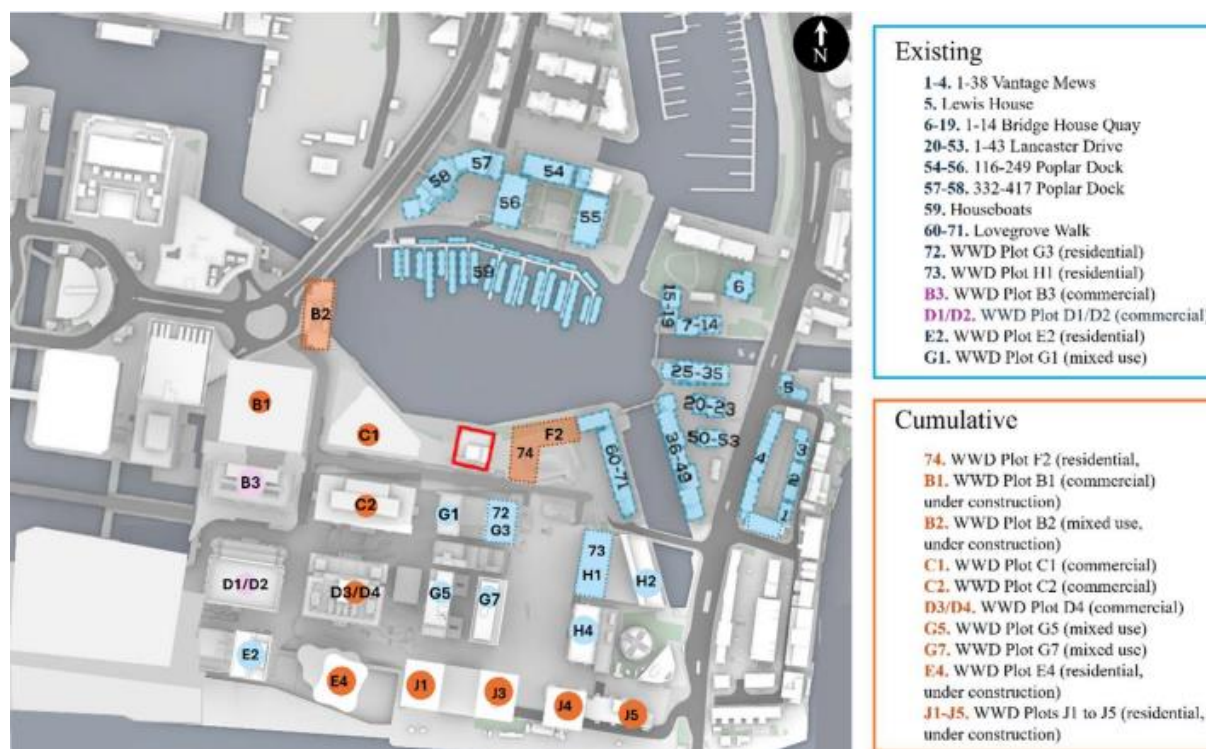
**Figure 31: Image demonstrating separation distance**

#### Daylight, Sunlight & Overshadowing

- 7.193 Guidance relating to daylight, sunlight and overshadowing is contained within the 3rd edition of the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight': a good practice guide' (2022), hereafter the BRE Guide.
- 7.194 To calculate daylight to neighbouring properties, the BRE guidelines, referenced in the Council's Local Plan policies, emphasise that vertical sky component (VSC) is the primary assessment together with the no skyline (NSL) assessment where internal room layouts are known or can reasonably be assumed. For sunlight, applicants should calculate the annual probable sunlight hours (APSH) to windows of main habitable rooms of neighbouring

properties that face within 90° of due south and are likely to have their sunlight reduced by the development massing. For Sun Hours on Ground (SHoG) assessment, the requirement is that a garden or amenity area with a requirement for sunlight should have at least 50% of its area receiving 2 hours of sunlight on 21st March.

7.195 The ES assesses the likely significant impact of the proposal on the daylight and sunlight on surrounding residential properties (sensitive receptors) identified in Figure 32 below:



**Figure 32: Map indicating assessed buildings**

7.196 The BRE guidelines say that changes in daylight and sunlight of 20% or less are negligible and therefore acceptable. There is no industry-standard categorisation for impacts that exceed BRE guidelines. However, for VSC, NSL and ASPH, the Council consistently uses the following categories:

- Reduction less than 20% - Negligible
- Reduction of 20.1% - 29.9% - Minor adverse
- Reduction of 30.1% - 39.9% - Moderate adverse
- Reduction greater than 40% - Major adverse

7.197 The ES adopts the above significance criteria for VSC, NSL and ASPH assessments.

7.198 Daylight effects considered to be 'moderate' or 'major' in scale are determined using professional judgement. The ES considers that a significant effect is either 'moderate adverse' or 'major adverse' in scale (i.e. 'negligible' or 'minor adverse' effects are considered not to be significant in EIA terms).

7.199 The ES assesses a variety of scenarios against a baseline of the current development and a future cumulative scheme with all undeveloped plots stated to their maximum parameters. It also includes additional assessments which include the maximum consented scheme on Plot F1 under the approved parameters of the Wood Wharf Masterplan in order to demonstrate the impacts of the proposed development as compared to a scheme which could be brought forward under the current consent as previously approved.

7.200 The following summary of impacts only includes details of properties where the results indicated anything other than negligible impacts.

### *Lovegrove Walk Receptors*

- 7.201 A total of 83 windows serving 58 rooms were assessed for daylight within the Lovegrove Walk properties (1-21 Lovegrove Walk), 59 of which face the proposed development. Of those windows 16 would fail to meet the BRE guidelines for VSC all of which are first floor windows. These would experience losses of between 21% to 38%. Only 3 windows would receive reductions above 29% and therefore experience moderate adverse impacts. The windows that do not meet the criteria would retain values of between 5% and 17.7%.
- 7.202 All of the assessed rooms meet the requirements as to NSL. The Council's independent review has stated that the overall impact is appropriately assessed at negligible to minor adverse.
- 7.203 Only one window assessed for APSH would fail to meet the BRE Guidelines and would face a reduction of 45.5% during the summer months only. This is considered within the ES to be a minor adverse effect however this could be considered less of an issue as this window appears to light a bedroom. The impact to the Lovegrove Walk Properties in terms of sunlight overall is considered to be negligible.
- 7.204 It is noted that no cumulative assessment with the rest of the Wood Wharf Masterplan has been provided for these properties as they would ultimately be demolished as part of the Masterplan.
- 7.205 However, when the results of the proposal are then compared to the massing approved on the site already the VSC results would be within 1% of the proposed scheme and so there would be no discernible difference.

### *1-43 Lancaster Drive*

- 7.206 These properties are town houses to the east of the proposed development. Of the 274 windows assessed for VSC only 15 would fail to meet the BRE guidelines which are located on the ground and first floors to the rear of numbers 12, 14 and 21-27 Lancaster Drive. Those windows would experience losses of between 21% and 78% with retained values of between 0.2% and 8.1%. From these windows, two at 21 Lancaster Drive and one at 12 Lancaster Drive would be marginally below the guidelines (ratio after/before around 0.79). Some of the windows below the guidelines appear to be located below balconies or areas where daylight is currently constrained; this may lead to the reduced VSC values, although no balcony assessment results have not been reported and it is not possible to confirm this. At 14, 21, 26 and 27 Lancaster Drive one first floor window would be below the guidelines, however the rooms they light have two other windows meeting the vertical sky component guidelines. All of the analysed rooms meet the NSL guidelines.
- 7.207 The overall impacts as to daylight are considered to be negligible to most of the properties but negligible to minor adverse for properties at 12, 14 and 21-27 Lancaster Drive.
- 7.208 The windows assessed for sunlight impacts fully complied with the BRE guidelines.
- 7.209 When considered together with the rest of the Wood Wharf Masterplan, an additional 106 windows and 30 rooms would fall below the BRE guidelines and would therefore assess the overall daylight impacts to be a minor adverse cumulative impact on daylight to 1, 3, 11, 28-31, 31, 32-38, 37, 38, 39, and 40 Lancaster Drive. The Chapter also suggests an overall moderate adverse impact on daylight to 7-9, 12, 23-25 and 39-43 Lancaster Drive. A moderate to major adverse cumulative impact on daylight to 13, 14, 15-20, 21, 22, 26, 27 Lancaster Drive. In respect of sunlight there would be a minor adverse impact for the cumulative loss of sunlight at 10, 11, 22 to 25 Lancaster Drive, a moderate adverse impact to sunlight at 13 Lancaster Drive and moderate to major adverse at 7-9, 12, 14, 15-20, 21, 26, 27 Lancaster Drive
- 7.210 However, when the results of the proposal are then compared to the cumulative assessment and the massing approved on the site already the VSC results would be within 1% of the proposed scheme and so there would be no discernible difference.

### *1-38 Vantage Mews*

7.211 The proposed scheme on its own would fully comply with the BRE guidelines as to both daylight and sunlight.

7.212 When considered cumulatively together with the rest of the Wood Wharf Masterplan, an additional 3 windows and 1 room would fall below the BRE guidelines. Those losses have however been assessed to be negligible and minor adverse in relation to 1-21 Vantage Mews.

*1-14 Bridge House Quay*

7.213 These properties are three and four storey town houses to the northeast of the proposed development. Out of the 113 windows assessed 2 would be marginally below the guidelines for VSC with losses of around 21%. The impacted windows are at 6 and 10 & 12 Bridge House Quay. The windows appear to be located below balconies and so may already be compromised but relevant assessments have not been provided to prove this. Additionally, the windows light rooms that have two other windows which meet the guidelines. For those properties the impacts are therefore assessed to be negligible to minor adverse.

7.214 All rooms met the NSL guidelines.

7.215 All windows assessed also met the requirements as to sunlight.

7.216 When considered together with the rest of the Wood Wharf Masterplan, an additional 23 windows and 2 rooms would fall below the BRE guidelines. The cumulative daylight impact is therefore assessed as negligible at Bridge House (Hotel) and 1, 4-9, 8 and 9 Bridge House Quay; minor adverse at 11&13&14, 13 and 14 Bridge House Quay; and moderate adverse at 6, 7, 10&12 and 11 Bridge House Quay for daylight. 53 out of 63 windows facing southerly would meet the BRE guidelines for both annual and winter probable sunlight hours guidelines. 10 windows would fail to meet annual sunlight hours guidelines, and from these only two would be below the winter probable sunlight hours guideline. The results suggest that three of these windows would light bedrooms; if this is the case, loss of sunlight may be considered less of an issue. Two windows appear to light living rooms, and one would have other windows that meet the guidelines. The cumulative loss of sunlight is assessed as negligible to minor adverse.

7.217 However, when the results for the proposal are then compared to both the cumulative and the massing approved on the site already the VSC results would be within 1% of the proposed scheme and so there would be no discernible difference.

*116-249 Poplar Dock*

7.218 These properties are a 5 and 7 storey blocks of flats to the north of the proposed development. Of the 295 windows assessed 3 would fail to meet the BRE Guidelines as to VSC. One such window would be marginally below the guidelines and the windows appear to be located below balconies and so may already be compromised but relevant assessments have not been provided to prove this. Additionally, the windows light rooms that have two other windows which meet the guidelines.

7.219 Of the 278 assessed rooms, only 3 fall short of the guidelines as to NSL receiving reductions of 28% and 24% which are relatively minor reductions. For 116-209 Poplar Dock the overall daylight impacts are assessed as negligible to minor adverse but negligible for 210-249 poplar Dock.

