

43 – 45 Gillender Street, London E14 6RN

Full planning and listed building consent for the demolition of an existing container building, the demolition of an existing extension to Bromley Hall (Grade II* Listed), the erection of two blocks between 3 and 5 storeys to provide 22 residential units and 587 sq.m. of office space (Use Class B1a), minor alterations to Old Poplar Library (Grade II Listed) and Bromley Hall (Grade II* Listed).

- **Planning and Impact Statement**

On behalf of: Poplar HARCA

July 2019

Leaside Planning Ltd.

Old Poplar Library
45 Gillender Street
London E14 6RN

Tel: 0207 517 7654

www.leasideplanning.co.uk

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01 | introduction

- 1.1 This Planning and Impact Statement has been prepared on behalf of Poplar HARCA (Applicant) in support of their application for full planning permission and listed building consent for the demolition of an existing container building, the demolition of an existing extension to Bromley Hall (Grade II* Listed), the erection of two blocks between 3 and 5 storeys to provide 22 residential units and 587 sq.m. office space (Use Class B1a), and minor alterations to Old Poplar Library (Grade II Listed) and Bromley Hall (Grade II* Listed) at 43-45 Gillender Street, London E14 6RN.
- 1.2 Figure 1 below shows in red the site boundary of the development and the Applicant's additional landownership identified by a blue line.



Figure 1: Site location plan

1.3 The documents supporting the planning application and listed building consent comprise:

- Planning Application Forms and Certificates;
- Planning and Impact Statement;
- CIL Form;
- The following supporting documents:

Design and Access Statement by StockWool Architects
Transport Assessment by EAS
Construction Logistics Plan by EAS
Draft Travel Plans by EAS
Servicing and Deliveries Plan by EAS
Healthy Streets Assessment by EAS
Energy Statement by Energy Council
Sustainability Statement by Energy Council
Foul and Surface Water Drainage Strategy by 7 Engineering Consultancy
Ecology Survey and Report by agb Environmental
Utilities Assessment by RPS
Heritage Assessment by Heritage & Urban Design
Historic Environmental Assessment by Museum of London Archaeology
Phase 1 Geoenvironmental Desk Study by agb Environmental
Noise Impact Assessment by Airo
Daylight, Sunlight and Overshadowing Assessment by XCO2
Air Quality Assessment by agb Environmental
Statement of Community Involvement by Leaside Planning Ltd
Landscape Statement by PRP
Viability Appraisal by Altair
Flood Risk Assessment by agb Environmental

- The following plans:

PL (20)001 Existing Location Plan
PL (20)002 Existing Site Plan
PL (20)003 Proposed Location Plan
PL (20)004 Proposed Site Plan
PL (20)100 Ground Floor Plan
PL (20)101 First Floor Plan
PL (20)102 Second Floor Plan
PL (20)103 Third Floor Plan
PL (20)104 Fourth Floor Plan
PL (20)105 Roof Plan
PL (20)200 West Elevation (open)
PL (20)201 West Elevation (closed)
PL (20)202 East Elevation
PL (20)203 North Elevation
PL (20)204 East Elevation
PL (20)205 South Elevation
PL (20)206 West Elevation
PL (20)207 Section A-A
PL (20)208 Section B-B

PL (20)209 Section C-C
PL (20)210 Section Detail Bromley Hall
PL (20)211 Section Detail Poplar Library
PL (20)212 Section Detail West Commercial
PL (20)213 Section Detail East Residential
PL (20)214 Section Detail West Residential
PL (20)301 Landscape Plan – Phase 01
PL (20)302 Landscape Plan – Phase 02
PL (20)400 GF Plan Existing
PL (20)401 1st Floor Plan Existing
PL (20)402 2nd Floor Plan Existing
PL (20)403 Roof Plan Existing
PL (20)404 Existing North Elevation
PL (20)405 Existing East Elevation
PL (20)406 Existing South Elevation
PL (20)407 Existing West Elevation A-A
PL (20)408 Existing West Elevation B-B

- 1.4 The overall site area within the ‘red line’ measures 0.22 hectares. Poplar HARCA is a Registered Social Housing Provider and the landowner of 43 – 45 Gillender Street, London E14 6RN.
- 1.5 The site includes two statutory listed buildings, Old Poplar Library, Grade II Listed, and Bromley Hall, Grade II* Listed. The site lies within the Limehouse Cut Conservation Area. A separate Heritage Assessment by Heritage & Urban Design is submitted. The site also lies within an Area of Archaeological Importance and a Historic Environmental Assessment by Museum of London Archaeology is included.
- 1.6 The site falls within the Ailsa Street Site Allocation (Site 11) as shown in the Tower Hamlets Adopted Policies Map 2013.
- 1.7 This Planning and Impact Statement demonstrates the high quality and sustainable credentials of the development which responds to the site’s context and the planning policy framework for the area. The document contains the following sections:
- Section 2 describes the **proposals**
 - Section 3 summarises the **key planning considerations**
 - Section 4 describes the **site and surroundings**
 - Section 5 provides the material **planning history** of the three sites.
 - Section 6 describes the **pre-application process**
 - Section 7 identifies the **planning policy framework**
 - Section 8 **assesses the application** against the planning policy framework
 - Section 9 reports specialist studies considering the **impact** of the scheme
 - Section 10 provides a **conclusion** on the planning merits of the development

02 | the proposal

- 2.1. The application is for full planning permission and listed building consent for the demolition and removal of 44 Gillender Street (the 3 - storey shipping container building also known as 'RedBox') and the demolition of the 60 sq.m. single storey extension to Bromley Hall, and the erection of two new blocks between 3 and 5 storeys.
- 2.2. The scheme will replace the office accommodation (Use Class B1(a)) in RedBox (639 sq.m. GIA) with a new three storey block located on the A12 Blackwall Tunnel Northern Approach Road between Bromley Hall (43 Gillender Street) and the Old Poplar Library (45 Gillender Street). This new block will provide 587 sq.m. GIA of office/workspace (Use Class B1(a)).
- 2.3. A separate block of three and five storeys will occupy the location of the RedBox building on the eastern side of the site and will provide 22 new dwellings comprising 11 x 1-bedroom, 7 x 2-bedroom, and 4 x 3-bedroom units.
- 2.4. The scheme will provide 35.6% affordable housing and is supported by a viability appraisal. The ratio between affordable rented and intermediate housing will be 57/43 with 4 social rented units and 3 intermediate units.
- 2.5. A detailed breakdown of the proposed residential accommodation is set out in Section 8 '*Planning considerations*' below.

03 | summary of key planning considerations

- 3.1 Poplar HARCA is a Housing and Regeneration Community Association established in the late 1990's with a focus on: "... *providing homes and support to residents old and new; helping to create a place where people, communities and businesses can grow and thrive.*"
- 3.2 In 2011 the Leaside Business Centre was transferred to Poplar HARCA by the Leaside Regeneration Limited Board. Since then, Poplar HARCA have continued to operate and manage it as a small business cluster. More recently, Poplar HARCA have completed their development of Poplar Works, a fashion business hub to the south of the site at Abbott Road. The proposals in this planning application will expand and complement Poplar Works and together they will reinforce the business cluster around Ailsa Street.
- 3.3 The application proposals will provide 22 additional dwellings, with over 35% of the habitable rooms being affordable, assisting the local authority meet its London Plan housing targets, including the provision of affordable homes, with appropriate design quality at a suitable residential density. As such, the application is in line with London Plan Policy 3.3 '*Increasing housing supply*' and Policy 3.4 '*Optimising housing potential.*' It also meets Tower Hamlets Core Strategy Policy SP02 '*Urban living for everyone*' and Policy DM3 '*Delivering homes*' of the Managing Development Document 2013; which seek the optimum intensity of use compatible with the local context.
- 3.4 The Leaside Business Centre falls within the 'Place' of Poplar Riverside identified in Annex 9: '*Delivering Placemaking*' of the Tower Hamlets Core Strategy 2010. The Vision for Poplar Riverside is that it will be comprehensively regenerated, changing it from a largely industrial area to a predominately residential area properly connected to the River Lea and across the A12 to surrounding areas. Overall, it will fully realise its potential as an attractive location for living, working and leisure.
- 3.5 The site forms part of the Council's Ailsa Street Site Allocation (Site 11) where it is proposed that there will be a comprehensive mixed-use scheme to provide a strategic housing development, a primary school and other compatible uses, including employment floorspace. The scheme achieves the stated development objectives and will protect, enhance and integrate heritage assets on site, address the noise and air pollution generated by the A12, and improve active site edges along the A12.
- 3.6 The scheme will introduce 587 sq.m. of modern office accommodation in the form of workspace designed to encourage small and medium sized businesses to locate within the local community. This fully aligns with the Council's policy of supporting the growth of existing and future businesses through Policy SO16 '*Enabling Prosperous Communities*' of the Core Strategy, and Policy DM15 '*Local job creation and investment*' of the Development Management Plan.

- 3.7 The scheme proposals will achieve a high-quality design that will complement the Listed buildings, helping to maintain them for future generations, while enhancing the Limehouse Cut Conservation Area.
- 3.8 The proposal has been designed to respond sensitively to the sites context and constraints and will not create unacceptable impacts on its surroundings or social and physical infrastructure. The scheme proposal will improve the appearance and functioning of the site and not encroach on any sensitive views. In this respect, the proposal meets Tower Hamlets Core Strategy Policy SP12 '*Delivering placemaking*' that seeks to ensure that places are well designed and respect features that contribute to its heritage, character and local distinctiveness.
- 3.9 All the proposed residential units are designed to achieve good standards of accommodation and amenity. All the dwellings will meet the Technical housing standards – nationally described space standard, the London Plan Table 3.3 '*Minimum space standards for new dwellings*' and the design standards of the Mayor's '*Housing*' SPG 2016. Ten percent of the new housing (two units) will be easily adaptable for wheelchair users meeting London Plan Policy 7.2 '*An inclusive environment*', the Mayor's SPG and will comply with Building Regulations Part M.
- 3.10 The scheme does not present significant negative impacts on the amenity of neighbours from overlooking, outlook, loss of light, overshadowing or loss of privacy. Each of these issues has been tested through a series of studies and the results show the scheme to be acceptable in terms of BRE guidance and the urban context. In these respects, the application complies with the Tower Hamlets Core Strategy Policy SP02 '*Urban living for everyone*' which seeks to protect the amenity of residential occupiers and the environment in general.
- 3.11 The submitted Energy Statement by Energy Council demonstrates that each individual element within the scheme will comply with the Mayor's Energy Hierarchy. Overall, the development will be sustainable and compliant with London Plan 2016 Policy 5.2 '*Minimising carbon dioxide emissions,*' the Mayor's '*Sustainable design and construction*' SPG, Tower Hamlets Core Strategy Policy SP11 '*Working towards a zero-carbon borough*' and Managing Development Document Policy DM29 '*Achieving a zero-carbon borough and addressing climate change.*'
- 3.12 The scheme will meet London Plan standards for cycle parking and accord with Tower Hamlets Core Strategy Policy SP09 '*Creating attractive and safe streets and spaces.*'
- 3.13 Poplar HARCA is prepared to execute a '*car free*' obligation with the local authority preventing residents (except for registered Blue Badge holders and those that qualify under the Tower Hamlets Permit Transfer Scheme) from purchasing on-street parking permits from the Council.

