

# CANAL CLUB COMMUNITY CENTRE, WATERLOO GARDENS, TOWER HAMLETS E2 9HP

PLANNING ADDENDUM  
MIXED-USE REDEVELOPMENT



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## 1.0 INTRODUCTION

- 1.1 This Planning Addendum has been prepared on behalf of the London Borough of Tower Hamlets (**the Applicants**), in support of their application for the comprehensive redevelopment of The Canal Club, Waterloo Gardens, Tower Hamlets E2 9HP (**the Site**).
- 1.2 The Site is located at the intersection of Sewardstone Road and Waterloo Gardens. The Site is bounded to the north by the Regents Canal/Victoria Park and residential uses to all other boundaries. The Site is currently used as a community facility and includes a nursery known as Scallywags, a community garden, children's playground and an outdoor ball court.



SITE CONTEXT PLAN

- 1.3 Planning application PA/20/00516, validated 18<sup>th</sup> March 2020, seeks to redevelop the Site, centred around the creation of a new and improved community building over two floors, comprising Scallywags nursery at ground floor and additional community floorspace at first floor. The redevelopment of the Site will also include the re-provision of the ball court, the community garden, together with additional play spaces, a community orchard, a new civic square, and a new secured public canalside walkway.



CGI OF PROPOSED DEVELOPMENT

- 1.4 Through more effective use of the 0.27ha Site, the Applicants also seek to provide self-contained flats, all in affordable tenure. The units will be accommodated in 2, four-storey buildings, situated along the north/north-western boundaries of the Site.
- 1.5 The development is proposed to be delivered as car free, secured by legal agreement, with 1 x disabled parking bay as the only exception.
- 1.6 The application has been subject to statutory consultation and since its submission it has raised several matters that have required further discussion and consideration. Accordingly, this Planning Addendum has consolidated the statutory consultation responses, together with the Applicant’s responses. **As part of the various updates and revisions to the development, as set out herein, it should be noted that the residential element of the proposals has reduced from 14 units to 13 units.**
- 1.7 As part of the responses, the Applicants submit updated and additional supporting information herewith. Where relevant, the supporting information is highlighted in the text of this report for clarity. It has also been necessary to revise some of the original submitted drawings to accommodate the comments raised. We submit them herewith, and provide an updated drawing schedule for reference, extract below.

ArchitectureDoingPlace		DRAWING REGISTER + RECORD											
71-75 Shelton Street, London, WC2H 9JQ													
JOB NO: A0030	JOB NAME: Waterloo Gardens Redevelopment												
SHEET NO: 1	ISSUE CODE:-	CODE	P	P	P	P	P	P	P	P	P	P	P
	I FOR INFORMATION ONLY												
	T TENDER DOCUMENT	DAY	27	19	22	30	28	22	24	29	18	27	
	C CONSTRUCTION ISSUE	MONTH	02	09	10	10	01	02	09	04	05	10	
	R RECORD COPY	YEAR	20	20	20	20	21	21	21	21	21	21	
	P PLANNING												
	D DRAFT												
DRAWING NO	TITLE	SCALE	SIZE	Rev	Rev	Rev	Rev	Rev	Rev	Rev	Rev	Rev	Rev
A0030 001	Existing Site Plan	1:500/1:250	A1	U	E					E			E
A0030 002	Proposed Site Layout Plan	1:200	A1	A						B			B
A0030 003	Redline Context Plan	1:500	A1	/	/					/			/
A0030 004	Development Footprint	1:500	A1	/	/					/			A
A0030 005	Proposed Community Garden Redline Boundary	1:200	A1	/	/					/			B
A0030 006	Existing Community Garden Plan	1:50	A1	/	/					/			/
A0030 020	Existing South Elevation	1:100	A1	/	/					/			/
A0030 021	Existing North Elevation	1:100	A1	/	/					/			/
A0030 022	Existing East Elevation	1:100	A1	/	/					/			/
A0030 023	Existing West Elevation	1:100	A1	/	/					/			/
A0030 100	Proposed Ground Floor Plan	1:100	A1	D	E		F	F	G		H	H	
A0030 101	Proposed 1st Floor Plan	1:100	A1	D	E		F	F	G		H	H	
A0030 102	Proposed 2nd Floor Plan	1:100	A1	D	E		F	F	G		H	H	
A0030 103	Proposed 3rd Floor Plan	1:100	A1	D	E		F	F	G		H	H	
A0030 104	Proposed Roof Plan	1:100	A1	D	E		F	F	G		G	G	
A0030 150	Typical 1 Bed 2 Person Flat Plan	1:50	A1	/	/								
A0030 151	Wheelchair 1 Bed 2 Person Unit Plan	1:50	A1	/	/					A			B
A0030 155	Typical 2 Bed 3 Person Flat Plan	1:50	A1	/	/					A			B
A0030 160	Typical 3 Bed 4 Person Flat Plan	1:50	A1	/	/					A			B
A0030 165	Typical 4 Bed 6 Person Flat Plan	1:50	A1	/	/					A			B
A0030 200	Proposed Context Elevations	1:200	A1	/	/				B	C		D	E
A0030 220	Proposed South Elevation	1:100	A1	/	/	A			B	C	D	D	E
A0030 221	Proposed North Elevation	1:100	A1	/	/	A			B	C	D	E	F
A0030 222	Proposed East Elevation	1:100	A1	/	/				A	B	C	C	D
A0030 223	Proposed Block A1 West Elevation	1:100	A1	/	/				B	C	D	D	E
A0030 224	Proposed Block A2 West Elevation	1:100	A1	/	/				A	B	C	D	E
A0030 225	Proposed Block A1 East Elevation	1:100	A1	/	/					/	A	B	
A0030 250	Proposed Detailed Elevation 1 & 2	1:50	A1	/	/					/			A
A0030 251	Proposed Detailed Elevation 3 & 4	1:50	A1	/	/					/			A
A0030 252	Proposed Detailed Elevation 5 & 6	1:50	A1	/	/					/			-
A0030 300	Proposed Section AA	1:50	A1	/	/					A			A
A0030 303	Proposed Section DD (1 of 2)	1:50	A1	/	/					A			A
A0030 304	Proposed Section DD (2 of 2)	1:50	A1	/	/					A			A
A0030 305	Proposed Context Section DD	1:75	A1	/	/					A			A
A0030 400	Communal Cycle Storage Plans		A1	/	/					A			
A0030 1000	Proposed Visualisation View 1		NTS	A1	/	/				A			B
A0030 1001	Proposed Visualisation View 2		NTS	A1	/	/				A			B
A0030 1002	Proposed Visualisation View 3		NTS	A1	/	/				A			B
A0030 1003	Proposed Visualisation View 4		NTS	A1	/	/				A			B
A0030 1004	Proposed Visualisation View 5		NTS	A1	/	/				A			B
A0030 SK 002	Proposed Belmont Wharf Arrangements	Various	A1	/	/				/				