7.220 As for sunlight, only 8 out of 212 rooms would fail to meet the BRE guidelines as to APSH with a further 8 only failing to meet the guidelines during the winter months. Of these windows 6 appear to light bedrooms where loss of sunlight may be considered less of an issue, and another would benefit from a window which does meet the guidelines. Overall, the loss of sunlight is considered to be negligible.

7.221 When considered together with the rest of the Wood Wharf Masterplan, an additional 96 windows and 19 rooms would fall below the BRE guidelines for daylight resulting in an overall cumulative daylight impact of Moderate to major adverse and a further 8 windows failing to meet the guidelines for Sunlight resulting in an overall cumulative impact of minor adverse.



7.222 However, when the results for the proposal are then compared to both the cumulative and the massing approved on the site already the VSC results would be within 1% of the proposed scheme and so there would be no discernible difference.

#### *332-417 Poplar Dock*

7.223 These properties are five, eight and ten storey blocks of flats to the north of the proposed development. All of the windows and rooms assessed fully comply with the BRE guidelines for both daylight and sunlight.

7.224 When considered together with the rest of the Wood Wharf Masterplan, 98 windows and 12 rooms would fall below the guidelines with regards to daylight resulting in a cumulative moderate to major adverse impact. As regards sunlight, 29 out of 241 windows would fall below the BRE guidelines resulting in a cumulative impact of moderate to major adverse to 332-377 Poplar Dock and moderate adverse to 378-417 Poplar Dock.

#### *Houseboats*

7.225 A number of houseboats are moored on the northern side of the Blackwall Basin. The Houseboats would fully comply with the BRE guidelines as regards both daylight and sunlight.

7.226 When considered together with the rest of the Wood Wharf Masterplan, 26 out of 37 windows analysed would fail to meet the BRE guidelines for VSC which have been assessed as resulting in a moderate adverse for houseboats where windows experience a significant reduction in VSC levels. The sunlight impacts are considered to be minor adverse to houseboat numbers 1, 2, 9, 17, 19, 21, 23 and 25 where one window on each boat fails to meet the BRE guidelines.

7.227 The proposed impacts on the Houseboats are considered to be acceptable, particularly when compared to the difference with the likely impacts of a building built to the maximum parameters of the Wood Wharf Masterplan.

#### *Wood Wharf Plot G3*

7.228 This is a 28 storey building to the southeast of the proposed development. Out of 804 windows assessed a total of 207 would fail to meet the BRE guidelines for VSC receiving reductions in VSC of between 21 and 71% and retaining between 14.4% and 26.6%. Of these 14 would be marginally below the guidelines (ratio after/before between 0.78 and 0.79). For 92 west facing windows which light living rooms, the room they serve has at least one other window meeting the vertical sky component guidelines. Some of the windows below the guidelines appear to be located below balconies, which may lead to the reduced VSC values. 25 out of 281 assessed rooms would fail to meet the BRE guideline as to NSL. Overall, the daylight impacts are considered to result in minor adverse impacts.

7.229 No sunlight assessment has been undertaken as the site is to the north of this building.

7.230 When considered with the rest of the Wood Wharf Masterplan, the impacts would rise to a moderate to major adverse cumulative loss of daylight. 687 windows and 82 rooms would be below the BRE guidelines as to daylight.

7.231 However, when the proposals are then compared to both the cumulative and the massing approved on the site already the results would not be materially different from as currently approved.

#### *Plot H1*

7.232 Plot H1 is a 12 storey block of flats to the southeast of the proposal site. Of the 274 rooms assessed 23 would fail to meet the BRE guidelines for VSC with 17 only marginally below the guidelines. The remaining 6 windows would experience reductions between 23 and 24% and retain values between 11.3% and 14.1%. All rooms assessed met the BRE guidelines as to NSL. The daylight impacts are therefore assessed to be negligible to minor adverse.

7.233 No sunlight assessment has been undertaken as the site is to the north of this building.

7.234 When considered with the rest of the Wood Wharf Masterplan, the impacts would rise to a moderate to major adverse cumulative loss of daylight. 168 windows and 18 rooms would be below the BRE guidelines as to daylight.

7.235 However, when the proposals are then compared to both the cumulative and the massing approved on the site already the results would not be materially different from as currently approved.

#### *Plot F2*

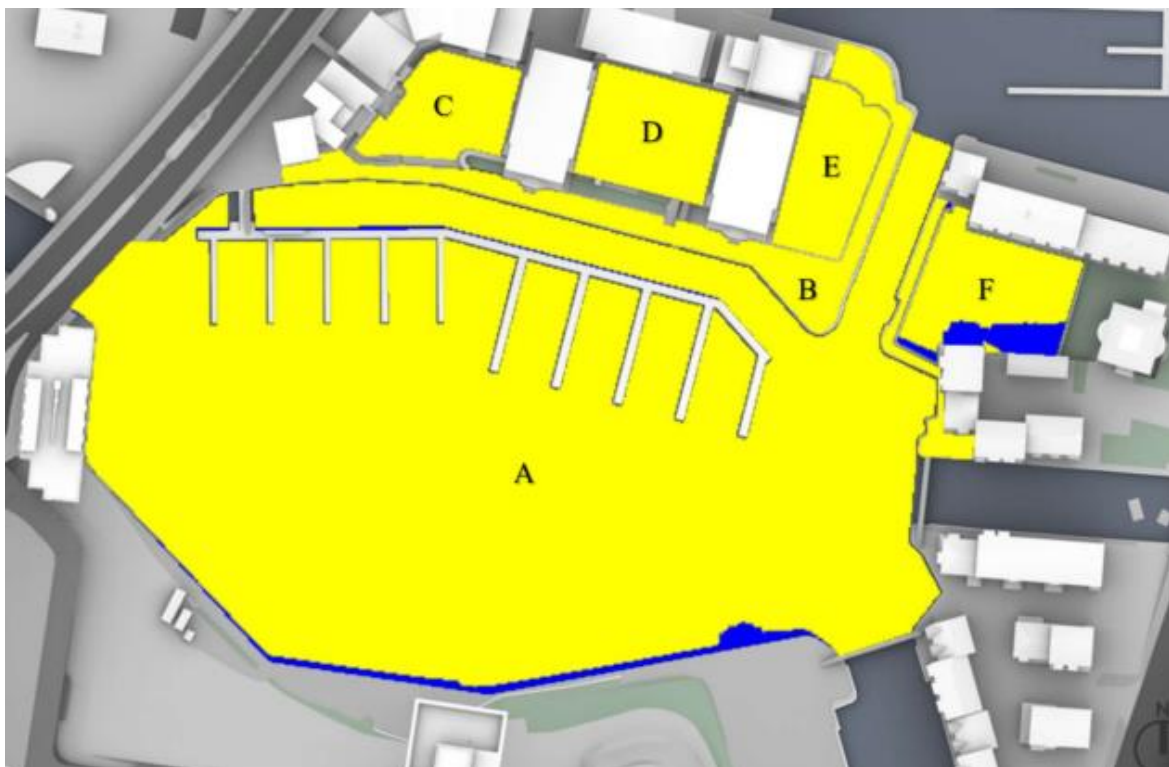
7.236 Plot F2 is a 9 storey block of flats to the east of the proposed development and is currently under construction. Out of 176 windows analysed, 63 would fail to meet the BRE Guidelines as to VSC. All these windows are located on the west elevation of the building facing directly to the proposed development. Results suggest these windows would experience relative reductions in VSC values between 25% and 78%, compared to the 20% guideline, with retained VSC values between 7.8% and 24.2%. Of the 176 assessed rooms, 49 would fail to meet the BRE Guidelines as to NSL facing reductions of between 21% and 81%. The impacts are therefore assessed as major adverse in respect of daylight for the units facing directly onto the site.

7.237 All windows assessed for sunlight impacts comply with the BRE Guidelines.

7.238 However, when the results relating to the proposals are assessed against those for the relevant consented parameters only 46 of the 176 rooms/windows would experience any difference in result and those would not be noticeable. The proposal therefore would have no discernible difference to the approved scheme.

#### *Overshadowing*

7.239 The assessment of overshadowing covers seven distinct open spaces, including the Blackwall Basin (A), Blackwall Walkway North (B), Boardwalk PI (C), Boardwalk PI (D), Boardwalk PI (E), Blackwall Walkway East (F) and Bridge House Quay as highlighted in Figure [ ] below. All of the spaces assessed would continue to receive at least two hours of sunlight over at least half of their area on 21 March and would therefore comply with the BRE Guidelines. This is the case for both the existing condition and a fully developed cumulative Wood Wharf Masterplan.



**Figure 33: Image demonstrating impact on overshadowing as a result of the proposals.**

## Solar Glare

- 7.240 The BRE Guidelines state at paragraph 5.8.1: “Glare or solar dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding.”
- 7.241 Solar glare has been assessed via the times of day and year able to receive instances of reflection at example traffic lanes or signals locations surrounding the site as indicated in Figure 34 below. The proposals would result in negligible impacts at most assessed locations save that there will be minor to moderate adverse impacts at locations 3, 5 and then minor adverse. However, at locations 2 and 4 the LPA’s consultant would assess the impacts to be moderate adverse. Solar glare is likely to be reduced once the Wood Wharf Masterplan is fully completed and developments either side of the proposal block some of the glare at lower levels. At higher levels the glare can be mitigated by deploying the visor in the vehicle.



**Figure 34: Plan indicating locations of assessed views for Solar Glare.**

### *Daylight and sunlight conclusion*

- 7.242 The BRE Guide recommends that a room with 27% VSC will usually be adequately lit without any special measures, based on a low-density suburban model. This may not be appropriate for higher density, urban London locations. The NPPF 2021 advises that substantial weight should be given to the use of ‘suitable brownfield land within settlements for homes...’ and that LPAs 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’. Paragraph 2.3.47 of the Mayor of London’s Housing SPG supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.
- 7.243 It is acknowledged that the proposed development would result in daylight and sunlight impacts on surrounding properties. Officers have reviewed the information submitted and considered the impacts and balanced these against the benefits of the scheme. The application site is located within the Canary Wharf Tall Building Zone and within a site allocation with the expectation that a higher density development and a tall building would be acceptable in principle in this location. The proposal would make a substantial contribution towards strategic housing targets. Additionally, it is noted that an assessment has been

submitted detailing the differences between the maximum development possible on the site under the Wood Wharf Masterplan and one with the proposal replacing any development on Plot F1 the results of which demonstrate no material difference in the previously approved scheme and therefore the impacts of the proposed scheme are materially no different to that of the currently approved scheme. Officers consider the likely significant effects of the proposed scheme on nearby homes to be acceptable on balance.

#### Noise & Vibration

- 7.244 The Council's Environmental Health Officers have reviewed the submitted material. They have concluded that the completed development would not have any unacceptable impacts on neighbouring amenity from noise and vibration provided certain conditions are included on any decision notice. The Student Management Plan would also secure certain noise related measures.
- 7.245 Officers have therefore requested several conditions be attached to the planning permission. These will be attached to any forthcoming consent.

#### Wind/Microclimate

- 7.246 Policy D.DH6 'Tall Building' states: 1. "Developments with tall buildings must demonstrate how they will: [...] j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area".
- 7.247 A wind microclimate assessment was conducted as part of the Environmental Impact Assessment which was reviewed by the LPA's EIA officer. This included wind tunnel testing on both the baseline condition and with the proposed development in existing and cumulative contexts.
- 7.248 That testing identified minor adverse effects at two dedicated seating locations which are proposed to be addressed through mitigation within the landscaping of the proposals at ground level and a pergola at room level on the proposed amenity terrace. That mitigation would result in a reduction of those impacts such that there would no longer be any instances of winds exceeding the safety criteria at the proposed development. It is also worth noting that a taller building of a similar footprint was approved as part of the Wood Wharf Masterplan and so the concept of a building of this sort on this site has already been accepted and is long established.
- 7.249 Subject to securing the appropriate mitigation identified in the EIA Review, the impacts as to wind are acceptable and the proposed would not adversely impact on the microclimate and amenity of the application site and the surrounding in line with policy D.DH6 of the local plan.