04 | site and surroundings

- 4.1 The application site contains an area of 0.22 hectares and is located on the east side of the A12 Blackwall Tunnel Northern Approach Road; approximately 1km north of the entrance to the tunnel. The site includes the following three buildings:
- Bromley Hall (43 Gillender Street) a two-storey historic dwelling (Grade II* Listed) with a floor area of 320 sq.m. (GIA). The building is in the north-western corner of the site, adjacent to the A12 Road at its junction with Gillender Street. The building was refurbished and converted in 2006 to provide 13 small office units and is let out for business use (Use Class B1a).
 - RedBox (44 Gillender Street) a three-storey temporary building constructed from recycled shipping containers. The building was completed in 2004 and is in the north-eastern corner of the site. It has a floor area of 639 sq.m. (GIA) and contains 20 serviced office units for small businesses (Use Class B1a).
 - Old Poplar Library (45 Gillender Street) a three-storey former library (Grade II Listed) with a floor area of 530 sq.m. (GIA). The building is located on the south-western boundary of the site adjacent to the A12 Road. Its use as a library ceased on the 29th August 1991 and it was refurbished and converted in 2002 to 11 serviced office units for small businesses (Use Class B1a).
- 4.2 A detailed description and history of the above-mentioned listed buildings is included within the Heritage Assessment.
- 4.3 Vehicular and pedestrian access into the site can be gained off the A12 via a set of security gates; beyond which is a part tarmac/concrete and gravel surfaced car park with space for 22 cars. Access into the site can also be gained via the main entrance to the Old Library.
- 4.4 Adjacent to the north and north-east of the site, beyond a 2-metre-high brick boundary wall, is a lorry parking area. Beyond this, some 50 meters from the site boundary is Bow Creek - a tidal stretch of river joining with the River Thames in the south. Beyond the eastern boundary is the Ailsa Wharf development site with permission for a mixed-use scheme to provide 785 dwellings and approximately 3,000 sq.m. of commercial floorspace in buildings from 3 and 17 storeys.
- 4.5 On the southern boundary, with a frontage onto the A12 road is a 6-storey and a 3-storey mixed residential block with ground floor shop unit completed around 2008. Adjoining this site to the south is a small car breakers yard. To the west of the application site, on the opposite side of the A12 road and set behind a 3-metre high brick retaining wall and row of domestic garages, is the Teviot residential estate comprising predominately 3/4-storey brick-built blocks of flats and maisonettes constructed in the 1970's.

- 4.6 The whole of the application site is located within the Limehouse Cut Conservation Area. It is also within the Environment Agencies Flood Zone 3a (defined as having a high probability of flooding). The application includes a Flood Risk Assessment and further information and assessment is provided in Section 9 '*Impact*' below.
- 4.7 The nearest London Underground Station is Bromley-by-Bow, which is located approximately 630m to the north of the site. This is served by the District and Hammersmith & City Lines. Langdon Park DLR Station is located approximately 650m to the west of the site. This provides access to services to Stratford and Canary Wharf. The nearest bus stops are on the A12 road and are approximately 100m to the south and west of the site.
- 4.8 The sites Public Transport Accessibility Level (PTAL) has been calculated as 4 'Good'. Further information is provided in the Transport Assessment and in Section 8 '*Planning considerations*' below.
- 4.9 The site contains no trees and only limited shrub planting, most of the area is given over to hard standing and the site is unlikely to be of ecological interest. This is confirmed in the Ecology Survey and Report submitted with the application.
- 4.10 Images of each of the buildings is contained within the Design and Access Statement and the Heritage Assessment and details of the adjoining development site is provided within the Design and Access Statement by StockWool Architects.

Background, ownership and management of the site

- 4.11 Until 2011 the site was owned and managed on a day-to-day basis by Leaside Regeneration Limited, a not-for-profit organisation established in partnership with the London Borough of Tower Hamlets to steer the social, economic and physical regeneration of the east of the Borough.
- 4.12 Bromley Hall was purchased by Leaside Regeneration in 2001 who then completed a £1.1m restoration project to bring the building back into use as serviced office units for small businesses.
- 4.13 Old Poplar Library was purchased by Leaside Regeneration from the Borough and refurbished to provide a 'Seedbed Business Centre', the first part of an overall regeneration programme in the Leaside area. The project was completed in 2002.
- 4.14 In 2011, the Leaside Regeneration Limited Board stood down and the Leaside Business Centre was transferred to Poplar HARCA - who continue to operate and manage it as a small business cluster. More recently, Poplar HARCA have completed their development of Poplar Works, a fashion business hub to the south of the site at Abbott Road. This scheme will provide a total floorspace 2,136 sq.m. of new business space, garment production space and training space. The proposals in this planning application will expand and complement Poplar Works and together they will reinforce the business cluster around Ailsa Street.

05 | material planning history

- 5.1 The site has been the subject of the following planning permissions in recent years, these being:

Bromley Hall, 43 Gillender Street

PA/02/00729 – 43 Gillender Street, London, E14 6RN

Demolition of southern side extension to Bromley Hall and demolition of rear factory.
Permitted 01/08/2002

PA/02/00992 – 43 Gillender Street, London, E14 6RN

Erection of three-storey ship containers and connecting towers in connection with their use as 12 office units (Class B1) and 24 parking spaces for a temporary period of 5 years.

Permitted 20/11/2002

PA/02/00993 – 43 Gillender Street, London, E14 6RN

Erection of three-storey ship containers and connecting towers in connection with their use as 12 office units (Class B1) and 24 parking spaces at the rear of a listed building for a temporary period of 5 years.

Permitted 20/11/2002 Listed Building Consent

PA/03/01655 – 43 Gillender Street, London, E14 6RN

Restoration and conversion of Bromley Hall to a business centre.
Permitted 26/02/2004

PA/03/01656 – 43 Gillender Street, London, E14 6RN

Restoration and conversion of Bromley Hall to a business centre.
Permitted 26/02/2004 Listed Building Consent

PA/06/00198 – 43 Gillender Street, London, E14 6RN

Amendment to Condition One of Listed Building Consent PA/02/993 (Erection of three-storey ship containers and connecting towers in connection with their use as 12 office units (Class B1) and 24 parking spaces for a temporary period of 5 years) to extend temporary planning consent for a further 5 years until 12 November 2012.
Permitted 07/08/2006 Listed Building Consent

PA/06/00200 – 43 Gillender Street, London, E14 6RN

The erection of two additional storeys to an existing three storey temporary office space to provide eight new office units and the provision of two external lifts.
Permitted 07/08/2006 Listed Building Consent

PA/06/00197 – 43 Gillender Street, London, E14 6RN

Amendment to Condition One of planning reference PA/02/992 (Erection of three-storey ship containers and connecting towers in connection with their use as 12 office units (Class B1) and 24 parking spaces for a temporary period of 5 years) to

extend temporary planning consent for a further 5 years until 12 November 2012.
Permitted 09/02/2007

PA/06/00199 – 43 Gillender Street, London, E14 6RN
The erection of two additional storeys to an existing three storey temporary office space to provide eight new office units and the provision of two external lifts.
Permitted 09/02/2007

Old Poplar Library, 45 Gillender Street

PA/86/00775 – Former Bromley Library, 45 Gillender Street, London, E14 6RN
Change of the use of first floor and part ground floor to Community Centre including provision of new pedestrian entrance and alterations to internal partitions.
Permitted 04/03/1987

PA/86/00871 – Former Bromley Library, 45 Gillender Street, London, E14 6RN
Change of use of first floor and part ground floor to community centre including provision of new pedestrian entrance.
Permitted 10/05/1987

PA/99/01356 – 45 Gillender Street, London, E14 6RN
Change of use of library to a business centre and use of land in Bromley Hall Road as an associated car park.
Permitted 13/11/1999

PA/00/00002/A1 – 45 Gillender Street, London, E14 6RN
Change of use and alterations to the Grade II listed library to form a business centre; the erection of a new two storey building to the rear comprising 6 No. Live/Work units together with use of site in Bromley Hall Road as ancillary car parking for 10 cars and 8 bicycles.
Permitted 14/09/2000

PA/00/00003 – 45 Gillender Street, London, E14 6RN
Listed building consent for alterations and restoration in connection with formation of a business centre.
Permitted 14/09/2000 Listed Building Consent

06 | pre-application process

- 6.1. Revised NPPF Chapter 4 address 'Decision-making' and paragraphs 39-41 (and paragraph 128) emphasise the value of pre-application engagement between applicants, LPA's and the local community.
- 6.2. The proposals in this application have evolved through a programme of three pre-application meetings held on 9th February 2018, 30th October 2018 and 3rd April 2019 with the Council's Directorate of Place and the Council's Highways Officers (PF/17/00271).
- 6.3. A full account of the comments received from these pre-application meetings, together with the Applicant's response is set out in Sections 4, 5 and 6 of the Design and Access Statement. While the Council's formal response for the third pre-application meeting have not been received at the time of submission, the key points raised included:

Comment: The removal of the 1920's side extension to Bromley Hall is agreed, as is the height, layout, and massing of all the proposed buildings.

Comment: It is recommended that the proposed canopy on the new building facing the A12 be either reduced or removed, whilst recognising that the visual prominence of the main entrance needs to be highlighted.

Response:

The canopy has been reduced in scale and re-designed to better fit with the scheme frontage.

Comment: Defensible space needs to be introduced for the ground floor residential units facing into the courtyard.

Response: Hedge planting has been introduced along the residential frontages facing onto the courtyard. This is detailed in the Landscape Proposals.

Comment: The presentation images of the completed scheme should show the necessary street furniture on the A12 frontage.

Response: The street furniture proposed along the A12 frontage is now included within the scheme illustrations.

Comment: There should be a review of the access, servicing and parking arrangements proposed off the A12 with an emphasis on a betterment for pedestrians along this route.

Response: The access, servicing and delivery arrangements have been revised in consultation with Transport for London. The layby has now been moved onto the A12 roadside. This allows the footpath to be widened and the pedestrian environment to be enhanced. Full details of the proposals are contained in the Transport Assessment and Servicing and Deliveries Plan as well as the Design and Access Statement and Landscape Proposals.

Comment: There should be an illustrative design showing a potential future access option taken from the rear of the site (east). This will potentially include introducing two disabled parking bays within the site boundary. It was suggested that the Planning Case Officer assist by raising the matter of a right of access with Country Garden who are the developers of the Ailsa Wharf site to the east. It was agreed that the access arrangements will be a two-stage process with the A12 being used until the site to the east is potentially introduced, but that this would not prevent or delay the implementation of the current scheme.

Response: *The Design and Access Statement and Transport Statement provide an illustrative scheme whereby, upon completion of the Ailsa Wharf development to the east by Country Garden, access may be gained to the site for deliveries and servicing from a new estate road at the rear of the site and where two disabled parking bays can be introduced. The Applicant is currently in discussion with Country Garden with the intention of facilitating this. However, until this is concluded, site servicing and delivery drop-off will be restricted to the west of the site on the A12 Road.*

6.4. In addition to pre-application meetings with the Local Planning Authority, the Applicant has consulted with Historic England in meetings held with them on the 6th December 2017 and the 27th November 2018. Historic England also attended the planning pre-application meeting on the 3rd April 2019.

6.5. The main issues arising were identified as:

Scale, height, massing and form: "We are particularly pleased to see that the commercial block along the A12 has been reduced by a storey to bring it in line with the height of the Grade II listed library whilst also responding to the floor levels of the Grade II* listed Bromley Hall. The commercial block's northernmost bay would no longer be physically connected to the pre-20th century parts of Bromley Hall, and would sit below its eaves height and behind the front chimney stack as we previously advised."

Relationship of new build to Bromley Hall: "Whilst these changes are welcomed, we maintain the view that the extension above the 1920s wing of Bromley Hall is architecturally unresolved. We suggest that a different architectural approach is taken for the northernmost bay to break down the mass of the commercial block, to reduce the sense of encroachment on Bromley Hall, and to retain a sense of architectural integrity to the 1920s wing."

Response: Since this comment, and with the advice of Historic England, the relationship between the proposed new block and Bromley Hall has been redesigned. It is now proposed to remove the existing more recent extension to Bromley Hall and to replace this with a light-weight, glazed, double height reception building.

Materials: "Regarding the design of the commercial block, we understand that the proposed louvre/fin treatment to the facade is proposed to provide a visual and sound buffer to the A12. However, we suggest that alternative treatments are explored that would better respond to the character of the Limehouse Cut Conservation Area."

Response: A more proportionate use of the fins has now been introduced. It is considered, and in response from the Council's design officer, that this more 'subdued' design is appropriate within this setting.

Residential design: *"The design and materiality of the proposed residential blocks to the rear respond much more successfully to the industrial warehouse character of the conservation area in our opinion. On the basis of the visual information available, their medium-scale would not overwhelm the more modest scale of Bromley Hall, and their arrangement would help to provide a tranquil courtyard setting for the listed building. The removal of vehicular access to the site should further improve the courtyard environment. We continue to recommend that the landscaping for the courtyard area draws influence from the research undertaken by your heritage specialist in the interest of revealing and enhancing the historic environment as is supported in national planning policy and legislation."*

Response: As advised, the layout and design of the courtyard gardens have been designed with reference to the history of the site, and with the input of the Applicant's heritage specialist. Details are provided within the Landscape Proposals.