REVISED SCHEDULE OF DRAWINGS

## 2.0 LBTH BIODIVERSITY

*LBTH officers note that the Regent's Canal, part of a Site of Metropolitan Importance for Nature Conservation, is directly adjacent to the application site. Furthermore, it has been clarified that the existing Canal Club Community Garden (between the play area and the canal) also contains a small pond which supports the potential for breeding amphibians, including common frog, common toad and smooth newt. Ponds are a priority habitat under the Local Biodiversity Action Plan (LBAP). The area also contains a high diversity of nectar-rich flowers of value to invertebrates. House sparrows nest in the community garden in nest boxes provided for them. The site is also used for environmental education with local schools. Therefore, while not of significant value in a wider context, the community garden is of local ecological value in an inner urban context.*

*Officers further acknowledge that the PEA and Bat Roost Potential Survey found that the existing building has low potential for bat roosts, but recommends a single emergence survey, which should be undertaken prior to determination of the application. However, as potential was found only for low value roosts, officers stated that they might be prepared to condition the emergence survey, especially as the coronavirus restrictions are likely to delay it further.*

*Finally, officers advise that it is not clear from the plans whether the existing community garden is to be retained, or whether it is proposed to be replaced with a new community garden. The loss of the pond would be a negative contribution to a LBAP target. With regard to any external lighting, officers advise that this should be low-level and directional to minimise light spill onto the canal. If any existing light spill can be reduced, that would be a biodiversity benefit.*

- 2.1 Please find attached an **updated Preliminary Ecological Assessment**. The assessment has also incorporated GiGL data, as requested. Furthermore, please see enclosed a **Bat Emergence and Re-Entry Survey**, which confirms that no bats were seen emerging from or re-entering the building during the survey. The Applicants also provide an **Ecological Mitigation Plan**.
- 2.2 It is confirmed that the existing community garden is to be relocated, and it will be re-provided to an appropriate standard to avoid potential harm to ecology/biodiversity. Furthermore, as identified by officers, there are opportunities with amendments to increase the biodiversity value of the landscaping. Please see enclosed **updated landscaping plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report)**.
- The landscaping includes a small community orchard, with meadow beneath the fruit trees. This will contribute to a LBAP target, as orchard is a priority habitat.
  - Other features in the ground level landscaping that would contribute to LBAP objectives include a fairly good diversity of nectar-rich flowers in the rain gardens and ornamental boundary planting, and climbers which, if allowed to grow dense, will provide nest sites for sparrows and other birds.
  - The proposed hornbeam hedge is to be replaced by a mixed native hedge (a priority habitat), that would contribute to a LBAP target.
  - The proposed new trees (mostly currently non-native), can also be replaced with native species, this would contribute to a LBAP objective.
- 2.3 In addition to the above, the proposals show green roofs on most of the roof area of the new buildings, in some places combined with photovoltaics. It is confirmed that the green roofs are 'biodiverse roofs', with a substrate depth of at least 80mm, sparsely sown and/or plug-planted with wildflowers. Away from the PVs, the substrate depth will vary up to 120mm to create a varied microtopography, and features such as piles of stones or logs can be considered.

- 2.4 Other features such as bat boxes and nest boxes for house sparrows, and perhaps for swifts and house martins can be incorporated, either built into the fabric of the new buildings, or attached to them. The applicants are happy to accept a condition to secure these matters.
- 2.5 In summary, the green roofs are biodiverse roofs, and all other suggestions by officers have been taken on board, resulting in a net gain and the requirements of D.ES3 are met.
- 2.6 Officers advise that the biodiversity mitigation and enhancements should be secured through a condition along the lines of the following:

*Biodiversity mitigation and enhancement*

*Prior to the commencement of above-ground works, full details of biodiversity mitigation and enhancements shall be submitted to and approved in writing by the local planning authority. The biodiversity enhancements shall include but not be limited to the following:*

- *biodiverse roofs following the best practice guidance published by Buglife – details provided should include the location and total area of biodiverse roofs, substrate depth and type, planting including any vegetated mat or blanket (though sedum mats should be avoided) and any additional habitats to be provided such as piles of stones or logs;*
- *an orchard as shown on the landscape plan – details to include the area of the orchard;*
- *a mixed native hedge – details to include location and length of hedge and planting specification;*
- *landscaping to include a good diversity of nectar-rich plants to provide food for bumblebees and other pollinators for as much of the year as possible, and climbing plants on appropriate walls, as indicated in the landscape plan;*
- *external lighting designed to minimise light spill onto areas likely to be used by foraging bats, particularly the canal – details to include diagrams of existing and proposed light levels across the site and adjacent canal;*
- *bat boxes and nest boxes for appropriate bird species including house sparrow – details should include number, locations and type of boxes.*

*The agreed measures shall be implemented in full prior to the occupation of the development hereby approved. Reason: To increase the biodiversity of the site and to comply with Policy D.ES3 of the Tower Hamlets Local Plan*

- 2.7 The Applicants confirm their agreement to the above worded condition.

### 3.0 LBTH AIR QUALITY

*LBTH officers have sought clarification with specific regard to whether the community centre will have cooking facilities (a kitchen which requires mechanical ventilation).*

- 3.1 It is confirmed there will not be a kitchen for commercial cooking.
- 3.2 Subject to the above, officers have confirmed that they have no objection to the proposal subject to below condition being attached to any planning permission granted.

#### Construction Environmental Management & Logistics Plan

*No development shall take place, including any works of demolition, until a Construction Environmental Management & Logistics Plan have been submitted to and approved in writing by the Local Planning Authority.*

*The plans shall aim to minimise the amenity, environmental and road network impacts of the demolition and construction activities and include the details of:*

- a. *Telephone, email and postal address of the site manager and details of complaints procedures for members of the public;*
- b. *Dust Management Strategy to minimise the emission of dust and dirt during construction including but not restricted to spraying of materials with water, wheel washing facilities, street cleaning and monitoring of dust emissions;*
- c. *Measures to maintain the site in a tidy condition in terms of disposal/storage of waste and storage of construction plant and materials;*
- d. *Scheme for recycling/disposition of waste resulting from demolition and construction works;*
- e. *Ingress and egress to and from the site for vehicles;*
- f. *Proposed numbers and timing of vehicle movements through the day and the proposed access routes, delivery scheduling, use of holding areas, logistics and consolidation centres;*
- g. *Parking of vehicles for site operatives and visitors;*
- h. *Travel Plan for construction workers;*
- i. *Location and size of site offices, welfare and toilet facilities;*
- j. *Erection and maintenance of security hoardings including decorative displays and facilities for public viewing;*
- k. *Measures to ensure that pedestrian access past the site is safe and not obstructed;*
- l. *Measures to minimise risks to pedestrians and cyclists, including but not restricted to accreditation of the Fleet Operator Recognition Scheme (FORS) and use of banksmen for supervision of vehicular ingress and egress.*