#### Air Quality

- 7.250 Tower Hamlets Local Plan Policy D.ES2 requires development to be at least 'Air Quality Neutral' and calls on air quality impacts to identify any necessary mitigation for developments that would cause harm to air quality.
- 7.251 The site is within the borough-wide Air Quality Management Area (AQMA) (NO2 objective and 24-hour mean PM10 objective). The site is not in identified area of low air quality.
- 7.252 LBTH Air quality officers were also consulted on the scheme and raised no immediate concerns with final details to be secured via condition.

#### Construction Impacts

- 7.253 Construction Environmental Management Plan (CEMP) and construction Logistics Plan (CLP) that outlines how environmental, traffic and amenity impacts attributed to construction traffic will be minimised.
- 7.254 The application is supported by a draft Construction Environmental Management Plan which has been reviewed by officers and found to be acceptable and sets out potential security and storage, traffic routeing, loading/unloading areas, delivery times, construction vehicle

restrictions, working times, noise/dust/air pollution control measures and management, monitoring, and review arrangements etc.

- 7.255 The ES assumes that several measures are in place to manage potential environmental effects associated with demolition and construction (including a CEMP). It is therefore recommended that planning conditions secure the implementation of an approved detailed CEMP and Construction Logistics Plan which will need to comply with the Borough's Code of Construction Practice.

### **Transport**

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

#### Vehicular, pedestrian and cycle access

- 7.257 The main student entrance would face directly onto Brannan Street and leads to the reception and the building core meaning it is in a prominent and accessible location for students, who would most likely arrive via Brannan Street rather than the Basin Boardwalk. The proposed development includes public realm proposals improving the pedestrian environment around the site and tying into the Wider Wood Wharf public realm being delivered around the site.

- 7.258 Cycle parking access would be from the western side of the building adjacent to the main entrance. Access to the cycle parking is provided through two compliant lifts down to the second basement level as well as a stairwell with a cycle channel.

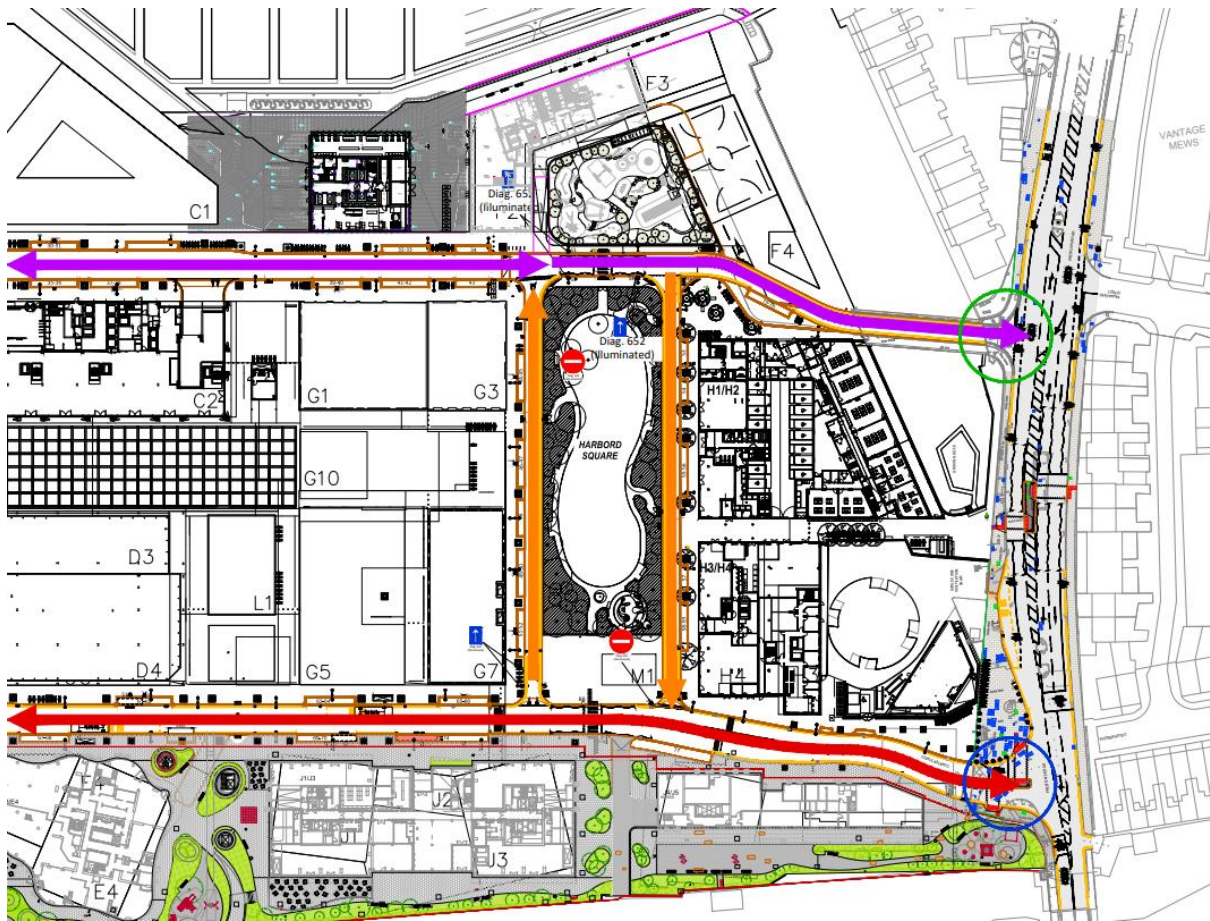
- 7.259 Vehicles would access the proposal site via Brannan Street and the main highway network of Wood Wharf which is established by the Masterplan. The highway within Wood Wharf is all private highway and so no s278 highway works are to be secured.

- 7.260 TFL have suggested that contributions could be secured to deal with improvements to the bus network and pedestrian improvement works to align with contributions which were secured in line with the original Wood Wharf Masterplan permission. Officers would note that those contributions have either already been paid in full or will be paid upon occupation of the plots which are currently under construction. The requisite mitigation they were intended to provide has therefore already been secured and it would therefore not be necessary to secure such contributions in relation to the proposed scheme as no additional significant impacts on the transport network are anticipated above and beyond those which were identified in respect of the Wood Wharf Masterplan permission.

#### Deliveries & Servicing

- 7.261 The application was submitted with an outline delivery and servicing plan which has been reviewed by both TFL and the borough's Highways officers. Deliveries and servicing will take place from Brannan Street which is part of the private highway network of Wood Wharf and will therefore have no impact on strategic or local highways.

- 7.262 Access to Wood Wharf is provided either from Cartier Circle and Trafalgar Way to the northwest of the site or from the east via the Preston's Road junction which will be provided at completion of the Masterplan.



**Figure 35: Servicing/vehicular access following completion of Wood Wharf Masterplan.**

- 7.263 Loading bays have been strategically located around the Wood Wharf Masterplan site to account for the servicing needs of the various buildings being delivered, including one on the north side of Brannan Street close to the proposal site. This will be used to accommodate the servicing of the building.
- 7.264 The outline deliveries and servicing plan outlines how deliveries will be minimised and consolidated where possible, including the promotion of sustainable delivery methods. This is supported and will be secured via a condition requiring submission of the final deliveries and servicing plan prior to occupation of the building. The applicant has committed to further exploring the feasibility of how the river network can be utilised in making deliveries to the site and will be secured in the final plan.

#### Car Parking

- 7.265 London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity and that appropriate levels blue badge parking should be provided within the development. Tower Hamlets Local Plan policy D.TR3 requires all residential developments to be permit free and that all parking associated with the development should be provided off-street.
- 7.266 Officers are satisfied that additional provision of blue badge spaces can be accommodated in line with London Plan Policy T6.1E without the need for submission of a Parking Design and Management Plan upfront at application stage. This will however be secured via planning condition.
- 7.267 The proposal will be 'car-free' and 'permit-free'. In terms of parking for disabled persons, two accessible parking bays are to be provided which include one for the student accommodation use and one for the café use. These will be supplied with electric vehicle charging in line with policy and will be secured via the s.106 agreement.

#### Cycle Parking and Facilities

7.268 Cycle parking will be provided in the following quantities:

Use Class	Number of long stay spaces	Number of short stay spaces
Student Accommodation	456	23
Commercial	2	9
Total	458	32

**Figure 36: Cycle Parking numbers**

- 7.269 Long stay Cycle parking for the student accommodation will be provided at basement level in line with the wider strategy for the buildings being constructed on the Wood Wharf Masterplan. The quantum provided falls short of the requirements set out in the London Plan for student accommodation however this has been accepted by the GLA. The Student long-stay provision will be split 50/50 between standard cycle parking and free-to-hire cycles for students without their own cycles to use free of charge, each of which will be accommodated in their own storerooms. This approach was taken and accepted at 30 Marsh Wall and is an appropriate response to the generally low uptake of personal cycle parking in student accommodation schemes balanced against the needs to encourage sustainable modes of transport. An obligation will be secured to monitor the use of the cycle storage such that free-to-hire spaces can be converted to standard cycles should the need arise. Those free-to-hire cycles will also be maintained and replaced by the applicant to be secured by obligation.
- 7.270 The long stay parking will be split across an acceptable mix of Sheffield and two-tier stands including the provision of 12 spaces in each store for adaptable cycles.
- 7.271 Long stay cycle parking for the retail use will be accommodated via a Sheffield stand located within the unit itself.
- 7.272 Short stay cycle parking for both uses will be accommodated in the public realm through installation of appropriate Sheffield stands.
- 7.273 The final location and detail of all cycle parking will be secured via condition.
- 7.274 The proposals also include the relocation of a Santander Cycle Stand. This will be secured via obligation.
- 7.275 The proposed cycle parking arrangements are all acceptable.

Trip generation

- 7.276 The submitted Transport Assessment (TA) states that the proposed student accommodation scheme is estimated to generate 133 arrivals and departures respectively in the AM peak with 266 arrivals and departures in the PM peak and a total of 2,574 arrivals and departures across a typical day. There are expected to only be 48 daily servicing trips to the student accommodation per day.
- 7.277 In terms of the commercial units, given their combined small size and excluding office use within Use Class E, would not be a major attractor of trips and would serve the students, local residents and pedestrians in the general vicinity of the site. The commercial space would therefore only attract a very small number of infrequent deliveries per week, approximately 3 a day. Staff trips are expected to be outside of the typical peak hours.
- 7.278 The submitted Transport Assessment concludes the proposed scheme is well located to benefit from good access to public transport and ideally located in terms of pedestrian and cycle routes to all amenities. Officers consider that the generated trips by each of the different modes of transport can be accommodated on the surrounding transport infrastructure with negligible impact and that the proposal meets the policy requirements towards sustainable

development and will support and encourage the use of sustainable modes of transport as a result of its design and location.