07 | planning policy framework

Overview

- 7.1 This section sets out the key, regional and local planning policies and guidance within the revised NPPF that have guided the evolution of the development.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan for the area unless material considerations indicate otherwise.
- 7.3 For the purposes of Section 38(6) of the Planning and Compulsory Act 2011, the development plan for the London Borough of Tower Hamlets comprises:

The Development Plan

- The London Plan March 2016
- Tower Hamlets Core Strategy 2010
- Tower Hamlets Managing Development Document 2013
- Tower Hamlets Adopted Policies Map

Other material considerations

- Homes for Londoners – Affordable Homes Programme 2016-21 Funding Guidance
- Technical housing standards – nationally described space standard 2015
- The Mayor's 'Housing' SPG 2016 (Mayor of London)
- Homes for London - The London Housing Strategy. June 2014 (Mayor of London)
- Shaping Neighbourhoods Character and Context - June 2014 (Mayor of London)
- London Planning Statement SPG - May 2014 (Mayor of London)
- Sustainable Design and Construction SPG - April 2014. (Mayor of London)
- Energy Planning - Guidance on preparing energy assessments March 2016 (Mayor of London)
- Shaping Neighbourhoods: Play and Informal Recreation SPG - September 2012 (Mayor of London)
- Wheelchair accessible housing Best Practice Guidance 2007 (Mayor of London)
- Tower Hamlets Air Quality Action Plan 2003
- Planning Obligations SPD - 2016 (Tower Hamlets Council)
- Site Layout Planning for Daylight and Sunlight – A guide to good practice (Building Research Establishment Trust 2011)

Regional planning policy

The London Plan 2016

- 7.4 The London Plan provides the spatial development strategy for Greater London. In the context of the proposal, the Plan states that the strategic policy for inner London is to:

"...realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new

communities, addressing its unique concentrations of deprivation, and improving quality of life and health for those living, working, studying or visiting there." (Policy 2.9 – Inner London)

- 7.5 Policy 2.14 and Map 2.5 of the Plan identify the application site as lying within an Area for Regeneration. The policy states:

"Within the areas for regeneration shown on Map 2.5 the Mayor will work with strategic and local partners to co-ordinate their sustained renewal by prioritising them for neighbourhood-based action and investment." (Policy 2.14 - Areas for Regeneration, Part A)

- 7.6 Policy 4.1 'Developing London's Economy' states that the Mayor will work with partners to:

"Promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises..." (Part A – a1)

- 7.7 Specifically, regarding offices, Policy 4.2 notes that the Boroughs should:

"support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises."

- 7.8 Policy 7.9 'Heritage-Led Regeneration' states that

"Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm."

- 7.9 As noted above, the accompanying Heritage Assessment sets out the schemes response to specific heritage and conservation policies.

Tower Hamlets Local Plan

Adopted Policies Map 2013

- 7.10 The site lies within Site Allocation 11 - Ailsa Street where it is proposed that there will be a comprehensive mixed-use scheme to provide a strategic housing development, a primary school and other compatible uses, including employment floorspace.
- 7.11 The relevant section of the Adopted Policies Map is reproduced in Figure 2 below.
- 7.12 The key design principles relevant to the Ailsa Street site include:
- *"Development should respect and be informed by the existing character, scale, height, massing and urban grain of the surrounding built and natural environment."*

- *Development should protect, enhance and integrate heritage assets on site, including Poplar Public Library and Bromley Hall, and in the surrounding areas within the borough and the London Borough of Newham.*
- *Address the noise and air pollution generated by the A12.*
- *The public realm should be improved at active site edges, specifically along the A12 and Leven Road."*



Figure 2 - Site Allocation 11, Ailsa Street, Policies Map 2013

Tower Hamlets Core Strategy 2025 - September 2010

7.13

The Core Strategy provides the spatial vision for the borough until 2025. Chapter 7 'Delivering Placemaking' seeks to deliver successful placemaking in Tower Hamlets to create locally distinctive, well designed, healthy and great places which interconnect with, respond and integrate into the wider London area. Figure 39 'Strategic visions for places' identifies 24 'places' within Tower Hamlets and applicable to the application site is the area defined as 'Poplar Riverside' in LAPs 7 & 8. Within Annex 9: 'Delivering placemaking' identifies the Vision for Poplar Riverside as changing from a largely industrial area to a predominately residential area, characterised by its reconnection to the River Lea and connections across the A12 and to surrounding areas. Overall, it will fully realise its potential as an attractive location for living, working and leisure.

- 7.14 The intention is that growth and regeneration will bring about improvements needed in order to integrate the area with its surroundings both in Tower Hamlets and across the River Lea to Newham.
- 7.15 The Plan notes that new buildings located adjacent to the A12 should be designed to address and present a positive edge and buffer to mitigate noise and air pollution from the A12.
- 7.16 The Poplar Riverside vision diagram is reproduced in Figure 3 below.



Figure 3 – Poplar Riverside vision diagram, Tower Hamlets Core Strategy 2010

- Tower Hamlets Managing Development Document - 2013 (MDD)
- 7.17 The MDD provides the planning policies and site allocations to implement the Core Strategy and to get the best from development proposals. Applicable MDD policies have been used to develop the application proposal and are addressed in the relevant sections below.
- London Borough of Tower Hamlets 2016-2021 Housing Strategy
- 7.18 The latest Tower Hamlets Housing Strategy was adopted on 5th December 2016. The message from the Mayor (Introduction page 3) is:

- *Housing is the biggest issue facing Tower Hamlets residents.*
- *The shortage of affordable housing has led to high numbers of homeless families and thousands of families still overcrowded.*
- *As Mayor, I pledged to build 1,000 new council homes, and to look at helping residents who are being priced out of renting or buying in their local area. I also want to work with housing associations to ensure they are financially sustainable and properly accountable to their residents.*

7.19 Housing Strategy Delivery Theme 4 concerns – ‘Effective partnership working with residents and stakeholders.’ Paragraph 7.2 page advises:

- *The council works in partnership with around 50 housing associations in the borough,*
- *Some of these housing associations – **Poplar Harca**, EastendHomes and Tower Hamlets Community Housing – were set up by the council to deliver decent homes, improvements, new homes and broader regeneration outcomes which they have been undertaking,*
- *The large majority of new affordable housing for rent will be delivered by housing association partners,*
- *The council is keen to support the work and independence of borough-focused registered providers and are prepared to work with them to assess how their investment capacity can be maximised to meet the major development and regeneration opportunities that remain in the borough.*

7.20 Housing Strategy Action 27 is to develop more effective working with registered providers operating in the borough delivering local priorities remain local, independent and accountable to residents.

7.21 Action 33 is Working with the Mayor of London and the Greater London Authority. The Council and Greater London Authority (GLA) will continue to work in partnership to realise the Mayor of London and Tower Hamlets’ shared housing objectives.

National Planning Policy Framework (NPPF) February 2019

7.22 Local planning authorities must have regard to the revised NPPF that sets out the Government’s national objectives for planning and development management and the web-based Planning Practice Guidance (PPG).

7.23 NPPF paragraph 2 confirms that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

7.24 NPPF paragraph 7 confirms that the purpose of planning is to contribute to sustainable development. Sustainable means “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

7.25 NPPF paragraph 8 says achieving sustainable development involves achieving economic, social and environmental roles. The proposed development meets all three roles:

- An economic role – the construction of the proposed new housing and offices will contribute to a strong, responsive and competitive economy;
- A social role – additional housing and business accommodation will help support a strong, vibrant and healthy community;
- An environmental role – the scheme will contribute to protecting and enhancing the built and historic environment and support the long-term productive use of two important listed buildings.

7.26 NPPF paragraphs 189-192 set out the approach local planning authorities should take when determining whether to grant planning permission or other consents for a proposal that affects the significance of a heritage asset. A detailed policy context and full appraisal of the scheme in relation to heritage assets and conservation is set out in the Heritage Assessment submitted with this application.

Emerging planning policy

The Draft London Plan August 2018

7.27 The Mayor's new draft Spatial Development Strategy for Greater London was published for public consultation in December 2017. On 13th August 2018 the Mayor published a version of the draft Plan that includes his minor suggested changes. These suggested changes have been prepared following a review of consultation responses, and consist of clarifications, corrections and factual updates to the draft Plan that will help inform the Examination in Public (EiP). The EiP commenced on 15th January 2019 and the final session was held on 22nd May 2019. The Plan, while a material consideration, carries limited weight at present.

Tower Hamlets Draft Local Plan 2031

7.28 Our Borough, Our Plan – A new Local Plan First Steps December 2015 stated:

"Tower Hamlets is expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025. The borough's ability to supply land for housing in these quantities is becoming increasingly limited as a significant proportion of our available sites have already been developed."

7.29 On 28th February 2018, the Tower Hamlets Local Plan 2031 Regulation 19 consultation October 2017 was submitted to the Secretary of State for examination in public (EiP). The EiP has been held and the government-appointed inspector has proposed modifications to the Plan. Public consultation on the main modifications closed on the 9th May 2019.

7.30 Policy S.H1: 'Meeting housing needs' aims to secure the delivery of at least 58,965 new homes across the borough (equating to at least 3,931 new homes per year) between 2016 and 2031. Paragraph 4.14 says that a small proportion of overall housing needs will be delivered through infill development. This is precisely as proposed by the Applicant through the development at 43-45 Gillender Street.

08 | planning considerations

Introduction

- 8.1 This section assesses the proposals against the adopted and emerging development plan, the revised NPPF and supplementary guidance.
- 8.2 A detailed assessment of the development is made under the following topics:
- Provision of new housing
 - Affordable housing
 - Optimising housing potential
 - Housing quality
 - Child play space and communal open space
 - Office development
 - Urban design and heritage
 - Transport
 - Refuse and recyclables
 - Access and social inclusion
- 8.3 The format identifies the relevant policy in the development plan together with supplementary planning guidance and the NPPF. It highlights key considerations and then assesses the development against statutory policy, the Government's Framework and supplementary guidance.

Provision of new housing

Policy context

Regional

London Planning Statement SPG (May 2014)

- 8.4 Chapter 5 of this SPG provides the Mayor's Priorities for the London Planning System. The key challenge is planning for London's sustainable growth. The latest Greater London Authority projections suggest: Stronger population growth with a total population of 10.11 million in 2036 as opposed to 8.82 million anticipated in the 2011 Plan. On this basis, London will exceed its previous peak population of 8.6 million by 2019, rather than 2026 (Paragraph 5.1). This means:

"Ensuring delivery of enough good quality homes for a growing and ever more diverse population. Wherever possible, the housing benchmarks and targets in the London Plan should be exceeded. The London planning system should seek to deliver a range of homes, including affordable homes, meeting the range of housing needs across London. This will particularly require approaches that maximise the return to public resources in accordance with the policies in the London Plan." (Paragraph 5.2)

The London Plan 2016

- 8.5 Map 1.1 'Distribution of population growth 2011 – 2036 (% growth)' indicates that Tower Hamlets will be one of four London boroughs that experience the highest population growth of between 30% to 41.5% between years 2011– 2036.

- 8.6 The London Plan highlights the need to plan for continued growth. This means planning for:

"Substantial population growth, at least in the short to medium term, ensuring London has the homes, jobs, services, infrastructure and opportunities a growing and ever more diverse population requires. Doing this in ways that do not worsen quality of life for London means we will have to ensure we make the best use of land that is currently vacant or under-used, particularly in east London where the greatest potential exists." (Page 29)

- 8.7 The Mayor's first objective is to ensure London is:

***"A city that meets the challenges of economic and population growth** in ways that ensure a sustainable, good and improving quality of life and sufficient high-quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes."* (Page 31)

- 8.8 To promote opportunity and real choice for all Londoners, the Mayor is clear that London desperately needs more homes with a range of tenures that meets their diverse and changing needs and at prices they can afford. To achieve these aims, he is committed to taking effective steps to encourage the provision of new homes through the policies in the London Plan (Page 93).

- 8.9 The London Plan sets an annual average of 42,000 new homes across London (Policy 3.3 'Increasing housing supply'). A minimum ten-year target for Tower Hamlets of

39,314 for the period 2015 to 2025 is set and an annual monitoring target of 3,931 is also given (Table 3.1). Boroughs should seek to achieve and exceed their minimum targets.