*The development shall not be carried out other than in accordance with the approved details.*

*Reason: In the interests of highway and pedestrian safety and to preserve the amenity of the area in accordance with the requirements of Tower Hamlets Core Strategy policy SP09 and SP10.*

#### Air Quality Standards for Boilers and CHP Units

- a) *Any gas-fired boilers installed within the development shall not exceed the maximum emission standard of <40mgNO<sub>x</sub>/kWh.*
- b) *Any gas-fired CHP plant installed within the development shall not exceed the maximum emissions standards:*
  - *Spark ignition engine: <250mgNO<sub>x</sub>/Nm<sup>3</sup>*
  - *Compression ignition engine: <400mgNO<sub>x</sub>/Nm<sup>3</sup>*
  - *Gas turbine: <50mgNO<sub>x</sub>/Nm<sup>3</sup>*

*The boilers and plant shall be maintained so as not to exceed the relevant standards for the lifetime of the development.*



*Reason: To minimise the adverse air quality impacts of the development, in accordance with policies 7.14 of the London Plan (2016), SP03 of the Core Strategy (2010) and DM9 of the Managing Development Document (2013)*

3.3 The Applicants are happy to accept the above suggested conditions.

#### 4.0 LBTH DESIGN AND CONSERVATION

4.1 Officers have provided several detailed points which are summarised below:

- **Height** – *The application includes 2no. four storey buildings and a two-storey building. In this location buildings heights range between two to five storeys in height, therefore in this respect the proposed heights are in keeping with the surrounding context.*

4.2 Noted. No change required.

- **Site & general layout** – *Whilst it is important to acknowledge improvements to the layout since the initial scheme, there are issues with the proposed layout. Whilst it is understood the applicant has a number of conflicting demands that needs to be balanced, there are issues with the layout that will need to be resolved. These area as follows:*

- **Block A1 (relationship to the Canal)** – *The existing building has a height of two storeys, and a setback of approximately 7 metres from the edge of the canal. By contrast, the proposed building is twice the height of the existing building and will be located closer and, in the case of Block A1 on the edge of the canal. Issues with this relationship were raised early in the pre-application process, and the applicant advised to move the building back from the edge of the canal.*

4.3 Prior to the submission of the planning application, the Applicants considered the positions of the buildings at length. At the final pre-app meeting with officers (January 2020), prior to the submission of the application, officers advised the following in written pre-app advice dated 16/01/2020, that;

*‘On balance the scheme has responded positively to previous pre-application advice, with the proposed design changes considered compatible with the broader surrounding in their bulk, mass, materials and design principles. While greater details are required as stated above, officers consider the fundamental design ethos of the scheme to be sound’.*

4.4 Furthermore, due to the number of contrasting and conflicting demands from the development, it was not possible to move the whole buildings, particularly block A1, any further back from the Canal edge.

4.5 Notwithstanding the above, to alleviate the concern, the architects have elected to remove the previous stair core to block A1 entirely. Its removal has allowed a setback relationship of the massing from the canal embankment and Belmont Wharf. However, it should be noted that the removal of the core has affected the access arrangements to this block, ultimately reducing the overall unit provision to 13. The internal alterations/change of mix is discussed later in this Addendum.

- **Block A2** – *In terms of its impact on the canal, Block B is less problematic. Nevertheless, there elements relating to this block that needs refining, the most notable is the projecting section/bay to the north of the building. Here the building alignment narrows the towpath, and removes the opportunity for defensible space to be incorporated, consequently resulting in a loss of privacy to the ground floor units. In locations where defensible space have been provided, the landscape design creates routes that direct pedestrians close to habitable rooms with very narrow and in some instance ineffectual defensible spaces. This also creates privacy issues, which needs to be addressed.*

*The layout also creates potential overlooking issues between winter gardens, draft lobbies and habitable rooms in different units. Examples can be seen between units A2/1, A2/2 & A2/1, and A2/7. These issues could be addressed with minor changes to materials or the location of glazed elements.*

4.6 Block A2 cannot be moved further back from the Canal for many of the same reasons as Block A1. Furthermore, its re-sitting would also adversely impact the provision of the community building.

4.7 The provision of the projecting bay is to improve surveillance to reduce potential for anti-social behaviour and improve privacy acting as an oriel window.

- 4.1 With regard to the landscape design, the Applicants have taken this on board and further improvements/defensible landscaping is proposed. Please see enclosed **updated landscaping plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).**

*- **General issues with the ground floor layout** – Generally, at ground floor both blocks have issues relating to privacy. As mentioned above, many of issues with the layout are exacerbated by a landscape design that places pedestrian routes within close proximity to habitable rooms. To address this, a number of steps need to be taken, the first being redesigning the landscaping; this will include reconsidering the location of paths, greenspaces and relocating play equipment away from bedroom windows. The second step is to increase the size of defensible spaces around units and to remove awkward narrow and ineffective defensible spaces on the corners of buildings. Officers have also raised concern with disparity between the gated nature of the community garden, and the more open and welcoming community garden.*

- 4.2 As above, the landscape design has been updated, to enable issues relating to the provision of defensible space to be addressed. See enclosed **updated landscape drawings plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).**

- 4.8 The inclusion of gated areas is retained to ensure that persons can identify what areas are public or private. Officers have suggested that a possible solution could be to consolidate the community orchard and garden in order to make it easier to coordinate maintenance and help ensure both spaces are utilised. However, this is simply not possible due to local representation that the community garden should be retained in broadly the same position it is today. This raises security concerns given its set back location, and therefore must be provided with some level of security, hence the provision and retention of some gated accesses.

*Officers suggest that the play space has a poor layout. The ball court has been setback from the street and from the adjacent property at No176 Sewardstone Road. Whilst this enables the orchard to be incorporated there is concern, the recessed area to the front of the ball court could attract antisocial behaviour during the evenings when the community centre is closed.*

- 4.9 The above is contrary to pre-application advice which stated that;

*Changes have been made to the public realm following previous pre-application advice. The rationalisation of the relationship between communal and public areas is welcomed, with a moderate delineation between these spaces encouraged. The introduction of a new community garden to the Sewardstone Road frontage abutting the MUGA is welcomed. As discussed, this would serve to enhance the public space offering of the site and would provide the community with a genuinely accessible community garden. Consideration should be given to enhancing the existing "community garden" adjacent to Belmont Wharf to more appropriately reflect its function as an amenity space for the permanent houseboat moorings. The interface between the community block and the MUGA is considered to be improved and would aid in directing pedestrian traffic through the heart of the development. The boundary treatment to this will need to ensure it strikes a balance between being a defensible space and not creating a hostile interface to the development.*

- 4.10 Given the sensitivities of the Site and contrasting requirements from both a local and policy perspective, it is considered that the layout should be supported.