### Healthy Streets and Vision Zero

- 7.279 It is noted that TfL has launched the Healthy Streets Approach, which aims to improve air quality, reduce congestion and make attractive places to live, work and do business. There are ten Healthy Streets indicators, which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle and use public transport. Alongside the Healthy Streets Approach, the Mayor's Vision Zero aspiration, which aims to eliminate death or serious injury on London's roads, supports changes to our road network to improve the safety of vulnerable road users.
- 7.280 An Active Travel Zone (ATZ) assessment has been provided as part of the TA. The ATZ assessment has been undertaken focusing on the primary walk and cycle routes to key destinations from the site. Each of the routes has been assessed with reference to the Healthy Streets criteria.
- 7.281 The active travel routes to key locations that have been assessed are acceptable and appropriate, as previously agreed with TfL and the GLA. This assessment highlights changes which could be made along these routes in line with the Healthy Streets Approach. TfL have stated that the identified improvements within the ATZ should be secured as part of any permission. However, the identified improvements are either already being delivered as part of the Wood Wharf Masterplan or would not satisfy legal tests for securing via either planning condition or obligation. Identified upgrades to the public highway are too remote to the site to be considered to directly relate to the development and so could not be secured via obligation and would in fact be covered by CIL. Officers are therefore satisfied that appropriate improvements have already been secured and there is no enforceable method for securing further improvements identified in the ATZ.

### Travel Planning

- 7.282 The submitted Framework Travel Plan identifies measures to encourage sustainable travel and it is recommended that the approval and implementation of detailed Travel Plans is secured by planning obligation. A final Student Management Plan which sets out measures of how arrivals and departures are managed to minimise the impacts of these and promote sustainable travel will be secured by condition.

### Demolition and Construction Traffic

- 7.283 The Construction Environmental Management Plan secured via a planning condition would need to consider the impact on pedestrians, cyclists, and vehicles as well as fully considering the impact on other developments in close proximity. Subject to the details being acceptable to TfL and LBTH Highways there would not be an unacceptable impact. The final Construction Logistics Plan would also consider the feasibility of the use of the river network in the construction process.
- 7.284 The impacts of construction on and protection of existing TfL assets including the London Underground will be secured by conditions requiring the submission of plans and details of construction methods and risk assessments.

### **Health and other socio-economic Impacts**

- 7.285 Local Plan Policy D.SG3 states that developments that are referable to the Mayor require to be supported by a Health Impact Assessments (HIA). The submitted HIA (which was included within the assessment made in the ES under the socio-economic chapter) has identified the following positive impacts of the scheme:
- *Housing Quality and Design*: The proposal would deliver much needed student accommodation which positively contributes to local and regional annual housing targets as well as helping to meet local demand for various types of accommodation, encouraging a vibrant resident community. Residents would benefit from functional,



comfortable and energy efficient living including accessible units for mobility impaired users. The proposed layout of the building including a variety of amenity spaces promotes social cohesion between students within the building

- *Promotion of neighbourhood cohesion:* The proposals provide a range of spaces to encourage social cohesion between both the occupants of the building and residents of the wider area. The provision of a café at ground floor encourages activity in the area and will act as a place for residents to meet and socialise.
- *Healthcare:* The Wood Wharf Masterplan has already delivered a new purpose built healthcare facility in the form of a new GP surgery and students would benefit from this.
- *Open Space:* the proposal will provide a new public realm and amenity spaces to meet the needs of residents in an area with an identified deficiency of open space. Including a biodiversity net gain of over 118% including 28 trees
- *Employment:* flexible retail and commercial space generating up to 28 FTE jobs providing opportunities for employment, including for residents. In addition, during the demolition and construction phase, temporary employment opportunities would be generated. The scheme will also bring additional spending to the area, not just for the café within the building but the surrounding restaurants, shops and wider area
- *Pedestrian and Cycling Activity:* strong public transport links and prioritises pedestrian and cycling modes of travel, both in terms of accessing the site and within the site itself thereby encouraging and promoting active travel and exercise;
- *Site Optimisation:* The site is currently cleared and comprises hardstanding with no activity. The proposal will facilitate activity and provide a use for the site.; and
- *Incorporation of Renewable Energy and Sustainability:* inclusion of Air Source Heat Pumps and energy efficiency measures helping to mitigate against climate change impacts and reduce potential for fuel poverty as well as being designed to BREEAM Outstanding credentials.

7.286 The HIA highlights that potential negative impacts potentially resulting from the construction phase such as air quality and noise can be adequately mitigated by the final Construction Environmental Management Plan.

7.287 Officers agree that the proposed development would result in the above positive health comes, which would be secured by several the proposed planning conditions and planning obligations.

## **Environment**

### Energy & Environmental Sustainability

7.288 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 offset through a cash in lieu contribution).

7.289 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.

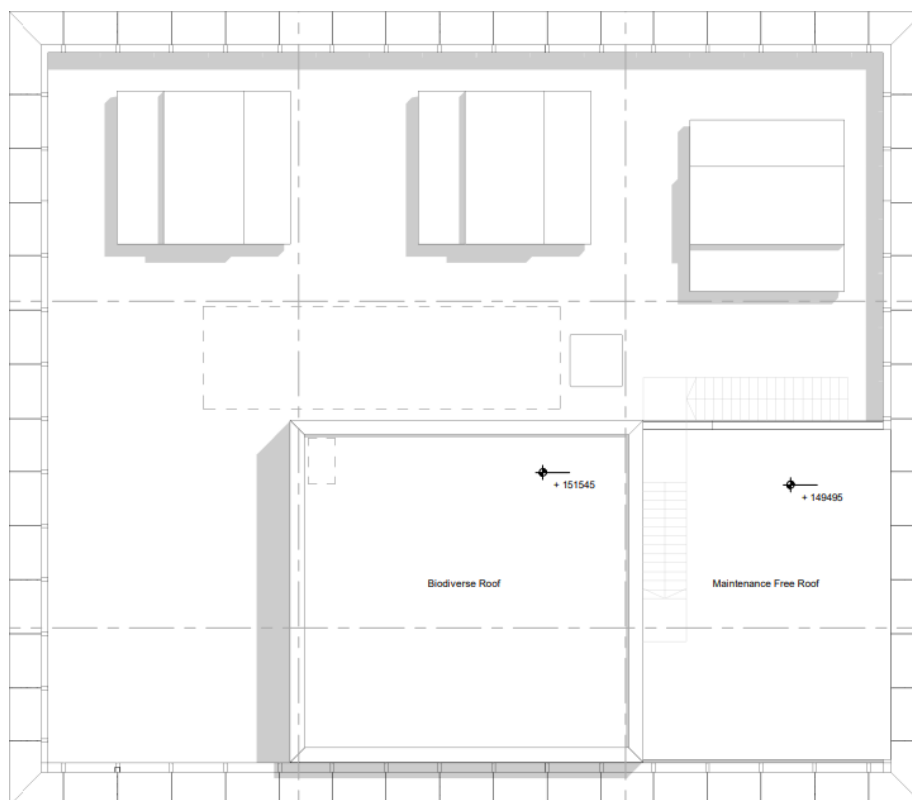
7.290 London Plan Policy SI 2 also calls for major development to be zero-carbon by reducing greenhouse gas emissions by improvements on the 2013 Building Regulations, but by 35% (with at least 10% for residential and 15% for non-residential coming from energy efficiency measures), in accordance with 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.

- 7.291 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.
- 7.292 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.
- 7.293 The application is supported by Sustainability and Energy Statements, Whole Life Carbon and Circular Economy Statements, and the ES (Chapter 7) reports on an assessment of the likely significant effects on greenhouse gas emissions.

### *Energy*

- 7.294 The Mayor of London's Energy Hierarchy is as follows:
- be lean: use less energy and manage demand during operation;
  - be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;
  - be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and
  - be seen: monitor, verify and report on energy performance.
- 7.295 The proposals will introduce various efficiency measures to reduce carbon emissions including:
- a. energy efficiency measures – principally in line with evolving LBTH New Local Plan recommendations, with anticipated space heating at 7 kWh/m<sup>2</sup>/yr.
  - b. efficient heating through air source heat pumps are being proposed in the form of a (centralised) ASHP ambient loop system 'Space heating in the bedrooms is provided by small thermostatically controlled radiators served by low pressure hot water generated by on floor water to water heat pumps.'
- 7.296 'Be Lean.' The Mayor's hierarchy prioritises a 'fabric first' approach, including building orientation and shading, high performance glazing, reduced air permeability and good insulating fabric, together with active and passive measures such as use of high-efficiency LED lighting, Mechanical Ventilation and Heat Recovery (MVHR) and smart meters to reduce energy demand.
- 7.297 'Be Clean.' The applicant has explored connection to the Barkantine Heat and Power Network however connection to this network would not provide a viable solution. The site will provide sufficient space within the plant area to provide a future plate heat exchanger which would assist facilitation to a future district heating network. In respect of site wide heating networks, the proposals include a centralised 'ambient loop' Air Source Heat Pump system. This distributes low temperature water around the scheme which is then upgraded to provide heat and hot water locally, when and where it's required. This system will vastly reduce CO2 emissions and reduce internal gains, which can contribute to internal overheating.
- 7.298 'Be Green.' The proposed ambient loop system would be located site wide with heat pump chillers at roof level. These chillers will be piped to the basement to connect into a thermal store. The thermal store shall then pipe energy via a water to water system storing energy within pump calorifiers. Each student accommodation cluster will be provided with heat pumps which can access the store to in order to provide heating, cooling, and hot water to the rooms.

- 7.299 'Be Seen.' Monitoring will be secured via legal agreement.
- 7.300 Overall, the scheme will deliver a reduction of 29% against the building regulations baseline which is below the 45% target set out in Local Plan Policy D.ES7. However, the scheme has been rigorously examined by the GLA's energy officer to maximise the provision of further sustainable measures which could increase the reduction. However, the applicant has not been able to include any further measures and has maximised energy efficiency measures. The requirements to provide a highly insulated building fabric to comply with building regulations as to overheating and noise reduction has to be balanced against the required carbon reductions. Mechanical ventilation is therefore proposed on the amenity floors where windows are not able to be opened to provide passive ventilation.
- 7.301 It is however noted that the proposals do not include the introduction of renewable energy generation such as solar PV panels. The application documents states that "The provision of PV on the roof area would be tokenistic due to the amount of space available on the roof which is remaining after the subtraction of access routes, plant, and green roof. Application of PV in this area, approximately 82 sqm, will not be able to allocate more than 5 kWp considering the wiring requirements to connect the PV on the basement central cupboard over 140 m away will not make any carbon or commercial viability for this proposal." The applicant has stated that the embodied carbon associated with the introduction of PV would outweigh the benefits to be gained from the use of PV and would therefore actually result in a more inefficient scheme. This has been rigorously tested by the GLA's energy officer and it has been agreed that as part of the detailed design stage a feasibility study would be required to fully demonstrate whether introduction of PV on the roof would be of benefit to the scheme. This will be secured by condition.



**Figure 36: Proposed roof plan demonstrating restricted locations for PV**

- 7.302 One further condition has been requested by the GLA's energy officer to address shortfalls in the energy impacts of the scheme against London Plan policies. The condition would require the applicant to submit a revised Be Lean assessment prior to commencement of the scheme to demonstrate that the energy efficiency of the design of the scheme has been maximised as far as possible to meet the requisite London Plan targets. Such a condition would be secured to any permission to be granted.

7.303 The Borough's energy and sustainability officer has reviewed the proposals and is satisfied that the lower reduction against the policy target is acceptable for the same reasons but also because the applicant has adopted a building design based on different sustainability standards which is supported by the evidence base for the emerging Local Plan and would meet those standards comfortably. A contribution of £253,066 will therefore be secured by s.106 agreement to offset the remaining emissions. Be seen monitoring requirements will also be secured within the s.106 agreement.

#### *Overheating*

7.304 The overheating report demonstrates that the proposed student rooms can comply with CIBSE overheating and the applicant has followed the London Plan cooling hierarchy to achieve this. This meets London Plan Policy SI 4.