Local

The Tower Hamlets Local Plan

- 8.10 Core Strategy Policy SP02 '*Urban living for everyone*' seeks to deliver 2,885 new homes per year between 2010 to 2025. This figure is no longer in line with the London Plan's housing targets which set an annual monitoring target for the borough of 3,931. Most of the new housing is to be focussed in the eastern part of the borough where the application site is located.
- 8.11 Chapter 4 of the Tower Hamlets Core Strategy 2010 addresses '*Strengthening neighbourhood well-being*'. Figure 24 identifies Bromley-by-Bow LAPs 5 & 6 for '*Medium Growth*' of between 1,501 – 2,500 new housing units over the plan period.

NPPF

- 8.12 Revised NPPF Chapter 5 concerns '*Delivering a sufficient supply of homes*'. Paragraph 59 says that: "... to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed."
- 8.13 The site comprises '*brownfield land*' where residential development is particularly encouraged. (NPPF paragraph 118 c)

Assessment

- 8.14 The redevelopment of a surface car park and removal of a modular temporary office building to provide 22 new residential units is strongly supported in the London Plan and will help the borough meet its London Plan housing targets.
- 8.15 The proposals also accord with Tower Hamlets Core Strategy 2010. The Core Strategy Programme of Delivery Appendix 2 identifies 15,230 new homes being required in LAPS 7 & 8 in years 2015 – 2025 with 950 new homes required in Poplar Riverside during the same period. Poplar Riverside is identified for '*High growth*' between 2015 and 2020.
- 8.16 The application site forms part of the Ailsa Street site and is included in the '*Site Allocations*' identified in the Adopted Policies Map and in Section 3 of the Managing Development Document. A scheme in this location will be expected to provide a strategic housing development, a primary school and other compatible uses, including employment floorspace.
- 8.17 In land use terms, the proposal will achieve sustainable development on '*brownfield*' previously developed land with a significant amount of new residential accommodation. This is supported by policy objectives at national, regional and local levels.

Affordable housing and dwelling mix

Policy context

Regional

The London Plan 2016

- 8.18 Policy 3.8 'Housing choice' requires new development to offer a range of housing choices in terms of mix, size and types. The provision of affordable family housing is emphasised as a strategic priority.
- 8.19 In promoting mixed and balanced communities (Policy 3.9), the Mayor notes that in providing these new homes:
- "Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment."*
- "A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation."** (Policy 3.9)
- 8.20 Policy 3.10 'Definition of affordable housing' includes housing for rent or sale below market levels i.e. intermediate shared ownership and the supporting text states that:
- "Increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded."* (paragraph 3.62)
- 8.21 Rather than setting an overall percentage target for new affordable homes, Policy 3.11 'Affordable housing targets' emphasises the need to maximise affordable provision and ensure that London delivers an average of at least 17,000 per annum. The actual affordable housing targets for individual boroughs may be expressed in absolute or percentage terms based on an assessment of local need, capacity and deliverability.
- 8.22 The Mayor proposes (paragraph 3.66) that as a long-term strategic target 60% of new affordable housing should be for social/affordable renting, especially for families, and that 40% should be for the range of intermediate housing products outlined in the London Housing Strategy to meet different needs,
- 8.23 Policy 3.12 'Negotiating affordable housing on individual private residential and mixed-use schemes' provides that the maximum reasonable amount of affordable housing should be sought having regard to:
- the need to encourage rather than restrain residential development,
 - the need to promote mixed and balanced communities,
 - the specific circumstances of individual sites,
 - resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor,
 - the priority to be accorded to provision of affordable family housing,
 - current and future requirements for affordable housing at local and regional levels,

- *affordable housing targets,*
- *the size and type of affordable housing needed in particular locations.*

Homes for Londoners Affordable Housing and Viability SPG (Mayor of London 2017)

- 8.24 This SPG provides a framework for delivering the maximum reasonable amount of affordable housing in the context of current London Plan Policies (3.10, 3.11, and 3.12). The SPG introduced a '*threshold approach*', whereby schemes meeting or exceeding 35 per cent affordable housing without public subsidy (or 50 per cent where on public land, without grant) can follow a '*Fast Track Route*'. Where the scheme does not exceed the threshold [or requires a public subsidy to do so] or involves the demolition of existing affordable housing then the '*viability tested route*' should be taken. This involves the applicant submitting detailed viability information.
- 8.25 All schemes are expected to determine whether grant and other forms of subsidy are available and to make the most efficient use of this to increase the level of affordable housing delivered. All applicants are expected to work with the LPA, the Mayor, and Registered Providers (RPs) to ensure affordable housing from all sources is maximised.
- 8.26 The scheme provides 35.6% affordable housing. As such, a viability appraisal is submitted with this application.

Local

The Tower Hamlets Local Plan

- 8.27 Core Strategy Policy SP02 '*Urban Living for everyone*' and Managing Development DPD Policy DM3 '*Delivering homes*' provide the Council's strategic target to achieve 35% to 50% affordable homes subject to viability in a ratio of 70:30 between affordable rented and intermediate housing. The policy also seeks an overall target that 30% of all new housing is for families (3 bed+) including 45% family homes in the affordable rented sector.
- 8.28 Managing Development DPD Policy DM3 sub-policy 3 requires development to maximise the delivery of affordable housing on-site.
- 8.29 Managing Development DPD Policy DM3 sub-policy 7 requires development to provide a balance of housing types including family homes in accordance with the following breakdown of unit type set out in Figure 4 below.

Tenure	1-bed %	2-bed %	3-bed %	4-Bed %
Market	50	30	20	
Intermediate	25	50	25	0
Affordable Rented	30	25	30	15

Figure 4 - Managing Development DPD Policy DM3 sub policy 7. Dwelling mix by tenure

NPPF

- 8.30 Revised NPPF paragraph 62 requires that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site. Where major development involving the provision of

housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership (paragraph 64).

Assessment

Affordable housing contribution

- 8.31 The scheme will provide a total of 22 residential units (59 habitable rooms) with 35.6% affordable housing comprising 4 affordable rental units (12 habitable rooms) and 3 intermediate tenure (9 habitable rooms). The mix is set out in Figure 5 below.

Figure 5 - Proposed Accommodation Mix & Tenure Split

Ownership	Type	Units	Hab rooms	%age		
Private	Studio	0	0	0.0		
	1 bed	8	16	53.3		
	2 bed	6	18	40.0		
	3 bed	1	4	6.7	Family Units	6.7%
	4 bed	0	0	0.0		
	5 bed	0	0	0.0		
Total new sale		15	38	100.0	64.4%	
Affordable/Social Rented	studio	0	0	0.0		
	1 bed	2	4	50.0		
	2 bed	0	0	0.0		
	3 bed	2	8	50.0	Family Units	50.0%
	4 bed	0	0	0.0		
	5 bed	0	0	0.0		
	6 bed	0	0	0.0		
Total affordable rent		4	12	57.1%		
Intermediate	Studio	0	0	0.0		
	1 bed	1	2	33.3		
	2 bed	1	3	33.3		
	3 bed	1	4	33.3	Family Units	33.3%
	4 bed	0	0	0.0		
	5 bed	0	0	0.0		
total intermediate		3	9	42.9%		
Total new affordable		7	21		35.6%	
Total new build		22	59			

Affordable rent / Intermediate ratio

- 8.32 The scheme will provide an affordable rent/intermediate ratio of 57/43 on a unit basis. While this favours intermediate units and exceeds to Councils policy in this respect (70/30), it does align more closely to the Mayor's guidance of 60/40. The level of affordable rent has also to be seen in the context of the viability appraisal for the scheme which shows that affordable rented units have been maximised (see Section 9 – Impact).

- 8.33 Poplar HARCA is a registered provider of social housing with the expressed aim of providing affordable homes to households on low incomes including the provision of services and support for local residents and small businesses.

Dwelling Mix

- 8.34 London Plan Policy 3.8 requires development to offer a range of housing choices. Core Strategy Policy SP02 and Managing Development DPD Policy DM3 require development to provide a balance of housing types in accordance with the specified break down of unit types. These figures and the breakdown of the proposed accommodation are shown in Figure 6 below.

Figure 6 - Proposed housing mix and Local Plan policy

		Affordable Housing						Market Housing		
		Affordable Rented			Intermediate			Private Sale		
Unit size	Total units	Units	%	Target %	Units	%	Target %	Units	%	Target %
Studio	0	0	0	0	0	0	0	0	0	0
1 bed	11	2	50	30	1	33.3	25	8	53.3	50
2 bed	7	0	0	25	1	33.3	50	6	40	30
3 bed	4	2	50	30	1	33.3	25	1	6.7	20
4 bed	0	0	0	15	0	0	0	0		
5 bed	0	0	0		0			0		
6 bed	0	0	0		0			0		
Total	22	4	100	100	3	100	100	15	100	100

- 8.35 The London Plan supports the provision of affordable family housing. Policy 3.8 'Housing Choice' mentions that 'There is significant need for affordable family homes....'. (paragraph 3.44) and Policy 3.11 'Affordable Housing Targets' states that priority should be accorded to provision of family housing. Within the affordable rented element, there would be an absence of 2 bed units, an over provision of 1 bed units and an over provision of 3 bed family units. Overall, considering the relatively small scale of the development and the constraints of the site, this is considered beneficial.
- 8.36 Within the proposed dwelling mix for intermediate housing, there would be a slight over provision of 1 and 3 bed family units, and a slight under provision of 2 bed units, which again, is considered acceptable considering the scale of the development.

Optimising housing potential

Policy context

Regional

- 8.37 London Plan Policy 3.4 '*Optimising housing potential*' seeks to optimise housing output in different types of location taking account of local context, design principles and public transport accessibility (PTAL). The policy is supported by Table 3.2 – *Sustainable residential quality density matrix*. The London Plan acknowledges that the matrix is just one guide to appropriate density and should not be applied mechanistically as proposals should also respect the local context and provide suitable standards of living for both existing and future residents. This is reiterated at paragraph 1.3.8 of the Mayor's '*Housing*' SPG May 2016. Guidance on considering schemes above or below the ranges in the density matrix is provided in paragraphs 1.3.50 to 1.3.55 of the SPG.

Local

- 8.38 Core Strategy Policy SP02 requires new residential development to optimise the use of land and assist in the creation of sustainable places. Dwelling densities should correspond with public transport accessibility.

NPPF

- 8.39 Revised NPPF Chapter 11 concerns '*Making effective use of land*'. Paragraph 117 requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 8.40 In terms of achieving appropriate densities, NPPF paragraph 122 requires planning policies and decisions to support development that makes efficient use of land, taking into account:

"a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places."

- 8.41 NPPF paragraph 123 requires that where there is an existing or anticipated shortage of land for meeting identified housing needs (as in the London Borough of Tower Hamlets), it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.

Assessment

- 8.42 The site scores PTAL 4 'Good' (see the calculation included within the Transport Statement) and lies within an 'Urban' setting where the Mayor's policies recommend a density range of between 200 to 700 hr/ha and up to 260 units/ha.
- 8.43 The resultant residential density based on the whole site area is 318 habitable rooms per hectare. If the area is reduced to just the residential area and courtyard (0.12 Ha), this density rises to 492 hr/ha. Either way, the density is well within the London Plan density range of 200–700 hr/ha provided by Table 3.2 – *Sustainable residential quality density matrix* for 'urban' areas with PTAL 4-6.
- 8.44 The scheme will optimise housing output by a development that will be compatible with local context in terms of height, mass, orientation and visual appearance. Full details of the design approach are provided in the accompanying Design and Access Statement by StockWool Architects.
- 8.45 Technical studies have been carried out that confirm the proposal will not result in any material impacts in terms of access to, or impact on, sunlight and daylight, loss of outlook, or increased traffic generation. The submitted studies show that the proposal does not result in any adverse symptoms of overdevelopment and will create a scheme that enhances the wider surrounding area by the removal of a surface parking area and a temporary building within the conservation area and adjacent to Listed Buildings. The quantum of housing and the resultant residential density is considered to optimise housing output in accordance with the London Plan and the Mayor's 'Housing' SPG together with the Council's Core Strategy.

Housing quality

Policy context

National

- 8.46 On 27th March 2015, the Government published Technical Housing Standards – nationally described space standard that sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. These have been incorporated in the London Plan 2016.

Regional - The London Plan 2016

- 8.47 The key London Plan policy applicable to housing quality is 3.5 – ‘*Quality and design of housing development*’ that calls for housing developments to be of the highest quality internally and externally. Together with the Mayor’s ‘*Housing*’ SPG, it incorporates the Government’s nationally described space standard and jointly outline considerations relating to the size and layout of rooms. New dwellings should have adequately sized rooms with convenient and efficient layouts.
- 8.48 London Plan Table 3.3 (Figure 7 below) provides the following minimum space standards for new dwellings:

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	

Figure 7 – London Plan Table 3.3

- 8.49 All bedrooms should comply with the requirements of the Technical Housing Standards with double bedrooms a minimum of 11.5 sq.m. in area and 2.75 m. wide. A single

bedroom should be at least 7.5 sq.m. and 2.15 m. wide.