***Community building** – This building provides a layout that enables it to successfully integrate within the existing public realm and townscape, therefore the proposed layout is supported.*

- 4.11 Noted, no changes required

***Impact on Canal and existing residential moorings)** – A lot of work has been done to achieve a layout that works for existing occupiers; however, the proposed layout does not fully resolve the impact on*

*the Regent's Canal and the existing residential moorings. The position of Block A2, which has been set back from the canal edge, provides separation between the canal and the moorings and allows the opportunity to reinstate access to the towpath in a way, which the layout of block A1 does not.*

- 4.12 The architects have removed the previous stair core to block A1 entirely. This had previously interfaced with the existing canal wall. Its removal has allowed a setback relationship of the massing from the canal embankment and Belmont Wharf. Removing the stair core has affected access to the 1 bed units previously entered at 2nd and 3rd floors, and at roof level. Accordingly, a new family-sized maisonette is provided instead, entered by deck access at 1st floor level from the canal side. This reconfiguration of units has resolved the vertical access issue, though **has resulted in the reduction of the scheme to 13 units overall**. See updated drawings – **A0030-100H, A0030-101H, A0030-102H, A0030-103H, A0030-104G, and A0030-221F**.

***Design** – Officers state that the proposal incorporates some distinctive and playful design elements that create visual interest. There are issues with the overall design that need to be resolved with this in mind the following comments have been made:*

***Community/nursery building** – Of the buildings on site, the community building is the most successful building within the scheme. Although the materiality is generally supported, due to its long-term appearance when weathered and the level of maintenance needed there is concern about the use of timber. We would encourage the applicant to reconsider its use. If the applicant still proposes to use timber, careful thought is needed about the type of timber to be used, the type of finish i.e. treatment and stains, and what maintenance schedule would be needed to ensure the aesthetic and physical quality of timber could, in the long term be retained.*

- 4.13 The Applicants are happy to accept a planning condition relating to materials.

***Blocks A1 & A2** – This building contains some interesting design elements such as the contemporary chimneys and interesting choice of materials such as the pleated glazed bricks, however; the overall design appears unresolved and design detailing inconsistently applied. The building lacks a cohesive approach to the fenestration design. This has resulted in a lack of consistency in the window design and alignment. Whilst in some instances, smaller windows are necessary; in most cases, the size of windows or openings can be increased. This would improve the solid to glazed ratio, thereby giving the building a much lighter appearance.*

- 4.14 The fenestration has been revised to become regularised and aligned, in line with officer comments. Further detail is set out in the accompanying DAS. Both the changes to fenestration and the reduction to block A1 are highlighted in the CGI extracts below. **See updated elevation drawings – A0030-220E, A0030-221F, A0030-222D, A0030-223E, A0030-224E, and A0030-225B**.



PROPOSED VIEW FROM VICTORA PARK AS SUBMITTED (LEFT), AS REVISED (RIGHT)

**Playground Equipment** – *The play equipment for the younger children appears somewhat limited and does not take the opportunity to improve upon the existing offering. Notwithstanding comments regarding the layout (in point 3c above) there is a need for greater clarity about where play equipment will be located.*

- 4.15 As part of the comprehensive hard and soft landscaping scheme for the Site, it is proposed to install brand new play equipment to serve the development and the wider local community. The play equipment will be provided close to its existing position. The proposal aims to incorporate doorstep play into the new landscape. This consists of equipment placed on play surfaces and set within the landscape spaces of the new civic space. In addition, doorstep play is provided for residents in a communal garden. The play equipment is suitable for young children and provides a range of activities.
- 4.16 The highly visible location is passively overlooked by all local flats for security and safety. **See updated landscape drawings plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).**

**Soft Landscaping** – *Notwithstanding comments from the Council's Biodiversity officer, the proposed soft landscaping is supported.*

- 4.17 Support the proposed soft landscaping, no changes required.

**Public realm improvements including hard landscaping** – *We welcome proposals to carry out public realm improvements, however, greater clarity is needed on the detail about surface finishes, i.e. types of paving, unit sizes etc. This could be provided using a detailed hard landscape plan.*

- 4.18 Please see the **updated landscape drawings plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).** prepared by BBUK. The Applicants would welcome a hard landscaping planning condition as part of any forthcoming consent, should this be necessary.

**Street Furniture** – *Proposals for the bench and bins are supported. Although in principle the bollard design is supported, there is concern about the proliferation of bollards and the visual and physical clutter that they cause.*

- 4.19 The above is acknowledged and can be considered as part of a landscaping condition.
- 4.20 In summary, proposals comprise a design-led, mixed-use, infill regeneration of the site. It discusses the site's location in the Victoria Park Conservation Area and the site's abutment of the Canal & Rivers Trust's Regents Canal Conservation Area. The proposals are derived from strong placemaking design intent, while attempting to balance competing interests of the established community and LBTH's commitment to alleviate pressing local housing need through careful development of its assets.
- 4.21 Crucially, the design process involved intensive and delicate community/stakeholder engagement by the design team. This comprised 19 individual stakeholder consultation contact points over 2 years, up to January 2020.

## 5.0 LBTH CONTAMINATED LAND

5.1 Officers have raised no objection to contaminated land matters subject to the following conditions.

*Development of the site shall not begin until a scheme has been submitted to the local planning authority and written approval has been granted for the scheme. The scheme will identify the extent of the contamination and the measures to be taken to avoid risk to the public, buildings and environment when the site is developed. Details of the scheme should include:*

- i. A 'desk study report' documenting the history of the site.*
- ii. A proposal to undertake an intrusive investigation at the site based on the findings of the desk study.*
- iii. A 'site investigation report' to investigate and identify potential contamination.*
- iv. A risk assessment of the site.*
- v. Proposals for any necessary remedial works to contain treat or remove any contamination.*

*Occupation of the building/dwelling hereby approved shall not begin until:*

- i. The remediation works approved by the local planning authority as part of the remediation strategy have been carried out in full. If during the remediation or development work new areas of contamination are encountered, which have not been previously identified, then the additional contamination should be fully assessed in accordance with condition [1(iii-iv)] above and an adequate remediation scheme shall be submitted to and approved in writing by the local planning authority and fully implemented thereafter.*
- ii. A verification report, produced on completion of the remediation works to demonstrate effective implementation of the remediation strategy, has been submitted to and approved in writing by the local planning authority. The content of the report must comply with best practice guidance and should include, details of the remediation works carried out, results of verification sampling, testing and monitoring and all waste management documentation showing the classification of waste, its treatment, movement and/or disposal in order to demonstrate compliance with the approved remediation strategy.*