7.305 Likely significant Carbon Greenhouse Gas environmental effects. The ES (Chapter 7) identifies a number of proposed mitigation measures for the construction phase (Construction Environmental Management Plan and Construction Logistics Plan) and operational phase (cycle parking, car parking restrictions, Travel Plan, Delivery and Servicing Management Plan, the proposed Energy Strategy, carbon offsetting, BREEAM 'outstanding' standard for the student element). These are discussed in more detail in other sections of this report and it is recommended that they are secured by way of planning conditions and obligations.

7.306 Assuming that these mitigation measures are in place, the ES identifies residual Greenhouse Gas (GHG) Emissions of 3,280.74 tonnes of carbon dioxide per annum. It goes on to state that the proposed scheme would contribute a small amount of emissions and would employ commensurate mitigation measures to ensure policy compliance and minimise its contribution to climate change where possible. However, as part of the wider cumulative effects of GHG emissions from all local, regional, national and global sources, the emissions are nonetheless judged to be significant.

#### *Environmental sustainability*

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

7.308 Local Plan Policy D.ES7 requires development to maximise energy efficiency based on the following relevant standards: BREEAM 'excellent' rating.

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

7.310 Building Performance. The Sustainability Statement includes a BREEAM pre-planning assessment (BREEAM New Construction 2018) which demonstrates that the proposed new student units could achieve an 'Outstanding' rating. It is recommended that a planning condition secures this.

7.311 Internal water use. There is a mandatory requirement under Building Regulations Part G of achieving a predicted average household potable water consumption of no greater than 125 Litres per person per day and the applicant proposes to use water efficient sanitaryware and white goods specification. Local Plan Policy D.ES6 seeks to achieve a maximum water use of 105 litres per person per day and a planning condition is recommended to secure this policy objective.

7.312 Construction waste. The ES recommends the implementation of an approved Site Waste Management Plan and It is recommended that this is secured by planning condition.

#### *Circular Economy*

- 7.313 The application has been accompanied with a detailed Circular Economy Statement that sets out key circular economy commitments for the proposed development which include but not limited to as summarised below:
- 7.314 Conserve Resources: The Proposed Development has been designed to ensure that material and resources are effectively used, managed and reduced as far as possible, in accordance with the GLA first principle of the circular economy. The development has also ensured that material quantities and other resources are minimized, responsibly and local sourced throughout the development process.
- 7.315 Eliminate Waste: The Proposed Development has also been designed to eliminate waste generation as far as possible, in accordance with the GLA second principle of circular economy. The development has been designed to be flexible and adaptable, therefore increasing the building durability and longevity and thereby reducing construction, demolition, and excavation waste arising.
- 7.316 Manage Waste Sustainably: The Proposed Development has been designed to manage waste sustainably, in accordance with the GLA third principle of the circular economy. A demolition and construction audit along with a site-specific Site Waste Management Plan, was carried out to help set a target, manage and divert construction waste from the landfill. Moreover, a Re-use and Waste Recycling Plan was submitted with the application which covers normal waste as well as recycling for the building once occupied. which was developed to help with the operation waste of the building during occupation and how it will be segregated and diverted from the landfilled. A sufficient and compliant bin area and appropriately sized bins have been provided to help maximise recycling and the reuse of municipal waste in accordance with the local and GLA requirements.
- 7.317 The proposal exceeds most of the policy requirements in relation to circular economy principals including the diversion from landfill of all excavation and construction waste materials.
- 7.318 Officers consider the above key commitments identified within the submitted Circular Economy Statement to be acceptable and in accordance with Policy SI7 of the London Plan.

#### Waste

- 7.319 Each student will be provided with the appropriate bins to separate their waste into relevant waste streams.
- 7.320 A refuse chute system has been included in the design with access to lobbies on each floor for students to deposit their waste. The refuse chute system travels through the centre of the building into the waste storage area on the Basement level 02. There the waste is separated by waste stream.
- 7.321 Bins will be placed under the chute for the separate collection of refuse and recycling. Once these bins are full, the building management team will replace these with the empty bins within the waste storage area. The full bins will then be compacted using the lever arm in-bin compactor to a ratio of up to 1.5:1.
- 7.322 Waste would be transferred to a designated collection area within the wider basement of Wood Wharf for collection twice weekly. This is in line with the wider waste collection strategy for other Wood Wharf buildings and has been agreed with the Council's waste officer. All waste management on site up until presentation of the bins in the collection location will be undertaken by estate/building management.
- 7.323 The Council's waste and highway's officers have reviewed the proposed waste strategy and raise no objection following initial queries subject to a condition requiring an operational waste management plan to be approved by the Council prior to completion of the development.
- 7.324 As discussed under Environmental Sustainability above, it is recommended that a Site Waste Management Plan for the construction stage is secured by planning condition.

## Biodiversity

- 7.325 London Plan Policy G6 states that 'development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain' and Tower Hamlets Local Plan Policy D.ES3 require developments to protect and enhance biodiversity. The site is directly adjacent to a Site of Importance for Nature Conservation in the form of the Blackwall basin.
- 7.326 The application is supported by a Preliminary Ecological Appraisal which includes a Biodiversity Survey Report and an Urban Greening Statement as well as a Biodiversity Net Gain Assessment including the Statutory Biodiversity Metric. These documents have been reviewed by an independent consultant on behalf of the LPA, given the sensitivity of the site's location adjacent to the Blackwall Basin and the temporary lack of a biodiversity specialist within the Council providing advice to the LPA on biodiversity matters.
- 7.327 The site was previously cleared as part of preparatory works to deliver the Wood Wharf Masterplan in 2015 and therefore comprises a sealed surface, temporary buildings and ruderal/ephemeral vegetation.
- 7.328 Removal of any potential nesting habitat which has been introduced since the site clearance should be undertaken outside the nesting season, or a survey for nesting birds carried out immediately before clearance. This will be the subject of a condition.
- 7.329 The PEA indicates that there could be permanent and long-term negative impacts on existing biodiversity at a local scale. However, these can be mitigated via adequate mitigation measures during construction which are to be secured in documents already secured by planning condition and via delivery of further enhancements to biodiversity.
- 7.330 Policy D.ES3 requires major developments to provide net gains for biodiversity that contribute to the delivery of the Local Biodiversity Action Plan (LBAP). The proposals include a biodiverse roof on the roof, a modular living wall will be installed, wildlife friendly planting will be introduced in the landscaping which will provide a diverse mix of native species, bird boxes and invertebrate habitat will also be included. The outline design for the biodiverse roof is good. It will contribute to a LBAP target to create new open mosaic habitat.



**Figure 37: CGI image of proposed western landscaping**

- 7.331 Final species to be included in the planting palette will be secured by condition to ensure that these will appropriately contribute to further LBAP objectives.
- 7.332 The proposed lighting scheme has been designed so as to minimise the impact of lighting on the Blackwall Basin's biodiversity value and the local bat population. A final lighting scheme

will be secured within the landscaping condition. The building's impact on the Basin in terms of overshadowing will be reduced as compared to a building to be constructed under the extant permission.

- 7.333 The provided Biodiversity Net Gain assessment and metric indicated a possible net gain in biodiversity of 118.7% against a statutory requirement of 10%. Whilst this appears on its face to be a significant gain it only represents 0.12 biodiversity units. The reason for the high gain can be attributed to the biodiversity value of the site as existing being very low and so any introduction of biodiversity measures is likely to contribute a significant increase. The LPA's independent consultant has noted that the calculation of the baseline within the BNG assessment is potentially incorrect. However, the potential different between the results if it were calculated correctly are not significant (approximately 8% reduction). Officers note that, at this stage in the process, the BNG assessment is intended to demonstrate the level of gains that are proposed as compared to statutory requirements. The resultant BNG would still be significantly in excess of statutory requirements and is therefore acceptable. The final BNG plan to be secured would need to demonstrate where the relevant gains would be delivered and how they have been calculated.
- 7.334 Whilst the proposals constitute a very high level of legislative compliant gain in biodiversity, Officers would not consider the BNG to represent a significant gain for the purposes of paragraph 9 of Schedule 7A of the Town and Country Planning Act 1990 (as amended) and does not therefore require the securing of a Habitat Management and Monitoring Plan in line with that legislation. However, a condition will be secured to ensure that the BNG plan required to be submitted to the LPA prior to commencement in line with legislation is complied with.
- 7.335 The Canal and Rivers Trust has raised queries relating to the delivery of BNG to the Blackwall Basin. However, it has been confirmed previously that the Blackwall Basin does not constitute a watercourse for the purposes of the statutory BNG metric calculator and so no BNG is required to be delivered to the basin. This has been accepted by officers on previous applications including the LPA's previous biodiversity officer. The floating planters within the Basin indicated on plans are indicative only and sit outside the redline of the application site.
- 7.336 The proposed landscaping and features for biodiversity will be sufficient to ensure substantial net gains for biodiversity, as required by D.ES3. Full details of all biodiversity enhancements should be subject to a condition.

#### Flood Risk & Drainage

- 7.337 Tower Hamlets Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drainage. Policy D.ES6 requires new development to minimise the pressure on the combined sewer network.
- 7.338 The application is supported by a Flood Risk Assessment (FRA) and Drainage Strategy. The FRA identifies the site as being in Flood Zone 3a (high risk) and concludes that all the proposed uses are appropriate. The Environment agency have commented that the site is protected to a very high standard by the Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year flood event
- 7.339 It is noted that, 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. Neither the GLA nor the EA raised any objection on the grounds of Flood Risk.
- 7.340 To improve flood resilience, the EA recommended that, where feasible, finished floor levels are set above the 2100 breach flood level, which is 5.38m AOD. As set out in the FRA, the internal floor level of the lower basement level will be 0m AOD. This floor is dedicated to plant will be dedicated entirely to the provision of plant and storage rooms only, including cycle storage. The finished floor level of the building on the south side will be +6.50m AOD and so above the EA recommendation however the finished floor level of the commercial space will be just below the recommended 5.38m and set at 5.10m AOD. This is however acceptable given the "less vulnerable" nature of the retail use.

- 7.341 Basement waterproofing may also be required to be designed in accordance with BS 8102 to mitigate the risk of flooding from groundwater, but this is to be assessed at later design stages.
- 7.342 The proposed new surface water drainage strategy would maintain the current flood risk on-site for rivers, tidal, groundwater, surface water, overland flows, canals, reservoirs, sewers and water mains whilst allowing for the increased rainfall potential associated with climate change. The proposed incorporation of SuDS and reduction in surface water discharge rates to the public sewers would be beneficial in contributing to a reduction of flood risk in the area. Neither the Environment Agency nor Thames Water have raised no objections to the proposals and after some clarification the GLA have also accepted the proposal and agreed that the FRA has had regard to the London Plan Drainage hierarchy.
- 7.343 Proposed Sustainable Urban Drainage Systems (SuDS) measures include:
- Areas of blue and brown roof on the building
  - tree planting in tree pits.
- 7.344 No surface water attenuation is proposed within the scheme as it is proposed that surface water runoff is proposed to run straight into the Blackwall Basin. This will need to be agreed privately with the Canal and Rivers Trust but is not of concern to any of the GLA, the EA or LBTH officers. This is also in line with the strategy of the wider Wood Wharf Masterplan.
- 7.345 The proposed scheme is designed to connect its foul water drainage network to the existing Wood Wharf sewerage network which was designed from the outset to manage anticipated flows from planned developments. This is a private sewer network
- 7.346 To minimise water use on site, a number of water reduction measures are included within the proposal including low flow/flush fittings and efficient water supply (e.g. smart meters and efficient appliances etc.).
- 7.347 A SUDS strategy will be secured by condition which will outline the final adopted SUDS measures. With reference to the Tower Hamlet's SFRA, the site is located within a rapid inundation area and as a result, the proposed strategy during a significant overtopping or breach event is to stay within the building. Consequently, a Flood Warning and Evacuation Plan is required to be developed to include the relevant guidance and advice to the residents with regards to the flood risk on the site. It should provide details of the flood warning system, how the plan is triggered and what actions are required. The plan should be reviewed regularly for the lifetime of the development. This will be secured through a condition.