- 8.50 The nationally described space standard sets a minimum ceiling height of 2.3m for at least 75% of the gross internal area of the dwelling. The London Plan encourages a minimum ceiling height of 2.5m for at least 75% of the gross internal area so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

The Mayor's 'Housing' SPG 2016

- 8.51 Standard 26 requires a minimum of 5 sq.m. of private outdoor space to be provided for 1 & 2-person dwellings and an extra 1 sq.m. for each additional occupant. Standard 27 requires the minimum depth and width for all balconies and other private external spaces to be 1500 mm.

- 8.52 Standard 28 requires design proposals to demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Supporting text states:

"In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density." (paragraph 2.3.36)

- 8.53 Standard 29 advises that developments should minimize the number of single aspect dwellings. Single aspect dwellings that are north facing or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided.

- 8.54 Standard 32 - All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.

- 8.55 Failure to meet one standard need not necessarily lead to conflict with the London Plan, but a combination of failures would cause concern. In most cases, departures from the standards require clear and robust justification.

Local

Tower Hamlets Core Strategy 2010

- 8.56 Policy SP02 (6) 'Urban living for everyone' requires all housing to be high quality, well designed and sustainable.

Tower Hamlets Managing Development DPD 2013

- 8.57 Policy DM4 and Table 2 reiterate the London Plan's internal space standards. Private amenity space should accord with the Mayor's 'Housing' SPG.

- 8.58 Policy DM25 'Amenity' seeks to ensure adequate daylight and sunlight levels for the future occupants of new developments. Proposals are to be assessed by the

methodology within the BRE's publication 'Site layout planning for sunlight and daylight.'

- 8.59 Policy DM25 'Amenity' also seeks to ensure adequate privacy between opposing habitable room windows by seeking a separation distance of approximately 18 m.

BRE Handbook 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'

- 8.60 BRE provides advice on daylight and sunlight within proposed residential accommodation. It provides advice on room depth and the no sky line within rooms but adopts British Standard 8206 as the main criteria that recommends minimum Average Daylight Factor (ADF) values for rooms within new residential dwellings:

>2% for kitchens
>1.5% for living rooms; and
>1% for bedrooms

- 8.61 For sunlight the BRE handbook states:

"In general, a dwelling or non-domestic building which has a particular requirement for sunlight, will appear reasonably sunlit provided at least one window top a main room faces within 90 degrees within due south and the centre of at least one window to a main living room can achieve 25% of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March."

Assessment

- 8.62 The amenity of existing and proposed new residents has been a key consideration in the evolution of the design.

Residential space standards

- 8.63 The proposed residential units have been designed to achieve good standards of accommodation. The floor area of each residential unit, and bedroom sizes, meet and in some cases exceed the nationally described space standard, London Plan Table 3.3 and Policy DM4 of the Council's Managing Development DPD. The details of the floorspace and room layouts is provided within the Design and Access Statement.

Accessible Homes

- 8.64 The scheme provides 2 accessible wheelchair units in accordance with policy. Plans showing the location and layout of these two units is included with the Design and Access Statement at pages 80 - 81.

Private amenity space

- 8.65 Section 13.4 of the Design and Access Statement illustrates that all new homes will have access to private amenity space in the form of balconies, terraces or gardens. Provision for all units will meet or exceed Standards 26 and 27 in the Mayor's Housing SPG that have been adopted by the Tower Hamlets Managing Development DPD Policy DM4.

Privacy

- 8.66 Most units exceed a separation distance of 18 metres between existing neighbouring habitable rooms. Where this is not possible, between the proposed units with south facing habitable room windows and west facing room windows, these will be protected by the introduction of planted screens in the landscape or by windows built out at an angle to avoid direct overlooking.

Single aspect dwellings

- 8.67 Section 13.2 'Aspect' of the Design and Access Statement shows that there are 5 single aspect units within the scheme, the remaining units being 12 dual aspect and 5 triple aspect. All single aspect units are 1-bedroom apartments and have large south facing or south-west facing windows.

Daylight and sunlight (within the proposed development)

- 8.68 The Daylight, Sunlight and Overshadowing Assessment by XCO2 was carried out for 8 dwellings considered to be the worst-case units in terms of daylight access. All habitable rooms within these dwellings have been included in the assessment.
- 8.69 In all, 23 rooms and 37 windows were assessed. The results indicate that all 23 rooms satisfied the recommendations within the BRE's handbook. Overall, the proposed development is anticipated to achieve good levels of daylighting to all dwellings and habitable rooms and would provide good quality accommodation to the future occupants in terms of daylight.
- 8.70 For sunlight, the assessment was again carried out for 8 dwellings considered to be the worst-case units in terms of sunlight access across the scheme. A total of 8 living spaces as well as 11 bedrooms were found to have windows within 90 degrees of due south. All the living rooms were found to have at least one window passing the required criteria. Bedrooms were also found to achieve good sunlight access.
- 8.71 The analysis shows that all rooms will achieve adequate annual and winter sunlight based on the BRE Guide.
- 8.72 Overall, the levels of daylight and sunlight received by all the proposed dwellings will be very good for an urban environment.

Child play space and communal open space

Policy context

Regional

8.73 London Plan Policy 3.5 emphasises the 'Quality and design of housing developments.' Policy 3.6 'Children and young people's play and informal recreation facilities' states that all children and young people should have "...safe access to good quality, well designed, secure and stimulating play and informal recreation provision.....". The policy notes that new development should make provision for play based on the expected child population generated by the scheme and refers to the Mayor's SPG: 'Shaping Neighbourhoods: Play and Informal Recreation' (September 2012). The SPG sets a benchmark of a minimum of 10 sq.m. per child.

8.74 The Mayor's 'Housing' SPG 2016 advises on the implementation of these policies and provides:

"Standard 5 (and Policy 3.6) – For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor's Play and Informal Recreation SPG 2012."

8.75 The Play and Informal Recreation SPG outlines the Mayor's expectation for on-site play provision to be provided wherever possible. However, it recognises that provision on-site will depend on a range of factors including the size of a development and the anticipated number of children alongside the consideration of the quantity, quality and accessibility of existing off-site facilities, where these are within a reasonable distance from a proposed development.

8.76 Tables 4.5 to 4.7 of the Play SPG set out criteria to inform the type, quantity and location of required play provision for different age groups, placing emphasis on securing on-site provision for children under 5, unless existing provision is within 100m of a development. Provision for older children can be achieved by a combination of on-site or off-site provision within 400m.

Local

8.77 Core Strategy Policy SP02 'Urban Living for Everyone' requires all new housing development to provide private amenity space and communal space. Sites providing family housing should also provide adequate play space. Core Strategy Policy SP04 'Creating a green and blue grid' adds that there should be no net loss of open space through development and that opportunities for new publicly accessible open space should be maximised.

8.78 Managing Development DPD Policy DM4 'Housing standards and amenity space' requires all new housing to provide both private and communal space based on dwelling type and scale of development and that child play space should be provided based on child yields. Sub policy 2 reiterates the Mayor's 'Housing' SPG standards for minimum private amenity space for individual units and requires that minimum communal space should be calculated at 50 sq.m. for the first 10 units plus a further 1 sq.m. for every additional unit thereafter. The calculation of required play space adopts the 10 sq.m. per child provided by the Mayor's SPG: *Shaping Neighbourhoods: Play and Informal Recreation* (September 2012).

NPPF

- 8.79 Revised NPPF Chapter 8 concerns 'Promoting healthy and safe communities'. This should be achieved by measures that include access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities (paragraph 96).

Assessment

- 8.80 Langdon Park (400m from the site), Jolly's Green (500m from the site), Millennium Green (600m from the site), and the Leven Road play space (675m from the site) are all within 5 to 10 minutes walking distance. Each provide areas of public open space and child play space. Section 3.4 'Green Space & Flood Risk' of the Design and Access Statement shows the site in relation to these spaces. Pages 38 and 39 of the Landscape Proposals document sets out the details of the schemes play and amenity space strategy.

Communal open space

- 8.81 Following Policy DM4 of the Managing Development DPD the recommend amount of communal space for the scheme is 62 sq.m. based on 22 units. This can be comfortably met within the smaller courtyards between the new residential units and Bromley Hall and between the new residential units and the existing live/work units.

Child Play Space

- 8.82 The GLA's Child Yield Calculator is shown in Figure 8 below and calculates the child population and play space requirement for the site.

Assessing child occupancy and play space requirements							
Size of your development:							
Number of FLATS							
	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Social rented/affordabl	0	2	0	2	0	0	4
Intermediate	0	1	1	1	0	0	3
Market	0	8	6	1	0	0	15
Total	0	11	7	4	0	0	22
Number of HOUSES							
	1 bed	2 bed	3 bed	4 bed	5 bed	Total	
Social rented/affordabl	0	0	0	0	0	0	0
Intermediate	0	0	0	0	0	0	0
Market	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
Proportion of children							
	Number of children	%					
Under 5	2	43%					
5 to 11	2	35%					
12+	1	22%					
Total	6	100%					
Play space requirements							
GLA benchmark (sqm)*	Alternative local benchmark (sqm)**	Total (sqm play space) required					
10		58.6					
	5	29.3					

Figure 8 – GLA's Child Yield Calculator

- 8.83 The total play space area requirement is 58.6 metres. The area of the central landscaped courtyard garden is approximately 100 sq.m. and therefore easily achieves the child play space requirement. In practice, the space requirement for the 0-4 years is calculated as 25.19 sq.m. This requirement can be met within the courtyard garden while the remaining play requirement for 5-11 years and 12+ years can be offset by the provision within the surrounding area.
- 8.84 The arrangements are considered in line with the Mayor's Play SPG which emphasises on-site provision for children under 5 and provision for older children can be achieved by a combination of on-site or off-site provision within 400 metres. In the case of this development there is ample spare child play space capacity at Langdon Park which also provides a wide range of active play provision for older children.

Office Development

Policy context

Regional

- 8.85 London Plan Chapter 4 provides policies addressing London's Economy. Policy 4.3 (b) 'Mixed use development and offices' states that mixed use development and redevelopment should support consolidation and enhancements to the quality of the remaining office stock in the types of strategically specified locations identified in paragraph 4.12. In this respect:

"... the Mayor encourages the renewal and modernisation of the office stock in viable locations in outer and inner London and urges boroughs to manage changes of surplus office space to other uses." (Paragraph 4.12)

Local

- 8.86 Chapter 5 of the Core Strategy, 'Enabling Prosperous Communities' seeks to support the growth of existing and future businesses in accessible and appropriate locations (SO16). Policy SP06 states that the Council will promote the creation of a sustainable, diversified and balanced economy by ensuring a sufficient range, mix and quality of employment uses and spaces, with a particular focus on the small and medium enterprise sector. It will do this by encouraging and retaining the provision of units (of approximately 250 sq. m. or less) suitable for small and medium enterprises.
- 8.87 Policy DM15 'Local job creation and investment' of the Development Management Plan notes that development which is likely to adversely impact on or displace an existing business must find a suitable replacement accommodation within the borough unless it can be shown that the needs of the business are better met elsewhere. It goes on to state that the development of new employment floor space will need to provide a range of flexible units including units less than 250 square metres and less than 100 square metres to meet the needs of Small and Medium Enterprise (SMEs).

- 8.88 The site lies outside of a Local Industrial Location and Local Office Location

National

- 8.89 Chapter 6 of the NPPF 'Building a strong competitive economy' states at paragraph 80 that:

"... planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."

Assessment

- 8.90 The development proposal will introduce high quality and flexible office/workspace in a new building on the western frontage of the site. This will physically connect with the existing business space already provided within the Old Poplar Library and Bromley Hall. It will also replace the space already being provided within the temporary building at RedBox. The building typology specifically targets small and medium enterprises, and

as described in Section 4 above, it is intended that the this business space contributes to the formation of an enterprise cluster along with Poplar HARCA's other business uses currently being completed adjacent to the A12 road less than 100 meters to the south.