*Reason:*

*To make sure that contaminated land is properly treated and made safe before development, to protect public health and to meet the requirements of The NPPF, Policies 5.21 and 5.22 in the London Plan (as amended) and Policy D.ES8 in the LBTH Managing Growth and Sharing Benefits document (2031), which provides guidance around protecting residents' health and the environment from contaminants and hazardous substances.*

5.2 The Applicants accept the above conditions.

## 6.0 LBTH POLICY

6.1 Officers have sought the following clarifications.

*It is noted, that as a floorspace comparison, the new community centre is less than the existing. The application states a) the only users of the community centre are Scallywags nursery, b) Scallywags nursery is returning and the design and layout reflects their particular needs These two points should be confirmed. There does not appear to be any comment on the application from the nursery. Given the overall provision of this proposal, the floorspace reduction may be acceptable, subject to being satisfied that the proposed nursery meets the specifications for the nursery provider. The first floor space would be a useful space for other meetings.*

6.2 We confirm that Scallywags nursery will be returning to the premises. We have requested Scallywags to write to the LPA directly to corroborate.

*The re-provision of the multi-use games areas is supported. This appears to provide a much needed improvement to the quality of the existing space, with new goals and basketball hoops, while maintaining the size of the space.*

6.3 The above is acknowledged. No revisions required.

*It is understood that the existing community garden is inaccessible for most of the week. Open to the public on Tuesdays. This should be confirmed. It is not clear from the application documents, the location or planting strategy, community ownership for the new garden. It is recommended that this is confirmed.*

6.4 In line with pre-application representations, the existing Community Garden (196m<sup>2</sup>) is retained in the north-east corner of the site, adjacent to the canal and the moorings which is predominantly serves. The proposed Community Garden comprises 102m<sup>2</sup>.

6.5 The Tower Hamlets Arts website confirms that the Community Garden is only open to the public every Tuesday from 2pm, during the growing season. However, under the proposed development, it is sought to encourage a greater degree of public access. The Applicants welcome a planning condition which requires submission of a management/access plan, prior to the Community Garden coming back into operation, to ensure that it delivers genuine wider community benefit. In line with Local Plan Policy D.OWS3, the re-provision and enhancement of the Community Garden should be supported.

*The provision of 14 affordable rent homes is supported. It appears the scale of development and pattern of development is similar to the surrounding area, and appropriate in that respect. The proposal appears to have a good mix of unit sizes with 3x 3-bedroom units, and 2 x 4-bedroom units.*

6.6 Acknowledged. No further changes required. However, it should be noted that the scheme has reduced to 13 units overall to accommodate design comments (outlined earlier in this statement). The final mix now comprises 3 x 1b, 4 x 2b, 3 x 3b and 3 x 4b units.

*The application documents show a scheme that looks attractive, safe and interesting. In terms of the material treatments, it is noted that the renderings are labelled as 'artists impression'. It is considered appropriate to have more clarity at this stage regarding the appearance of the proposed development. A key benefit of the scheme is providing access to the canal and making part of Lark Row a shared surface, which is supported. This would be a notable enhancement and improve legibility through the area.*

6.7 Please note that the description of 'artists impression' is used in the same way as 'CGI' or 'photo-visualization'. Whilst the submitted images are not verified views, they are considered to fairly reflect the proposals, the design intent and materiality etc.

## 7.0 LBTH NOISE

7.1 Officers have raised no objection subject to the following conditions.

1. *Prior to commencement of construction works above ground, full details of a scheme of sound insulation for the residential units shall be submitted to and approved in writing by the Local Planning Authority. The submitted details are required to demonstrate how the external building fabric has been designed to achieve the following internal criteria with windows closed:*

- *Living Rooms 35 dB LAeq,16hr (between 07:00 and 23:00 hrs)*
- *Bedrooms 30 dB LAeq,8hr (between 23:00 and 07:00 hrs)*
- *Bedroom 45 dB LAFmax to be exceeded no more than 15 times per night-time from sources other than emergency sirens.*

*The scheme shall be fully implemented in accordance with the approved details.*

2. *Noise emitted from any new fixed building services plant and equipment for two-storey community centre comprising nursery and community facility and residential shall be designed to a level at least 10 dB below the lowest representative existing background noise level when assessed in accordance with BS 4142:2014 at a position 1 m from the window of the nearest noise sensitive premises (i.e. Plant LA<sub>r</sub>, Tr = -10 dB LA<sub>90</sub>, T). This criterion applies to the total contribution of noise from all new plant items associated with the Proposed Development that may run during any particular period.*

*I would recommend a restriction of hours of operation for Community Centre so that no machinery or plant shall be operated, no process shall be carried out and no deliveries taken at received or dispatched from the site except between the hours that you as the LPA deem appropriate, taking into account Monday to Saturday and possibly at no time on Sundays, Bank or Public Holidays. This would precaution would protect the amenity of the locality, especially for people living and/or working nearby, in accordance with LBTH planning policy.*

*I have a concern of the potential noise breakout emanating from the community centre. This needs to be clarified by the applicant. I am happy to engage in dialogue with them and their noise consultant to discuss further.*

7.2 The Applicants are happy to accept the above suggested conditions.



**8.0 LBTH PUBLIC HEALTH**

*Officers consider that the rapid HIA submitted within the Planning Statement gives some strong detailed positive statements regarding the impact on health. Overall the scheme will benefit health in view of its affordable housing provision and publicly accessible spaces, and standards applying to the design.*

8.1 Officers have raised no objection.

**9.0 LBTH SUDS**

9.1 Officers have confirmed that they raise no objection subject to the following conditions.

*Prior to the commencement of any superstructure works, a surface water drainage Scheme for the site based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, for the site shall be submitted to and approved by the local Planning Authority*

*The scheme shall also include (but not limited to)*

- *The peak discharge rates and together with associated control structures and their position*
- *Safe management of critical storm water storage up to the 1:100 year event plus climate change and*
- *Details of agreed adoption, monitoring and maintenance of the drainage and suds features.*

*The development shall be carried out strictly in accordance with details so approved.*

9.2 The Applicants agree to the above conditions.

## 10.0 LBTH HOUSING

10.1 Officers have sought the following clarifications;

*Due to the scale of the development and as it is providing a 100% affordable rented scheme, on balance the unit mix is supported. With regard to the rents, can the applicant confirm they're achieving policy by providing 50:50 THLR:LAR split?*

10.2 It is confirmed that the scheme sought to achieve a 50:50 THLR:LAR split. However, following the reduction of 1 unit, to 13 units overall, the proposed split now comprises 7 units as THLR (54%) and 6 units (46%) as LAR.