#### Land Contamination

- 7.348 Geo-environmental (Ground Conditions, Groundwater and Land Take and Soils) was scoped out of the EIA. However, the application is supported by a Geoenvironmental Desk Study Report based on a conceptual site model, this sets out the characteristic ground conditions and elements of the surrounding environment and identifies potential sources of contamination, potential receptors of the contamination and potential pathways between them. It is recommended that the Council's standard land contamination remediation and verification report conditions are attached to any planning permission. This would ensure that the application accords with Tower Hamlets Local Plan policy D.ES8

#### **Infrastructure Impact**

- 7.349 It is estimated that the proposed development would be liable for Tower Hamlets Community Infrastructure Levy (CIL) payments of approximately £12,549,548.41 (inclusive of social housing relief and exclusive of indexation) and Mayor of London CIL of approximately £2,301,170.73 (inclusive of social housing relief and exclusive of indexation).
- 7.350 Alongside CIL, Development Plan policies seek financial contributions to be secured by way of planning obligations to offset the likely impacts of the proposed development on local services and infrastructure.



- 7.351 The applicant has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD, as follows:
- £131,788.00 towards construction phase employment skills training
  - £151,416.20 towards end-user phase employment skills training
  - £253,066.00 toward carbon emission off-setting

### **Human Rights & Equalities**

- 7.352 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.
- 7.353 The proposed new student accommodation meets inclusive design standards and 5% will be wheelchair accessible, 5% adaptable and a provision securing up to 5% further adaptation as required. Furthermore, 35% of the units will also be affordable. These standards would benefit future employees and residents, including disabled people. The proposed affordable accommodation would be of particular benefit to students that are socially/economically disadvantaged. It is also considered that the application has undergone the appropriate level of consultation with the public and Council consultees.
- 7.354 The proposed development would not result in adverse impacts upon equality or social cohesion.

## **8. RECOMMENDATION**

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

### **8.2 Financial obligations**

- a. £131,788.00 towards construction phase employment skills training
- b. £151,416.20 towards end-user phase employment skills training
- c. £253,066.00 toward carbon emission off-setting
- d. Monitoring fee

### **8.3 Non-financial obligations:**

- a. Nomination agreement (including signing of the nomination agreement to take place prior to occupation)
- b. Affordable Student Accommodation – 320 rooms (35%) to be secured at equal to or below 55% of the maximum Government maintenance loan for living costs in accordance with the London Plan Annual Monitoring Report (AMR)
- c. Early Stage Review
- d. Accessible Room provision 5% up front, 5% adaptable and 5% as required.
- e. Access to employment
  - 20% local procurement
  - 20% local labour in construction
  - 25 construction phase apprenticeships
  - 1 x end-user phase apprenticeships
- f. Transport matters:
  - Car Free development (residential)
  - Student Travel Plans

- Management and monitoring of cycle parking/free-to-hire cycles including maintenance/replacement
- Relocation of TFL Cycle stand

- g. Public access to the proposed pocket parks
- h. Architect retention
- i. "Be Seen" energy monitoring

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

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

## **8.6 Planning Conditions**

### Compliance

1. Time Limit
2. Development in accordance with approved plans
3. Bird nesting protection measures
4. Noise insulation and plant noise
5. Sustainability measures
6. Non-Road Mobile Machinery registration
7. S61 Construction Restrictions
8. Cleaning gantry equipment shall be retractable
9. Land contamination and remediation
10. Biodiversity Net Gain Plan
11. Development in accordance with identified ES mitigation measures
12. Maintenance of Active Frontages
13. Aviation obstacle lighting required

### Pre-commencement

14. Details of mechanical ventilation (pre-installation of ventilation system)
15. Code of Construction Practice Checklist – includes Construction Environmental Management Plan, Site Waste Management Plan and Construction logistics Plan as well as noise and dust management measures
16. Piling method statement (prior to any piling)
17. Details of Cranes (prior to erection of any cranes)
18. Details of any aerials (pre-installation)
19. Archaeological Written Scheme of Investigation
20. Details of cranes and scaffolding in consultation with London City Airport
21. TFL infrastructure protection
22. Solar PV Feasibility Study
23. Submission of updated Be Lean Assessment.

### Pre-superstructure

24. Detailed drawings and materials
25. Detailed Landscape plans
26. Details of plant
27. Overheating strategy

28. Wind mitigation measures
29. Secured by design
30. Sustainable Urban Drainage Scheme
31. Bird Hazard Management Plan in consultation with London City Airport
32. Details of wheelchair accessible rooms

#### Pre-completion of building works

33. Details of tree planting
34. Details of biodiversity enhancements and maintenance

#### Pre-occupation

35. Noise insulation and plant noise verification
36. Sustainability verification report
37. Details of cycle parking
38. Verification of remediation of land contamination
39. Deliveries and Servicing Plan
40. Operational Waste Management Plan
41. Operational Environmental Management Plan
42. Student Management Plan
43. Parking Design and Management Plan
44. Completion of GLA Whole Life-cycle Carbon assessment templates
45. Completion of GLA post-construction monitoring report for Circular Economy
46. Flood Warning and Evacuation Plan

### **8.7 Informatives**

1. Permission subject to legal agreement.
2. Development is CIL liable.
3. Thames Water – proximity to assets.
4. Whole life-cycle carbon and Circular economy contacts
5. Canal and River Trust contacts
6. TFL Infrastructure contacts
7. PM10 Dust Monitoring details
8. COCP details

## APPENDIX 1

### LIST OF APPLICATION PLANS AND DRAWINGS FOR APPROVAL

103P3-F1-GHA-05001 Rev 00 – Site Location Plan  
103P3-F1-GHA-05002 Rev 00 – Proposed Site Plan  
103P3-F1-GHA-05003 Rev 00 – 3D Redline Plan  
103P3-F1-GHA-05098 Rev 00 – Proposed Basement B2 Floor Plan  
103P3-F1-GHA-05099 Rev 00 – Proposed Basement B1 Floor Plan  
103P3-F1-GHA-05100 Rev 00 – Proposed Ground Floor Plan  
103P3-F1-GHA-05101 Rev 00 – Proposed Ground Mezzanine Floor Plan  
103P3-F1-GHA-05102 Rev 01 – Proposed Level 01 – Level 08 Floor Plan  
103P3-F1-GHA-05110 Rev 00 – Proposed Level 09 Floor Plan  
103P3-F1-GHA-05111 Rev 00 – Proposed Level 10 – Level 19 & Level 36 – Level 39 Floor Plan  
103P3-F1-GHA-05121 Rev 00 – Proposed Level 20 – Level 35 Floor Plan  
103P3-F1-GHA-05141 Rev 00 – Proposed Level 40 – Level 43 Floor Plan  
103P3-F1-GHA-05145 Rev 00 – Proposed Level 44 Floor Plan  
103P3-F1-GHA-05146 Rev 00 – Proposed Level 45 Floor Plan  
103P3-F1-GHA-05147 Rev 00 – Proposed Roof Plan  
103P3-F1-GHA-05200 Rev 00 – GA North Elevation  
103P3-F1-GHA-05201 Rev 00 – GA East Elevation  
103P3-F1-GHA-05202 Rev 00 – GA South Elevation  
103P3-F1-GHA-05203 Rev 00 – GA West Elevation  
103P3-F1-GHA-05300 Rev 00 – GA North\_South Section  
103P3-F1-GHA-05301 Rev 00 – GA East\_West Section  
103P3-F1-GHA-05400 Rev 00 – Typical Bay Study Podium Façade  
103P3-F1-GHA-05420 Rev 00 – Typical Bay Study Amenity Façade  
103P3-F1-GHA-05430 Rev 00 – Typical Bay Study Crown Façade  
103P3-F1-GHA-05440 Rev 00 – Typical Bay Study – Glazed Opening Panel  
103P3-F1-GHA-05441 Rev 00 – Typical Bay Study – Solid Opening Panel  
103P3-F1-GHA-05442 Rev 00 – Typical Bay Study – Corner Type A  
103P3-F1-GHA-05443 Rev 00 – Typical Bay Study – Corner Type B

#### Other application documents

Archaeology Assessment, prepared by RPS;  
Aviation Safeguarding Assessment, prepared by Eddowes Aviation Ltd;  
Circular Economy Statement, prepared by Introba;  
Community Infrastructure Levy (CIL) Additional Information Form, prepared by DP9 Ltd;  
Construction Environment Management Plan, prepared Canary Wharf Contractors;  
Daylight, Sunlight and Overshadowing Report (included within the ES), prepared by GIA;  
Design and Access Statement (including Landscaping Scheme, Lighting and Access), prepared by Glenn Howells Architects;  
Energy Strategy, prepared by ChapmansBDSP;  
Fire Statement, prepared by Arup;  
Flood Risk Assessment and SuDs Report, prepared by Arup;  
Health Impact Assessment, prepared by Quod;  
Internal Daylight and Sunlight Assessment, prepared by GIA;  
Land Contamination Assessment, prepared by Arup;  
Planning Application Forms, prepared by DP9 Ltd;  
Planning Statement, prepared by DP9 Ltd;  
Preliminary Ecological Appraisal (including Urban Greening Assessment), prepared by Greengage;  
Re-Use and Recycling Plan, prepared by Steer;  
Statement of Community Involvement, prepared by Elly Tabberer;  
Student Housing Demand and Supply Statement, prepared by Knight Frank;  
Student Management Plan, prepared by Host;  
Sustainability Statement, prepared by Introba;  
Townscape, Visual and Heritage Impact Assessment (included within ES), prepared by BDP;  
Transport Assessment, prepared by Steer;

Travel Plan Framework and Servicing Delivery Plan, prepared by Steer;  
Utilities Statement, prepared by Arup;  
Ventilation and Extraction Statement, prepared by Chapmans BDSP;  
Whole Life Carbon Assessment, prepared by Introba;  
Wind Impact Assessment (included within ES), prepared by RWDI;

**Environmental Statement – all prepared by BDP unless otherwise stated**

ES Volume 1

Chapter 1: Introduction;  
Chapter 2: EIA Methodology;  
Chapter 3: Area for Development;  
Chapter 4: Proposed Development;  
Chapter 5: Policies, Guidance, Legislation and Standards;  
Chapter 6: Air Quality;  
Chapter 7: Climate Change and Greenhouse Gasses;  
Chapter 8: Heritage;  
Chapter 9: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;  
Chapter 10: Noise;  
Chapter 11: Socio-Economic;  
Chapter 12: Townscape and Visual Impact;  
Chapter 13: Wind;  
Chapter 14: Cumulative Effects;  
Chapter 15: Mitigation and Monitoring;  
Chapter 16: Likely Significant Effects and Conclusion.