Urban design and heritage

Policy context

Regional

- 8.91 The Mayor's objectives for London include: "*a city of diverse, strong, secure and accessible neighbourhoods ...*" and a place that "*... delights the senses and takes care over its buildings and streets...*"
- 8.92 London Plan Policy 3.5 '*Quality and design of housing developments*' requires the design of all new housing developments to enhance the quality of local places taking into account physical context and local character.
- 8.93 London Plan Policy 7.1 '*Lifetime neighbourhoods*' provides guidance on building neighbourhoods and communities. It requires places to be designed so that their layout, tenure, and mix of uses interface with surrounding land and improve people's access to social and community infrastructure. The policy advises that developments should create inclusive environments where buildings, streets and open spaces respond positively to the pattern and grain of the existing place, have a human scale and contribute to establishing an enhanced character for the future function of the area.
- 8.94 London Plan Policy 7.2 '*An inclusive environment*' requires all new development to achieve the highest standards of accessible and inclusive design.
- 8.95 London Plan Policy 7.4 '*Local character*' requires development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Buildings should provide a high-quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass; be human in scale, allow existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area and be informed by the surrounding historic environment.
- 8.96 London Plan Policy 7.6 '*Architecture*' requires architecture to work within the context of its setting and contribute to a strong coherent public realm and streetscape. Buildings should incorporate the highest quality materials.

Local

- 8.97 Tower Hamlets Core Strategy Policy SP10 '*Creating distinct and durable places*' seeks to ensure that buildings and neighbourhoods promote good design principles to create buildings, spaces and places that are high-quality, sustainable, accessible, attractive, durable and well-integrated with their surroundings.
- 8.98 The same policy also states the need to protect and enhance statutory listed buildings and conservation areas as well as other buildings and areas that are identified through the Conservation Area Character Appraisals and Management Guidelines. Sub-section 3 of the policy adds that developments should protect, conserve, and promote the beneficial reuse of, old buildings that provide suitable locations for employment uses, including small and medium enterprises

- 8.99 Core Strategy Policy SP12 provides the Council's key principles for 'placemaking' to ensure places are well designed and respect features that contribute to each place's character and distinctiveness.
- 8.100 These principles are followed in the Managing Development Document and Policy DM24 'Place-sensitive design' requires developments to be built to the highest quality standards. This includes being sensitive to and enhancing the local character and setting and use of high-quality materials.
- 8.101 Policy DM27 requires development to protect and enhance the borough's heritage assets, their setting and their significance as key elements of developing the sense of place. In more detail, sub-section 2 of the policy advises that applications for the alteration, or development within a heritage asset will only be approved where it does not result in an adverse impact on the character, fabric or identity of the heritage asset or its setting; it is appropriate in terms of design, scale, form, detailing and materials in its local context; it enhances or better reveals the significance of the asset or its setting; and opportunities to mitigate or adapt to climate change through the re-use or adaptation are maximised. Sub-section 3 notes that proposal involving the demolition of a designated heritage asset will only be considered under exceptional circumstances.
- 8.102 Limehouse Cut Conservation Area Character Appraisal (2011)
The Leaside Business Centre is situated within a spur of the Limehouse Cut Conservation Area. The Conservation Area Character Appraisal and Management Guidelines were adopted in August 2011. Figure 9 below shows the boundary of the conservation area in relation to the application site.



Figure 9 – Excerpt from conservation area plan showing site

- 8.103 The Appraisal includes reference to the application site and notes:

"Included within this cluster are a number of important buildings along Gillender Street, which is the surviving southern part of St Leonard's Street and the northern part of Brunswick Road. Of these perhaps the most architecturally important are Bromley Hall and Bromley Public Library.

Bromley Hall is the oldest of these buildings having Tudor origins. Built between 1482 and 1495 it was the manor house of South Bromley and is a rare survival of a substantial brick structure from the early Tudor period. In 1531 with the dissolution of the monasteries, the building was seized and refurbished for personal use by Henry VIII. The building's present appearance relates largely to an early 18th century remodelling, but recent repairs have uncovered significant elements of the original Tudor building including wall painting inside.

Bromley Library (1904-06) is a handsome public library building. Baroque in character the building has a rusticated basement, two storeys and attic with balustrade. The frontage has four recessed bays centrally and is divided by giant Ionic columns.

The sympathetic repair of Bromley Public Library and Bromley Hall, together with the introduction of the new containers by Containerspace Ltd, (Nicholas Lacey and Partners 2004), have begun regeneration of the area but potential for further enhancement taking advantage of the riverside location remains." (Page 10)

- 8.104 The document summarises that: *"The robust industrial character and appearance of the area as described in this appraisal define its special qualities and significance."* (page 20). A full and detailed description of the scheme proposal within the context of the listed buildings and conservation area is provided in the Heritage Assessment.

NPPF

- 8.105 Revised NPPF Chapter 12 (and the PPG) highlight the importance of 'Achieving well designed places.'
- 8.106 NPPF paragraph 124 confirms that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. The Framework advises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is said to be essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process. As explained, Poplar HARCA has responded positively to the pre-application advice (see the Design and Access Statement) provided by Council officers and the local community (see the Statement of Community Involvement).
- 8.107 NPPF paragraph 127 is particularly relevant to this application that will meet all five of the NPPF's tests at a) to f) to ensure that developments:
- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*

8.108 In respect of conserving and enhancing the historic environment, paragraph 189 notes that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 192 makes the point that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

8.109 Paragraph 196 adds that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Assessment

8.110 Poplar HARCA's vision is to provide high quality new buildings that will strengthen the character and appearance of this part of the Limehouse Cut Conservation Area. The proposal incorporates both listed buildings and retains them for beneficial modern use without loss of their historic integrity and in a way that will positively preserve them for future generations.

8.111 The design and massing of the proposed new buildings have been developed to fit within the context of the adjacent developments and will be constructed in materials and a style that reflects the industrial history of the area as highlighted in the Conservation Area Character Statement.

8.112 Full details of the design philosophy, evolution, approach and details of the proposed facing materials is contained in the Heritage Assessment and the Design and Access Statement. In summary, the Heritage Assessment states that:

"The impact of the application proposals on the historic fabric of Bromley Hall are limited to the south flank elevation. It has been established that the removal of the existing single storey extension would not detract from the significance of the historic building. The proposed glazed link would be visually subordinate to the

listed building and be recessed further back from the front of the building than the existing extension. The provision of a new door at first floor level utilises an existing opening and involves minimal change to the surrounding fabric.

The impact of the application proposals on the listed former Poplar Library building are minimal and are limited to the creation of a link at ground floor utilising an existing light well currently hidden from view." (Paragraphs 8.10 and 8.11)

Transport

Policy context

Regional

- 8.113 London Plan Chapter 6 deals with 'London's Transport.' The key policies applicable to the development are the Strategic Approach (Policy 6.1), Assessing effects of development on transport capacity (Policy 6.3), Cycling (Policy 6.9), Walking (Policy 6.10), and Parking (Policy 6.13).
- 8.114 Policy 6.1 provides the strategic approach to the integration of transport and development. The policy encourages patterns and nodes of development that reduce the need to travel, especially by car making it safer and easier for people to access jobs, shops, leisure facilities and services by public transport, walking and cycling. Boroughs should use the standards set out in Table 6.2 to set maximum car parking standards in their DPDs.
- 8.115 Policy 6.3 requires development proposals to ensure that impacts on transport capacity and the transport network, at both corridor and local level, are fully assessed. Local authorities should exploit opportunities for development in locations where there is good public transport accessibility. Transport Assessments are required for all major development.
- 8.116 Policy 6.9 requires development to provide secure, integrated and accessible cycle parking facilities and the promotion of safe, accessible and convenient walking routes to transport nodes and other key uses to encourage cycling and walking. Recommended minimum standards for cycle parking are set out in Table 6.3 (see Figure 10 below).

Figure 10 - London Plan minimum cycle parking standards – Table 6.3

B1 Business Offices	<p>Long Stay: Inner/Central London: 1 space per 90 sqm (Policy T5 of the emerging London Plan increases this to 1 space per 75 sqm) Outer London: 1 space per 150 sqm</p> <p>Short Stay: First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm</p>
C3 (Dwellings)	<p>Long stay: 1 space per studio or 1 bed unit 2 spaces for all other units</p> <p>Short stay: 1 space per 40 units</p>

8.117 Policy 6.10 states that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space by referring to Transport for London's Pedestrian Design Guidance. This should involve the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity.

8.118 Policy 6.13 'Parking' explains that The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Policy 6.13 refers to maximum car parking standards for different land uses set out at Table 6.2 (see Figure 11 below). Policy 6.13 also states that 1 in 5 parking spaces should provide electrical charging points; that there should be adequate parking for disabled drivers in line with Table 2 and suitable parking for the needs of businesses for deliveries and servicing.

Figure 11 - London Plan maximum car parking standards – Table 6.2

Maximum residential parking standards			
Number of beds	4 or more	3 bed	1-2 bed
	2 – 1.5 per unit	1.5 - 1 per unit	Less than 1 per unit

8.119 London Plan Table 6.2 also provides that in 'Urban areas' with PTAL 2 to 4 parking provision for units of densities between 70-170 u/ha should be 'up to one space per unit' and for densities between 45-145 u/ha provision should be 'Up to 1.5 spaces per unit'. A note adds:

- All developments in areas of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit.
- Adequate parking spaces for disabled people must be provided preferably on-site
- 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

8.120 The Mayor's 'Housing' SPG Standard 18 says each designated wheelchair accessible dwelling should have a car parking space that complies with Building Regulations Part M4 (3). Standard 19 advises that careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open spaces.

8.121 An addendum to the plan states that non-residential elements of a development should provide at least one accessible on or off-street car parking bay designated for Blue Badge holders, even if no general parking is provided.

Local

8.122 Strategic Objective SO20 of the Tower Hamlets Core Strategy is to:

"Deliver a safe, attractive, accessible and well-designed network of streets and spaces that make it easy and enjoyable for people to move around on foot and bicycle."

- 8.123 Core Strategy Policy SP09 '*Creating attractive and safe streets and spaces*' provides detail on how the objective is to be met promoting '*car free*' development in areas of good public transport accessibility.
- 8.124 Tower Hamlets Managing Development DPD Policy DM20 '*Supporting a sustainable transport network*' requires development to demonstrate that it is properly integrated with the transport network without unacceptable impacts on network capacity and safety. It seeks to minimise car travel and prioritise movement by walking, cycling and public transport. The policy requires major development proposals to be supported by transport assessments and a travel plan.
- 8.125 Managing Development DPD Policy DM22 '*Parking*' refers to parking standards set out in its Appendix 2. These stipulate that for residential use in locations with PTAL 3 & 4, parking for units with less than 3 bedrooms should not exceed 0.3 spaces per unit and not exceed 0.4 spaces per unit for 3-bedroom plus units. No additional provision should be made for visitor parking. The minimum parking requirements for disabled people where the site has off-street car parking is 2 spaces or 10% of the total parking (whichever is the greater) and for development without off-street parking provision should be 1 space on-site. Where site constraints mean provision is unfeasible or not safe, development will be required to demonstrate how a disabled person can park to use the development with ease.
- 8.126 Cycle parking for residential should be one space per 1 and 2-bedroom units and two spaces per 3-bedroom + units. This standard has been superseded by the London Plan 2016 that requires 1 space per studio or 1 bed unit and 2 spaces for all other units. For office use, the requirement is a minimum of 2 cycle parking spaces,
- NPPF
- 8.127 Revised NPPF Chapter 9 address '*Promoting sustainable transport*'. Paragraph 103 requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 8.128 In assessing applications for development, NPPF paragraph 108 says it should be ensured that:
- "a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*
- 8.129 NPPF paragraph 109 says that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 8.130 NPPF paragraph 110 requires applications for development to:

- a) *"give priority first to pedestrian and cycle movements and second – so far as possible – to facilitating access to high quality public transport;*
- b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."*

Assessment

Impact on local transport infrastructure

- 8.131 The Leaside Business Centre scores a PTAL 4 'Good'. The site is roughly equidistant between Bromley-by-Bow Underground Station (serving the District and Hammersmith & City Lines) and Langdon Park DLR station, each approximately a 5-minute walk. Bus routes 108/D8 and 309 serve the site with stops on the A12 road at the front of the site, and on Zetland Street some 200 metres to the west. From here services run between Stratford, Isle of Dogs, Canning Town and Mile End.
- 8.132 The site's good public transport availability together with a scheme presenting a pedestrian only and safe environment accords with local, regional and national policy to promote sustainable development.
- 8.133 The Transport Statement notes that given the decrease in movements created by the development and the good sustainable travel connections in vicinity of the site, trips generated by the development will present a negligible impact in terms of traffic impact and improve highways safety.