*With regard to the unit occupancy, please can the applicant confirm the 3B unit (as it stacks) accommodate 3B5P from ground to the upper levels as shown on the second floor as we would prefer to see 3B5P units than 3B4P units.*

10.3 The proposed accommodation has been designed to meet with the conflicting requirements of kitchen & living area of the London Housing Design Guide and the Tower Hamlets Design Guide. Furthermore, having regard to the requested alterations to the massing, in particular block A1, the Applicants confirm that the final unit mix is as follow.

Unit No	Unit Type	Size	Tenure
A1.1	1B2P	62	THLR
A1.2	4B5P	142	THLR
A1.3	1B2P	56	LAR
A1.4	4B5P	124	THLR
A2.1	4B5P	123	LAR
A2.2	3B5P	88	THLR
A2.3	2B3P	64	THLR
A2.4	3B5P	102	THLR
A2.5	2B3P	66	THLR
A2.6	3B5P	102	LAR
A2.7	2B3P	66	LAR
A2.8	1B2P	55	LAR
A2.9	2B3P	63	LAR

### REVISED SCHEDULE OF ACCOMMODATION

*With regard to the wheelchair unit, we would prefer to see more family sized wheelchair units to respond to the Borough's Project 120 demand. We understand the ground floor arrangement is constrained and appreciate the 1B is on a convenient level (avoiding additional lifts etc) however have family sized units been tested as part of the pre-application process?*

10.4 Yes, the Applicants had sought to provide a larger unit as the wheelchair unit within the scheme, however due to the various other site constraints, it has not been possible to incorporate.

*Has the applicant provided 1:50 layouts of the wheelchair unit and liaised with the Borough's Occupational Therapists?*

10.5 We enclose a 1:50 layout of the wheelchair unit, as requested. **See drawing number A0030-151 B.**

*Can the applicant identify the wheelchair charging points, door nib allowances etc*

10.6 The enclosed 1:50 plan identified relevant charging points, door nib allowances etc. Again, **see Drawing number A0030-151B.**

## 11.0 LBTH HIGHWAYS

- 11.1 Highways officers have raised some concerns with the application and seek clarification on the following points.

### *Cycle Parking*

*The applicant has stated in the Transport Statement (TS) that they are proposing cycle storage but Page 25 seems somewhat confused about the numbers of cycle parking stands proposed – it quotes 34 and 35 on the same page and has the visitor parking included within the long stay.*

*The TS Table 6.1 – Cycle Parking Provision shows cycle parking provision for;*  
*1.5 spaces per 2 person 1 bedroom 4 x 2 person, 1 bedroom 6*  
*2 spaces per all other dwellings 5 x2 bedroom 10*  
*2 spaces per all other dwellings 3 x3 bedroom 6*  
*2 spaces per all other dwellings 2 x4 bedroom 4*

*There needs to be 8 for the 4x1 bed flats (the ratio of 1.5 is for studio apartments only).*

*Additionally the residential cycle stores must be housed separately from the cycle stores for the community and nursery uses and the visitor parking.*

*Therefore a minimum of 28 residential long stay cycle parking stands are required alongside 2 residential visitor cycle stands which would be Sheffield stands (or similar).*

*Cycle parking for the nursery element will need to be a minimum of 6 stands (for staff and visitors) and cycle storage for the community use class will need to be included separately.*

- 11.2 We enclose updated plans for all of the cycle storage proposals, confirming dimensions and access to the each of the stores. **See drawing number A0030-400B.** Please also find attached an updated **Transport Statement**, which provides clarifications on the originally submitted Transport Statement. **It should be noted that the mix of the units proposed has been amended following reduction of the scheme to 13 units overall and the relevant cycle parking requirements have been amended to follow.**

### *Accessible Parking*

*The TS states that there is a proposal for one accessible parking bay within the site. This is shown marked out on Page 27 of the Design & Access Statement but there is no detail provided within the TS or the D&A pertaining to how this will be accessed and managed. It is not shown at all on the visualisation (5.6 of the D&A). Full details outlining how this bay will be accessed and protected for blue badge holders is required.*

- 11.3 Please refer to the submitted **Transport Statement** herewith.

### *Servicing and Deliveries*

*The TS has failed to provide any details pertaining to servicing arrangements for the proposed redevelopment*

- 11.4 Please see **Transport Statement** submitted herewith, which now provides the requested servicing arrangement details.

*Pedestrian Access and Safety*

*There are a number of proposed new pedestrian accesses, notably the new access off Lark Road and Stewardstone which is a shared access with cycles and vehicles. How will pedestrian priority and safety be maintained? The visualisation drawings within the D&A shows bollards on the junction of Stewardstone Road and Waterloo Gardens but this detail has been omitted from the Transport Statement. Details outlining ALL new pedestrian, cyclist and vehicles access is required. A detailed plan showing the pedestrian routes to and through the development site is required for assessment.*

- 11.5 Please refer to the **Transport Statement** submitted herewith.

*On Street Parking Losses*

*The Transport Statement concludes "The trips generated by the site can safely be accommodated by the existing pedestrian, cycling, public transport and road infrastructure surrounding the site". This will need to be demonstrated. The TS has failed to acknowledge if there are several existing residential car parking bays which will be lost as a result of this development. Will Lark Row continue as a through road? There is a parking bay on Lark Row, labelled 2A – is this to be retained?*

- 11.6 Please refer to the **Transport Statement** submitted herewith. It is confirmed that Lark Row will continue to be a through road, no alteration is sought in that regard. However, Lark Row is a rat-run and sees vehicles travelling at high speeds. The speed table/ shared surface proposed at this part is sought to benefit the site and wider community, improving highway safety. The applicants have served notice on the owners of Lark Row

*Belmont Wharf*

*There is a proposed access to the North of the site from Belmont Wharf to the – 'Blue Ribbon' / Licenced area and into the communal area and common area. Is there a permitted right of way here? What is the Blue Ribbon / Licenced area in relation to this development site?*

- 11.7 The proposed access points fall under Tower Hamlets ownership.