ES Volume 2

Townscape and Visual Impact Assessment, prepared by Millerhare

ES Volume 3

ES Technical Appendices

ES Volume 4

Non-Technical Summary

Interim Review Report (IRR) Response Schedule  
Further Review Report (FRR) Response Schedule  
Further Review Report (FRR) 02 Response

## **APPENDIX 2**

### **SELECTION OF APPLICATION PLANS AND IMAGES**



Basement Level 2 Plan

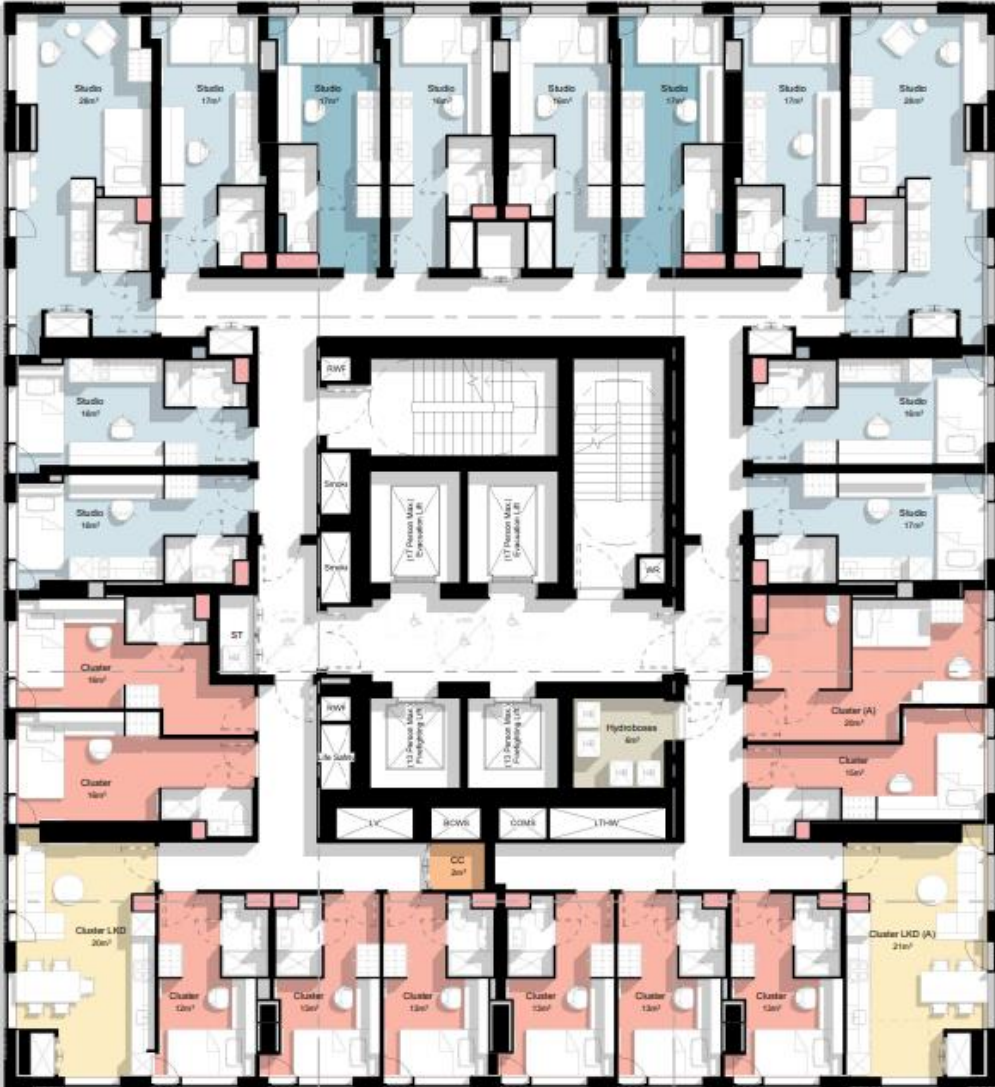
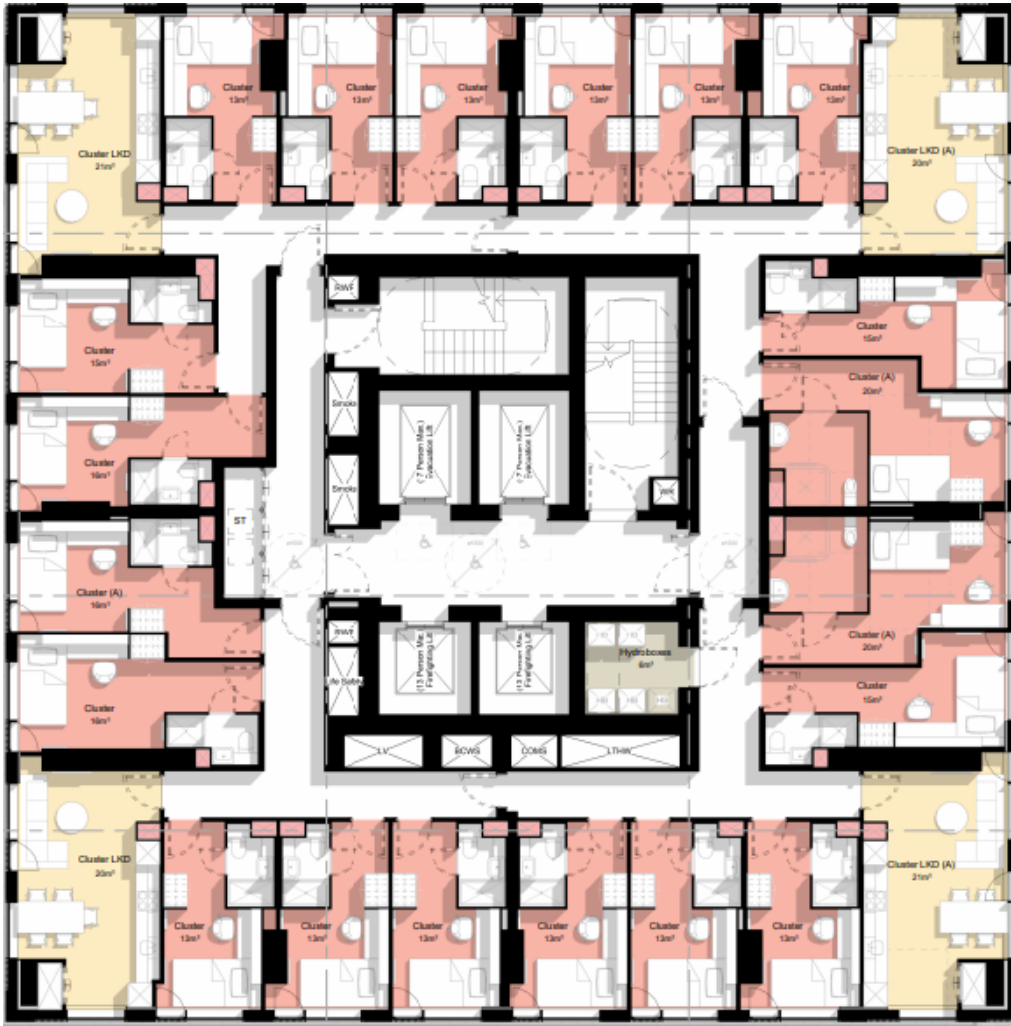


Basement Level 1

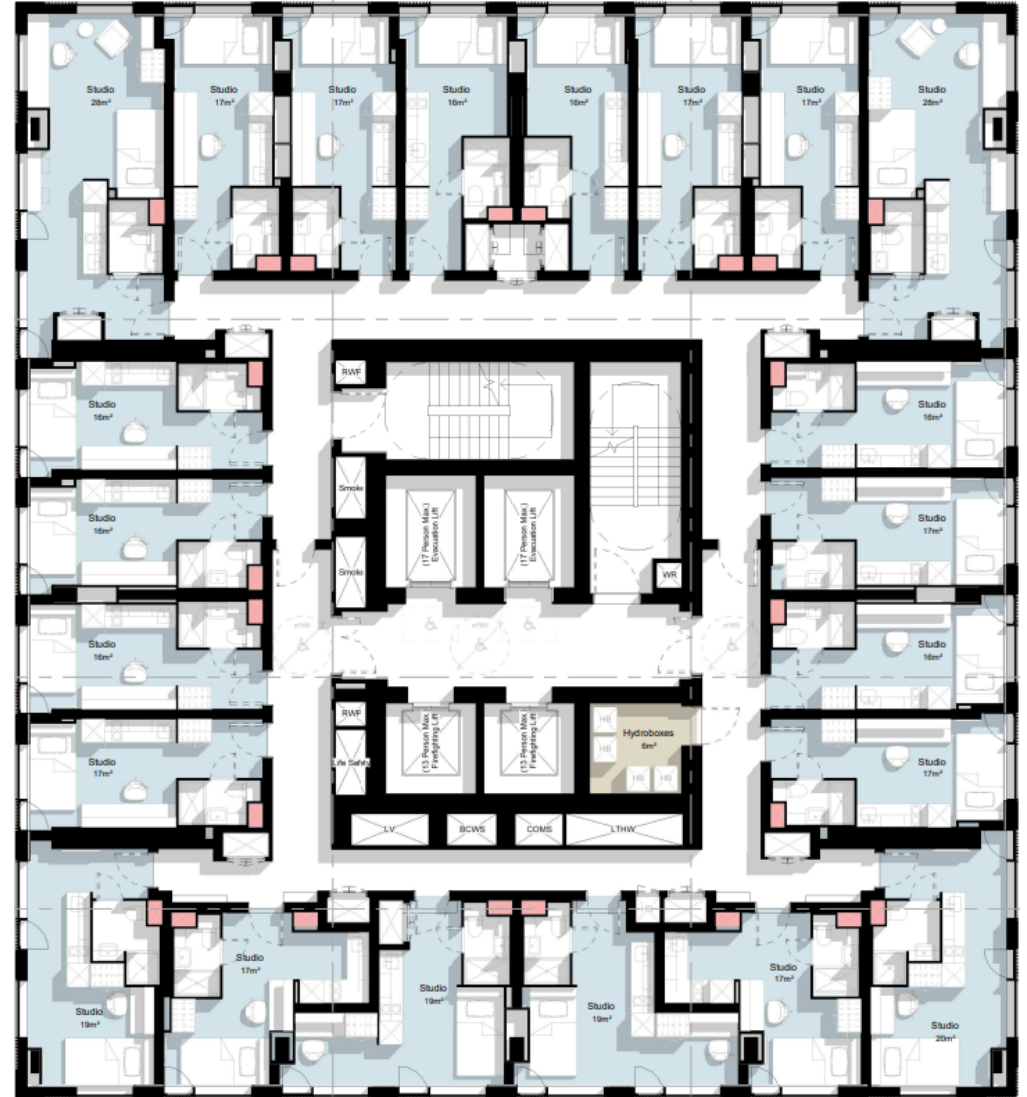
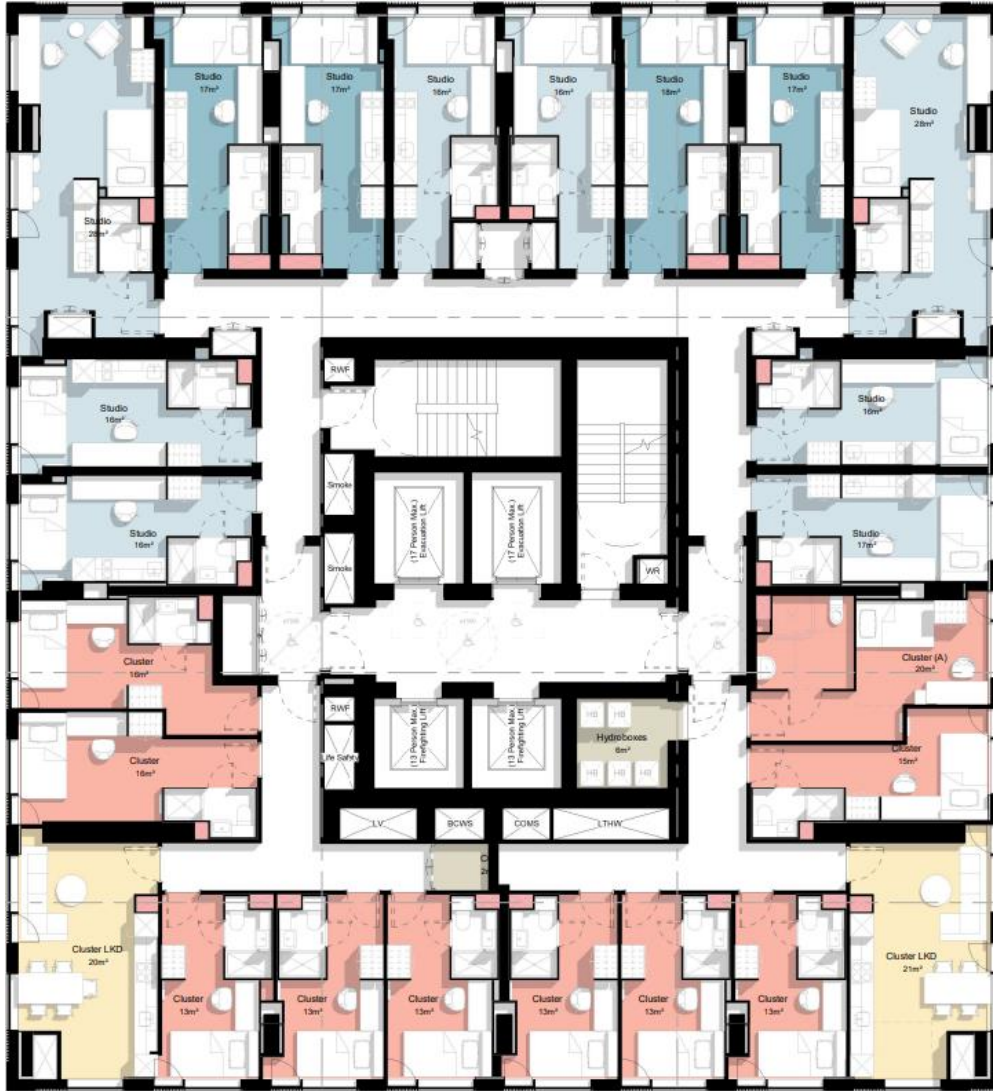