Car Parking

- 8.134 The Leaside Business Centre currently provides 22 off-street car parking spaces within a secure compound with access directly from the A12 Road. These spaces are managed for business users within the centre. In addition, there is a limited amount of 'add-hoc' parking which takes place in front of the Library building. The internal parking courtyard is also used for servicing and deliveries, thus making it a relatively congested area. Furthermore, site access and egress to the road requires vehicles to cross the pedestrian footpath.
- 8.135 In line with current planning policy the planning application, while retaining a similar amount of commercial floorspace, and introducing 22 new dwellings, will be car-free, which given the good accessibility to public transport, cycle routes and local facilities is considered appropriate.

- 8.136 The scheme will introduce a much-enhanced lay-by facility on the A12 road in front of the new commercial 'link' building and extending in front of the Library. This will improve the arrangements for deliveries and servicing and could include a single disabled parking bay. These changes will much reduce vehicular movements to and from the site via the A12 road and avoid vehicles crossing the footpath allowing the enhancement of the pedestrian environment.

Deliveries and Servicing

- 8.137 As noted above, all deliveries and servicing will take place from A12 road frontage. The scheme layout has been organised to facilitate this with a reception/concierge office introduced within the new commercial building overlooking the lay-by. The site will be highly managed with postal and other deliveries being received at the reception before being collected or distributed. Staff within the new centre will also be responsible for bringing waste bins to a pick-up point near to the lay-by on collection days.

Cycle Parking

- 8.138 Based on Table 6.3 of the London Plan and the Mayor's 'Housing' SPG, and the Council's Local Plan, the scheme will provide 35 secure cycle parking spaces for the residential units. These will be located on the ground floor of the residential block. The scheme will also provide 6 long-term and one short-term cycle parking spaces for the office use. These will be located in a purpose-built store at the southern end of the site within the courtyard area close to the Poplar Library. The details of the cycle parking is presented in the Design and Access Statement.

Further Supporting Information

- 8.139 In line with emerging London Plan (Policies T2 and T4), the application includes a Healthy Streets Assessment and a Construction Logistics Plan. In addition, a Servicing and Deliveries Plan and a Draft Travel Plan is submitted.

Potential Future Access and Servicing

- 8.140 Immediately to the east of the application site is Ailsa Wharf. As noted in Section 7 above, this site is subject of a recent planning permission for comprehensive redevelopment. It is also one of the Council's Site Allocations. The Ailsa Wharf scheme proposes to introduce a service road running adjacent to the eastern boundary of the Leaside Business Centre site. The Applicant is in discussion with the developers of this site to secure access from this new road into the Leaside Business Centre. This will support the introduction of two disabled parking bays within the courtyard of the adjacent live work units (within the Applicant's control) and allow waste collection from the rear of the site avoiding the need to use the A12 Road.

Conclusion

- 8.141 The development will accord with relevant transport policy and can be successfully accommodated by the local transport network and existing public transport facilities. London Plan car and cycle parking standards will be met for the proposed new housing and office use. The proposals are reasonable and appropriate for the location and there is no reason why planning permission should be withheld on traffic and transport grounds. A full assessment of the transport situation and proposals is contained within the Transport Assessment.

Refuse and recyclables

Policy context

Regional

- 8.142 London Plan Policy 5.17E requires the provision of suitable waste and recycling storage facilities in all new developments. Since January 2015, waste collection authorities are required to collect waste paper, metal, plastic and glass separately as a minimum to increase the quality and quantity of recycled material and reduce contamination. The provision and design of waste recycling facilities within residential developments should support and enable collection authorities to meet this requirement.
- 8.143 The management of waste and recycling in flatted developments poses particular challenges and needs to be factored into the design of individual dwellings and buildings at an early stage with adequate, accessible and convenient waste and recycling storage and collection facilities provided. Measures should be put in place to manage impacts on residential amenity to acceptable levels in terms of odour, noise and dust and address potential safety, security and hygiene issues.
- 8.144 The Mayor's 'Sustainable Design and Construction' SPG April 2014 sets the following requirements regarding waste for new developments:
- (i) Construction Phase: Developers should maximise the use of existing resources and materials and minimise waste generated during the demolition and construction process through the implementation of the waste hierarchy.
 - (ii) Occupation Phase: Developers should provide sufficient internal space for the storage of recyclable and compostable materials and waste in their scheme. The design of development should meet borough requirements for the size of location of recycling, composting and refuse storage and its removal.
- 8.145 The Mayor's 'Housing' SPG 2016 advises:
- "Standard 22 - Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.*
- Standard 23 - Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings."*
- 8.146 With weekly collections, the Code recommends 100 refuse litres for a single bedroom dwelling, with a further 70 litres for each additional bedroom and 60 litres internal space for the storage of recyclable waste.
- #### Local
- 8.147 Core Strategy Policy SP05 says the borough will implement the waste management hierarchy of reduce, reuse and recycle, by:
- a. Ensuring that local residents reduce and manage their waste effectively.

- b. Requiring non-waste developments to appropriately design and plan for waste storage and recycling facilities.*
- c. Requiring all developments to reduce and reuse waste from construction and demolition.*
- d. Supporting developments that use recycled materials.*

- 8.148 Tower Hamlets Managing Development DPD Policy DM14 requires development to demonstrate appropriate storage facilities for residual waste and recycling. Major development should provide a Waste Reduction Management Plan for the construction and operation phases. Managing Development DPD Table A4 advises that with weekly collection, storage for refuse and recyclables should be: 1 bed 100 & 60 litres, 2 bed 120 & 60 litres, 3 bed 180 & 80 litres and 4 bed 240 & 100 litres.

Assessment

- 8.149 Section 13.6, page 79 'Refuse & Collection' of the Design and Access Statement and paragraphs 4.7 to 4.9 of the Transport Assessment provides details of the refuse and recycling arrangements for the proposed development.
- 8.150 Construction waste will be dealt with through a waste management hierarchy within a Waste Reduction Management Plan. Best practice waste reduction measures will be developed in line with the waste hierarchy to reduce, reuse, and recycle. A Waste Reduction Management Plan will be drafted during detailed design and implemented by the appointed contractor. This can be conditioned by any planning permission if necessary.
- 8.151 For both commercial and residential operational waste management storage arrangements will be provided in the form of a series of bin stores appropriately located within the scheme, allowing residents to drop off black sacks and recyclables.
- 8.152 While the scheme proposal is effective and complies with the planning authority's requirements, there is a potential future phase which could allow waste collection to be handled from the eastern boundary of the site. This relies on a recently approved development proposal on adjacent land being implemented. Should this be the case, and should agreement be reached between the Applicant and adjacent developer, it is proposed that access to the application site be introduced such that refuse collection can be collected from the eastern boundary rather than adjacent to the A12 road.
- 8.153 The Design and Access Statement sets out the distribution of the proposed bin stores and their capacity, it also illustrates how this might alter should the alternative future development be implemented.
- 8.154 In summary, the proposed development complies with development plan policy and the Mayor's SPGs by ensuring that both the construction and the operational waste will be managed in accordance with the waste hierarchy.

Access & social Inclusion

Policy context

Regional

- 8.155 London Plan Policy 7.2 '*An inclusive environment*' requires all new development to achieve the highest standards of accessible and inclusive design. Design and access statements submitted with development proposals should explain how the principles of inclusive design have been integrated into the proposed development.
- 8.156 Policy 3.8 '*Housing choice*' requires that 10% of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users and meet Building Regulation requirement M4 (3) '*wheelchair user dwellings.*'
- 8.157 The Mayor's Housing SPG paragraph 2.1.4 explains that the design standards reflect the Mayor's policy for new housing to meet the needs of all Londoners at different stages of life.

Local

- 8.158 Tower Hamlets Core Strategy Policy SP02 '*Urban living for everyone*' requires all new housing to comply with accessibility standards. The implementation of these criteria is explained at paragraphs 4.3 and 4.4 of the Managing Development Document.

National

- 8.159 NPPF Chapter 8 addresses '*Promoting healthy and safe communities*' and paragraph 91 requires planning decisions should aim to should aim to achieve healthy, inclusive and safe places. Similarly, Chapter 12 '*Achieving well-designed places*' paragraph 127 requires development to create places that are safe, inclusive and accessible.

Assessment

Site levels and inclusive access

- 8.160 The design process has examined and tested the scheme to ensure that it will create a safe and accessible environment. A detailed assessment of the issues and solutions is provided in the Design and Access Statement and Landscape proposals.
- 8.161 Key pedestrian routes and open spaces within the site will be overlooked and will feel comfortable for people to use them.

Wheelchair Housing

- 8.162 10% of the units (two units) will be easily adaptable for residents who are wheelchair users. As such, the scheme is compliant with policies in the development plan and the Mayor's '*Housing*' SPG including the Best Practice Guidance for Wheelchair Accessible Housing together with the NPPF.

09 | impact

Introduction

9.1 National and local policies indicate that permission should not be granted for development that causes demonstrable harm to the amenity of occupiers or neighbours. To this end, a range of additional detailed assessments have been carried out to fully understand all key impacts of the development and to enable the design team to properly consider these in the preparation of the final scheme proposal. The assessments include:

- Historic Environmental Assessment
- Daylight, Sunlight and Overshadowing Assessment
- Flood Risk Assessment
- Air Quality Assessment
- Ecology Survey and Report
- Energy Statement
- Sustainability Statement
- Foul and Surface Water Drainage Strategy
- Utilities Assessment
- Noise Impact Assessment

9.2 This following highlights particular issues raised in the various technical assessments and provides detail on how these have been dealt with through the design and management of the development. The full technical detail is contained within the individual statements submitted with the application.

Historic Environmental Assessment

9.3 The Museum of London Archaeology (MOLA) carried out a Historic Environment Assessment on behalf of the Applicant in February 2019. The results of this assessment have been shared with Historic England who concur with their conclusions and recommended next steps. In addition, the conclusions have assisted in the design of the development and the landscape proposals.

9.4 This desk-based study has assessed the impact of the scheme on buried heritage assets (archaeological remains). Those assets that may be affected by the proposals comprise:

- The remains of early post-medieval former buildings. There is a low-moderate potential for the remains of the former range of buildings built between the 17th and 19th century to be present at the western half of the site.
- Roman remains. Roman agricultural features were recorded 45m south of the site, and there is moderate potential for Roman agricultural features within the site area.

- 9.5 The remainder of the site is known to have remained rural pasture, garden and yard areas since the earliest historic maps, which date from 1766. The impact of a bomb crater during the Blitz of the Second World War will have affected the survival of any archaeological remains within the footprint of the crater, however its precise location, depth and width are not known.
- 9.6 The construction of the mid-20th century buildings against the south wall of Bromley Hall (the current visitor centre) at the west of the site will have had an impact on the survival of any archaeological features within this area, particularly those related to early post-medieval buildings which can be seen on historical mapping.
- 9.7 The construction of the mid-20th century petrol station in the southwest of the site will have had an impact on the survival of any archaeological features within this area, such as those related to early post-medieval buildings and garden features, due to the presence of underground tanks, foundations, and services.
- 9.8 The archaeological potential of the site is likely to be limited to remains of no more than low significance, and in view of this, it is considered unlikely that the local authority would request further site-specific archaeological evaluation of the site either pre- or post- determination of planning consent.
- 9.9 This assessment has however identified potential for remains of lesser significance and it is possible that an archaeological watching brief would be required during preliminary ground preparation and subsequent foundation construction, which would ensure that any archaeological assets were not removed without record. This strategy could be refined by the prior archaeological monitoring of geotechnical investigations, which would clarify the nature and depth of deposits. Based on the results it is possible that no further work be necessary.
- 9.10 Any work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a standard archaeological planning condition set out under the granting of planning consent.
- 9.11 Daylight, Sunlight and Overshadowing Assessment
Daylight and Sunlight analysis was carried out for the proposed development in February 2019 to inform the height, mass and location of the proposed residential block. This study was refined in June of this year to confirm the impacts on the existing buildings and on the quality of daylight and sunlight to the proposed buildings, and extent of overshadowing on the amenity spaces.
- 9.12 For the existing buildings, the following assessments were carried out:
- Daylight: 25 Degree Line
 - Daylight: Vertical Sky Component
 - Sunlight: Sunlight Access
 - Sunlight: Sunlight Overshadowing
- 9.13 A total of 26 windows from buildings surrounding the site were highlighted as being in close proximity to, and facing the proposed development.