*Other*

*The Transport Statement has provided no details about the numbers of people who will be using the community centre and/or ball courts/gardens at any one time. In order to assess if there is likely to be any impact on the highway, or to highway users, detailed information is required within the TS outlining the maximum number of visitors at any one time as well as the mode of travel. For example, if there is to be a coach drop off? Will schools or other community clubs visit? What are the proposed opening hours etc...?*

- 11.8 See **Transport Statement** submitted herewith.
- 11.9 Finally, as suggested by officers, the Applicants are happy to accept the following requested conditions;

*All future occupiers will be made exempt from purchasing CPZ permits. This will need to be secured via S106 agreement (or other legal means as determined by the case officer).*

*A condition requiring a Construction management Plan – this will need to be submitted for approval prior to the commencement of ANY works but only once a Principal Contractor has been appointed.*

*A condition requiring a Service and Delivery Management Plan. Whilst outline details are required now a full SMP can be secured via condition.*

*As boundary works are possible (although this will hopefully be clarified within a TS resubmission) a S278 agreement will be required*

## 12.0 LBTH WASTE

12.1 Officers have requested the clarifications on waste storage.

### *Bin Stores*

12.2 It is confirmed that all bin stores are designed in accordance with the latest British Standard BS5906 and Waste management in buildings – Code of practice and Building Regulations 2000, Part H6, ensuring the bin store is large enough to store all containers with at least 150mm distance between each container and that the width of the door is large enough with catches or stays. The bin store are also step free.

### *Waste Capacity*

12.3 The applicant has provided details of total waste capacity required for residential waste within the submitted DAS.

12.4 With regard to commercial waste, a separate bin store is provided. Further details are provided within the DAS.

### *Waste Distance*

12.5 It is confirmed that all residents can access each bin store within 30 meters carrying distance.

### *Waste Collection Service*

12.6 The applicant has provided information where the waste collections vehicle will park to load and unload for each bin store as part of the **Transport Statement**.

### *Dropped Kerb*

12.7 Officers suggest that the applicant is required to provide dropped kerb minimum 1.2 meters wide at the locations of where the waste collection vehicles will service the waste. However, it should be noted that the refuse trucks will access the Site from Lark Row where it is proposed to incorporate a speed table/shared surface. Accordingly, the refuse trucks will be level with the application site, and refuse store areas, therefore negating the need for dropped kerns.

### *Internal Storage*

12.8 It is confirmed that all of the residential units are provided with internal waste storage, within the kitchen units, with the following capacity:

Refuse – 40 litres  
Recycling – 40 litres  
Food waste – 23 litres

### 13.0 THAMES WATER

- 13.1 Thames Water have raised no objections to the proposals subject to the following standard informatives being attached to the decision.

*Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.*

*With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be require.*

*Should you require further information please refer to our website.*

*<https://developers.thameswater.co.uk/Developing-a-largesite/>*

*[Apply-and-pay-for-services/Wastewater-services](https://developers.thameswater.co.uk/Developing-a-largesite/Apply-and-pay-for-services/Wastewater-services)*

*As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't*

*limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.*

*<https://developers.thameswater.co.uk/Developing-a-largesite/>*

*[Planning-your-development/Working-near-or-diverting-our-pipes](https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes).*

*The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within*

*15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line*

*with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.[https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-ordiverting-](https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-ordiverting-our-pipes)*

*our-pipes. Should you require further information please contact Thames Water. Email:*

*[developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer*

*Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB*

#### *Water Comments*

*On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water*

*recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where*

*it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.*

*If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/building water](https://thameswater.co.uk/building-water).*

*There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>*

*The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)*

- 13.2 The Applicants are content with the suggested informatives.



## 14.0 CANALS AND RIVER TRUST

14.1 The main issues relevant to the Trust as statutory consultee on this application are:

### a) The impact of the proposed development on the Conservation Area

- *The proposed architectural expression and forms appear to be quite interesting, and largely appropriate. However, having the western building (Block A1) built directly off the canal wall, at 4-storeys tall, will dramatically change the feel of the area, especially in this location where the offside (non-towpath side of the canal) opens up from the dense waterside development of Vyner Street, and where the existing properties on Lark Row and Sewardstone Road are set back some distance from the canal. The 4 storeys proposed reaches something of a balance between the 3-storey development facing the canal on Lark Row and the slightly older development to the rear (Colville and Halkett House) which are 5-storeys. However, like this existing form, the proposed development might benefit if it were to step up in height further from the canal, with the elements closest being limited to 3-storey considering the proximity to the water, and the moorings.*
- *It is unfortunate that the vista between the buildings is somewhat dominated by the cycle hoops and play equipment.*
- *The hard landscaping materials adjacent to the canal appear to be of high quality, as do the building materials themselves, with elevations that are interesting and generally well detailed.*

14.2 The Applicants are pleased to read that the architectural expression and forms of the proposed building are interesting and deemed to be largely appropriate. Regarding the proximity of the buildings to the Canal, it has already been stated within this document, the numerous reasons why the buildings cannot be moved further away from the Canal.

14.3 It should be noted that whilst the representations state that the building is 4 storeys tall directly, it should be acknowledged that the principal shoulder height of the building is only 3 storeys. The top floor is set back significantly. From the Canal, users of the Canal immediately below will only read the proposed buildings as 3 storeys. The set-back top floor will only be read from longer views, i.e. from Victoria Park.

14.4 With regard to the vista between the buildings, this will largely serve an area of open landscaped amenity space. Cycle parking and play equipment is fairly limited in this location.

14.5 Finally, with regard to hard landscaping, it is noted that the high-quality design and materials are acknowledged.

### b) The impact on the structural integrity of the canal wall and subsequently, Conservation Area

- *It is typically not advisable to develop right up to the canal edge due to the complex foundation interaction of the building and the canal wall. Setting the building back might be more appropriate.*
- *A significant waterway wall survey be provided in advance of determination of the planning application, as well as full proposed foundation details, with cross section for 'Block A1', to enable full assessment of potential structural implications to the existing waterway wall. The survey should provide details of the current condition of the waterway wall, with details of any defects discovered, and of the proposed remediation works (including materials proposed, to ensure that the impact on these important features within the Regent s Canal Conservation Area is minimised).*

14.6 The Applicants have endeavoured to carry out a detailed canal wall survey and have been liaising with C+RT with regards to the appropriate licences etc. Due to issues relating to access, we suggest that the survey be secured by way of a planning condition, requiring the Applicants to undertake the survey prior to the commencement of development. The results of this survey will be submitted to the Council and approved, prior to works commencing. The Applicants are happy to accept a separate condition for

details of an impact assessment for the expected vibrations and excavations due to the foundation construction, as well as a demolition plan to be agreed with the Trust, to mitigate impacts of the demolition works (vibrations and dust/debris) on the canal environment and boaters.

- 14.7 It should be further noted that due to the alterations to block A1, removing the core on the canalside has alleviated direct impact on the canal wall. Both of the proposed residential buildings sit well back from the canalside.