Ground and Ground Floor Mezzanine Plans



Level 01-08 Floor Plan (Left) and Level 10-19 & 36-39 Floor Plan (Right)



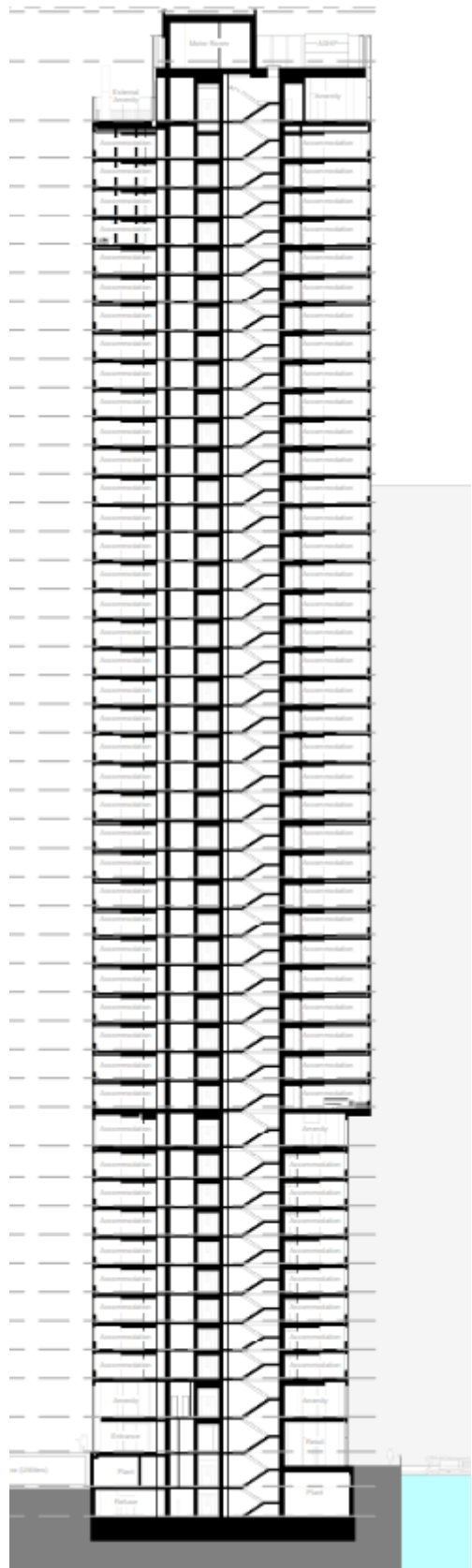
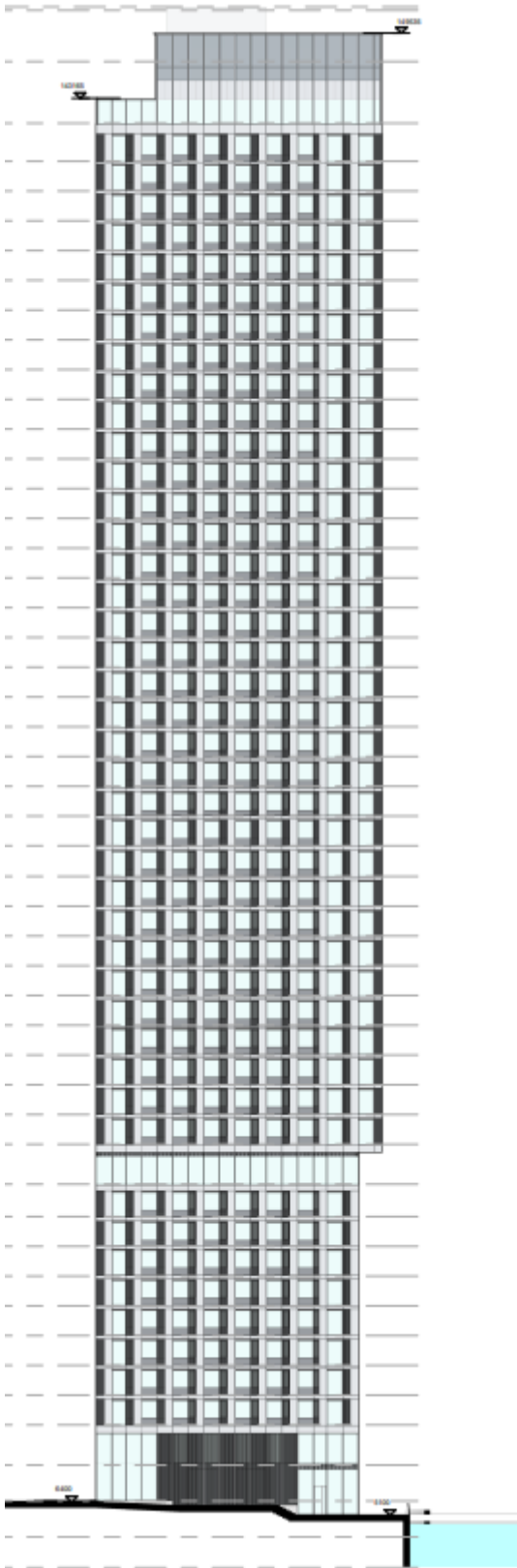
Level 20-35 Floor Plan (left) and Level 40-43 Floor Plan (Right)



vel 9 Amenity Floor Plan (Left) Level 44 Amenity Floor Plan (Right)



CGI Visualisation of Landscape



East Elevation (Left) and North-South Section (Right)



CGI of Proposed Development looking across the Blackwall Basin



CGI of Proposed Development at night looking west

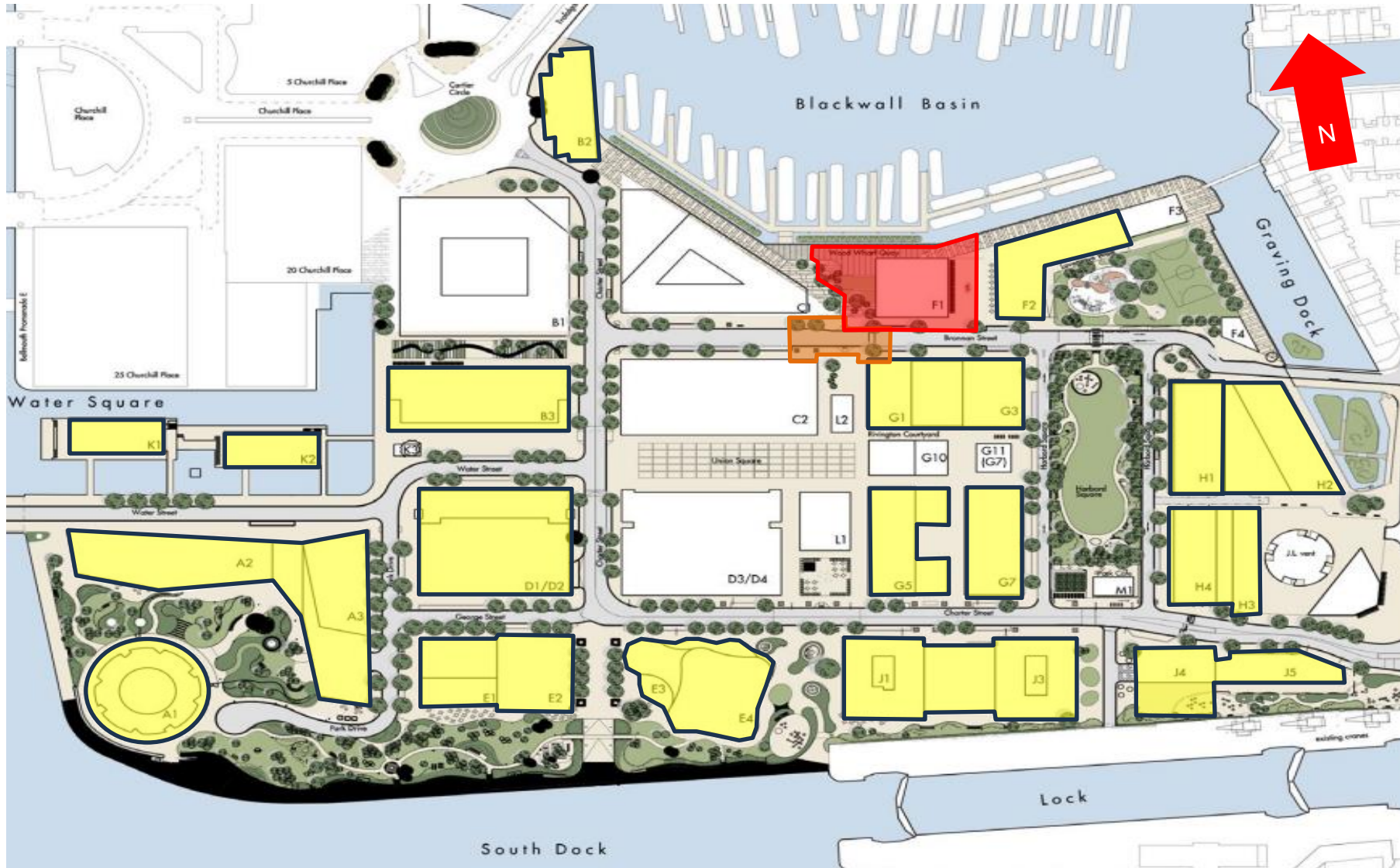




View of Proposal with cumulative schemes shown in orange outline from SE Corner of Poplar Dock



View of proposals from Millenium Dome Viewpoint



Wood Wharf Masterplan