- 9.14 In summary,
- 2 out of 26 windows passed the 25-degree line test;
 - 10 of the remaining 24 windows achieved VSCs greater than 27%;
 - 7 windows achieved relative VSCs over 0.8 of their former values
 - 5 windows failing the above criteria are attached to non-domestic spaces
 - The remaining 2 windows achieve VSCs of 18.5% and 23.8% respectively, which are considered typical within an urban environment. The windows are currently located behind tall hedges at the site boundary, and therefore the rooms connected to them are not considered to rely on high levels of daylight under the existing scenario. As such, the daylight levels achieved with the proposed scheme in place are considered acceptable.
- 9.15 Overall, the development is not anticipated to have notable impact on the daylight received by neighbouring properties.
- 9.16 In terms of the sunlight assessment, the analysis indicated that there were no surrounding windows facing within 90 degrees due south in the identified surrounding buildings that could be affected by the proposed development. Therefore, the proposed development at 43-45 Gillender Street is not considered to have any impact on sunlight access to windows of surrounding developments.
- 9.17 The results of the analysis for the planning application, assessing the daylight and sunlight received by the residential habitable spaces of the proposed development.
- 9.18 In terms of daylight, the rooms evaluated in the internal daylight assessment include open plan kitchen, living room, dining spaces, and bedrooms within the proposed development. The assessment was carried out for 8 no. dwellings considered to be the worst-case units in terms of daylight access across the scheme. All habitable rooms within these dwellings have been included in the assessment.
- 9.19 Overall, the proposed development as a whole is anticipated to achieve good levels of daylighting to all dwellings and habitable spaces, and is therefore considered to provide good quality of accommodation to the future occupants in terms of daylight.
- 9.20 The sunlight assessment was carried out for 8 no. dwellings considered to be the worst-case units in terms of sunlight access across the scheme. A total of 8 living spaces with at least one main window facing within 90° of due south each were assessed for solar access. The analysis has shown that all 8 living spaces will achieve adequate annual and winter sunlight based on the BRE Guide. It can be concluded that the proposed design offers optimum accessibility to sunlight in living spaces considering the context and limitations of the site.
- 9.21 In terms of overshadowing, a solar access analysis was undertaken for one amenity space for the full 24 hours on 21st of March in line with the BRE guidance.
- 9.22 The amenity space is predicted to achieve a minimum of 2 hours of sunlight on 21 March over at least 50% of its area. The open space of the proposed development is therefore considered to be adequately sunlit.

Flood Risk Assessment

9.23 A flood risk assessment for the site was carried out by agb Environmental Ltd who concluded that:

- The Environment Agency Risk of Flooding from Rivers and the Sea (RoFRaS) database indicates a 'Low' risk of flooding.
- The site benefits from flood defences.
- The site has not been impacted by historic flooding from any source.
- The potential risk from Surface Water (Pluvial) Flooding is considered 'Negligible.'
- The potential risk from Groundwater Flooding is considered 'No Risk'.
- It is considered unlikely that the proposed development would pose a flood risk to land or property external to the site.

9.24 Overall, it is recommended that the FFL for both the Front and Rear Buildings be set as high as practically possible; and that appropriate Environment Agency recommendations for Flood Resistant/Resilience measures be incorporated as part of the redevelopment.

Air Quality Assessment

9.25 agb Environmental Ltd have carried out an air quality assessment of the site and scheme. They concluded that it will be necessary to implement mitigation measures to minimise dust emission during the construction. However, with these measures in place, it is expected that any residual effects will be insignificant.

9.26 Without mitigation, there is a risk that new residential receptors will be located in an area where there are exceedances of the annual mean NO₂ objective. With mitigation, the impacts of local traffic on the air quality for users of the proposed development have been shown to be acceptable at the worst-case locations assessed, with predicted concentrations below the air quality objectives, and the air quality impact due to road traffic is judged to be insignificant.

9.27 The proposed development has been shown to be air quality neutral with regard to buildings; however, the development is not air quality neutral with regard to transport emissions. Mitigation will need to be agreed with the council to off-set the excess transport emissions and minimise the cumulative air quality impact of the proposed development.

9.28 With mitigation, there should be no constraints to development at the site with regard to air quality as the proposed development is consistent with the NPPF, London Plan, spatial policy SP03 and SP10 of the Tower Hamlets Core Strategy; and policy DM9 of the Tower Hamlets Managing Development Document.

Ecology Survey and Report

9.29 agb Environmental Ltd carried out an ecological impact assessment of the application site in May of this year. Their conclusions are:

- The site is considered to be of negligible importance due to the low ecological value of its dominant habitats and lack of plant diversity.
- There are no anticipated significant impacts from the proposed development on any features of ecological importance.

9.30 In terms of actions it is recommended that the developer:

- Clear any woody vegetation and buildings outside the nesting bird season, or after a nesting bird survey by an ecologist if clearance is scheduled between March and August (inclusive).
- Cover trenches or provide planked escape routes to allow any animals that fall in to escape.
- Install nest boxes / houses for wildlife, create biodiverse green roofs, plant native species and avoid the use of pesticides.

Energy Statement

9.31 Energy Council have evaluated the scheme in terms of the energy hierarchy illustrated below and have found the development to comply with ADL1A and ADL2A 2016 through fabric efficiency measures alone, before the application of low and zero carbon technologies. The development is serviced by highly efficient gas boilers for space heating and hot water, with a photovoltaic array on new-build elements totalling 10kWp to further reduce emissions.

9.32 The principles of a Be Lean, Be Clean, Be Green design philosophy have been applied, which results in an overall 21% improvement over Building Regulations Part L1A, L2A and L2B 2016, as indicated in Figure 12 below. A full design specification that confirms inputs used within the SAP calculations is provided within the appendices of their report.

	Total Regulated CO2 Emissions (KgCO ₂ /Yr)	
Baseline Regulated Emissions of Development (pre improvement)	31,695	
Be Lean, Be Clean & Be Green	24,992	
Total Reduction in Energy (KgCO ₂ /yr)		6,703
Percentage Improvement in Carbon Emissions (above Bldg Regs Part L 2016)		21.15%

Figure 12 – Proposed development CO2 emissions against Building Regulations Part L

Sustainability Statement

9.33 Energy Council has reviewed the current project and provided guidance to achieve sustainability enhancement. The proposed scheme will ensure that a quality sustainable new development is created. This will offer building occupiers, and the surrounding area added benefits in terms of quality of living standards, lower energy and water bills and enhanced/improved surroundings and facilities.

- A preliminary assessment has been undertaken to review how the layout, orientation, design and materials used in the construction of the development will impact on the sustainability. This assessment has been used to consider and evaluate best practise energy efficient and sustainable design with a number of measures identified in the report.
- Water efficiency will be promoted throughout the development through the incorporation of water efficient fittings and water metering. Reduction in water usage indirectly impacts on energy usage embodied carbon reductions through water treatment.
- Procurement and construction processes will be carried out to minimise the environmental impacts of materials, with sustainable locally sourced and/or recycled materials being selected wherever practically possible. This also impacts on embodied carbon and energy usage.
- The development provides compliance with the sustainability measures in the Tower Hamlets Core Strategy 2025 (2010) through a holistic range of sustainability and energy efficiency measures to ensure impact is minimised.
- The new-build Leaside Business Centre building can achieve a score of 72.78% under the BREEAM New Construction 2018 scheme, confirming a targeted rating of Excellent with a buffer of 2.78%.

9.34 Overall, the development is considered to significantly accord and contribute positively to the energy, environmental and sustainability standards set out in the London Borough of Tower Hamlets planning policy.

Noise Impact Assessment

9.35 AIRO carried out a noise assessment at the development site in June 2019. The conclusions within their Acoustic Design Statement notes that the measured noise levels were dominated by road traffic on the A12 and industrial noise from the waste lorry depot adjacent to the north-eastern boundary of the site.

9.36 The Statement assesses the front of the site adjacent to the roadside to be 'High' Risk whereas the rear of the site, which is protected from the road noise has a 'Low' noise risk during the day but a 'High' risk at night due to the noise generated from the adjacent lorry depot.

9.37 A full ProPG Stage 2 assessment has been carried out which shows that the target internal noise levels can be achieved provided suitable façade mitigation measures are employed. The highest façade sound insulation is required to bedrooms facing the waste lorry depot with a slight view of the A12 where secondary glazed windows and attenuated ventilation systems are likely to be required. Elsewhere standard double-glazed systems with suitable ventilation should be adequate provided the proposed infill office building to the front of the site is built as proposed.

- 9.38 Noise levels within the proposed shared amenity space should satisfy the standards as will the balconies facing this space. Private balconies facing the lorry depot, however, are likely to exceed the target and are likely to need to be fully enclosed as winter gardens.
- 9.39 The recommendation to the decision maker relating to the residential proposal is to grant consent with suitable noise conditions.
- 9.40 It is expected that by following the guidance within the report, the internal noise levels of the proposed residential dwellings and the offices would satisfy the required standards and that suitable internal noise levels can still be achieved at all times.

Viability Appraisal

- 9.41 An assessment of the viability of the scheme and confirmation of the developer contributions to affordable homes has been carried out by Altair. Tower Hamlets requires that all qualifying new developments deliver the Council's strategic target to achieve 35% to 50% affordable homes on-site subject to viability in a ratio of 70:30 between affordable rented and intermediate housing.
- 9.42 This viability assessment for the scheme robustly evidences that it is not viable for them to meet either of these strategic targets (i.e. affordable housing quantum or tenure mix).
- 9.43 In performing the assessment, the applicant has ensured that all of the assumptions are robust by either benchmarking them against market advice or industry standards and has sought the input of relevant professionals where required.
- 9.44 Despite the challenging viability on a significantly constrained site, Poplar HARCA have sought to optimise the scheme as far as possible to enable affordable housing to be provided. They have therefore taken a commercial view based on their on-going commitment to deliver regeneration in the local area as a locally based affordable housing provider, to propose 35.6% affordable housing on the scheme, equating to 7 affordable homes including 4 homes for London Affordable Rent and 3 homes for Shared Ownership.

Impact conclusion

- 9.45 All aspects of the proposed scheme have been thoroughly tested and the outcomes, including any necessary mitigation is presented in the suite of documents submitted in support of this application. Overall, the scheme proposal presents a positive outcome that will not harm any interests of acknowledged importance.

10 | conclusion

- 10.1 The scheme proposes the appropriate, sensitive and sustainable redevelopment of a key site allocation within the Council's Local Plan, and a designated regeneration area. The development will create new homes, 35.6% of which will be affordable and will help the local authority achieve both its London Plan housing targets and its Local Plan targets for affordable housing.
- 10.2 The scheme will also retain and enhance a workspace cluster specialising in supporting small and medium sized enterprises by replacing the business floorspace currently provided by the 'RedBox' temporary container building.
- 10.3 In line with the NPPF, the application proposes development on '*brownfield*' previously developed land in an area with TfL 'Good' public transport availability. The development in terms of location is highly sustainable.
- 10.4 The standard of design is high and has been researched and developed with the Council's design officers and with Historic England. The scheme will incorporate and enhance the protection of the existing listed buildings on the site and will enhance the Limehouse Cut Conservation Area.
- 10.5 The new housing will be of good quality; meeting residential space standards and providing good interior natural light. Private amenity space, communal amenity space and child play space will achieve the appropriate standards.
- 10.6 Given the accessible location, and the car-free nature of the scheme, the proposal will have no detrimental impact on the local highway network or on surrounding streets. Cycle parking standards will be met, and there will be no material impact on public transport capacity.
- 10.7 The proposal will optimise the development potential of the site. The new buildings will accord with their context and not encroach on any sensitive view. The use of materials will respond well to the local context and complement the Listed buildings.
- 10.8 Detailed assessments of all relevant technical issues have been undertaken and demonstrate that the development will be able to perform to a high standard. There will be no loss of amenity to occupiers of surrounding properties.
- 10.9 The application is consistent with the development plan for the area and the NPPF. No material considerations suggest that planning permission should be withheld. Indeed, all material considerations reinforce the justification for planning permission.
- 10.10 For these reasons, Poplar HARCA requests that planning permission is granted.