#### **c) The impact on overshadowing of the adjacent moorings, the Regents Canal and its ecology**

*The boats at Belmont Wharf (E2 Collective) are registered as residential moorings, having received planning consent in 2007. Yet the daylight and sunlight assessment does not consider them for the purposes of assessing the overshadowing impact of the development.*

- 14.8 We enclose **updated Daylight/Sunlight Assessments** which have taken account of the adjacent moorings. The report confirms compliance. The updated reports also include details of overshadowing. Whilst the removal of the core to block A1 was not as result of daylight/sunlight concerns, the revised massing is nonetheless reflected within the results of the updated assessments.
- 14.9 With regard to ecology, as set out at section 2 of this addendum, the proposals incorporate a number of measures that will improve ecology/biodiversity.
- 14.10 Should it be required, the Applicants would consider a condition/ S106 requirement to provide floating ecosystems within the canal at appropriate locations (as agreed with the Trust), to mitigate any further potential impact on ecology within the waterway.
- 14.11 It is confirmed that the existing community garden is proposed to be relocated, and this would be re-provided to an appropriate standard, noting that it represents an important biodiversity site

#### **d) The impact on privacy and security of the adjacent moorings**

*The impact on privacy and security of the adjacent moorings (Belmont Wharf) The proposals include a secured public canalside walkway for residents to access and sit alongside the Regent s Canal. However, there does not appear to be any screening between this area and the residential moorings on Belmont Wharf, and a loss of privacy and amenity seems highly likely. We have requested a condition, below, requiring further details of how the privacy and security of the moorings is to be managed.*

- 14.12 The Applicants are happy to accept this condition.

*We also have reservations about the stairwell/lift lobby (common area) in Block A1 being proposed immediately adjacent to the canal with openings looking directly onto the moorings beneath, and making them vulnerable to things being dropped from this public area, as well as exacerbating a loss of privacy.*

- 14.13 The architects have removed the stair core to block A1 entirely. This had previously interfaced with the existing canal wall. Its removal has allowed a setback relationship of the massing from the canal embankment and Belmont Wharf. Removing the stair core has affected access to the 1 bed units previously entered at 2nd and 3rd floors, and at roof level. Accordingly, a new family-sized maisonette is provided instead, entered by deck access at 1st floor level from the canal side. This reconfiguration of units has resolved the vertical access issue, though has resulted in the reduction of the scheme to 13 units overall. The removal of the core is considered to address the concerns relating to privacy.

#### **e) The impact on surface water drainage**

*We note the reference in the application to discharging surface water discharge to the canal. This may be acceptable subject to the following conditions and informative:*

*Conditions Risk assessment and method statement - Prior to the commencement of the development hereby permitted, full details of a Risk Assessment and Method Statement (RAMS) shall be submitted to and approved in writing by the Local Planning Authority for all activities which have a potential to impact the integrity of the Regent's Canal or any of its associated infrastructure, including details of the scaffold design, and measures in place to mitigate contamination/collapse near the canal. These details shall include a program of implementation in accordance with the Canal & River Trust Code of Practice for Third Party Works. The works on site shall be carried out in accordance with the approved details.*

*Reason: To ensure, prior to any works taking place, the proposed construction works do not have any adverse impact on the safety and amenity of waterway users and the integrity of the Regent's Canal.*

*Vibrations and excavations Prior to the commencement of the development hereby permitted, full details of an impact assessment for the expected vibrations and excavations due to the foundation construction, as well as a demolition plan shall be submitted to and agreed in writing by the Local Planning Authority, to mitigate impacts of the demolition works (vibrations and dust/debris) on the canal environment and boaters.*

*Reason: To ensure, prior to any works taking place, the proposed construction works do not have any adverse impact on the safety and amenity of waterway users and the integrity of the Regent's Canal. Privacy and security of adjacent moorings*

*Prior to the commencement of the development hereby permitted, details of measures to ensure the continued privacy, security and enjoyment of the adjacent residential moorings shall be submitted to and approved in writing by the Local Planning Authority, and implemented in accordance with the approved details.*

*Reason: To ensure there are no adverse impacts on the adjacent moorings from the approved development.*

*Lighting Prior to the occupation of the development hereby permitted, full details of the proposed lighting scheme, to include a lux levels plan, shall be submitted to and approved in writing by the Local Planning Authority. The approved lighting should be implemented in accordance with the approved details.*

*Reason: In the interest of access, ecology, visual amenity and the waterway setting.*

*Landscaping The development hereby permitted shall not be occupied until full details of the proposed landscaping scheme (including the community garden) have been submitted to and approved in writing by the Local Planning Authority. The landscaping scheme should include reference to plant species types, surface treatments, fences and walls, any signage and information boards together with the means of on-going maintenance. The approved landscaping scheme shall be implemented by the first planting scheme after the development commences.*

*Reason: In the interests of the appearance of the site when viewed from the waterside, access and to enhance the biodiversity of the area.*

#### *Informatives*

*The applicant/developer is advised that any surface water discharge into waterspace belonging to the Canal & for further information ([liz.murdoch@canalrivertrust.org.uk](mailto:liz.murdoch@canalrivertrust.org.uk)). For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.*

14.14 The Applicants are happy to accept the above suggested conditions and informative.

## 15.0 MET POLICE

15.1 Officers suggest that the proposals have not been discussed with the Met prior to the submission of the application. This is incorrect. Please refer to the submitted DAS for further information.

15.2 Notwithstanding the above, officers have raised a few matters which we summarised below;

*- The shared plaza leads down passed the A2 residential block, into the dead end and the start of the proposed ball court and private entrance to the communal gardens. This public area will have very little passing or natural surveillance, in our opinion this area is likely to adopted by local ASB activity and promote criminal activity. Residents using A2 communal entrance and residents of Flat 1 (A2) are more likely to become repeat victims of ASB harassment and crime.*

15.3 The projects have ensured that this area is covered by numerous overlooking from the proposed block A2. This area also benefits from longer views across the ball court/ Sewardstone Road, and views along Lark Road. Furthermore, the proposed bike and bins stores for block A2 are located in this space to ensure that there is always some level of activity.

15.4 In addition to the above, secondary windows serving the community building are provided into this part, and the access to the adjacent ball court will be exit only, ensuring that there is no through traffic from the adjacent games area.

*- The communal entrance for core A1 and flat 1 (A1) is hidden from street view. Flat 1's living area and the building line protrude causing hidden entrances. Any area hidden from public view is more likely to become misused and be targeted by criminals.*

15.5 The architects have removed the stair core to block A1 entirely. A new family-sized maisonette is provided instead, entered by a secure deck access at 1st floor level from the canal side.

*- Flat 1's (A1) resident's entrance should be defined. A clear demarcation from the A1 communal entrance and private space of flat 1's entrance. Clear ownership of areas, especially entrances, is essential for residential to manage and take control and pride of an area.*

15.6 The front door entrance to flat A1, a domestic style, principally solid door, will clearly appear a domestic entrance. There will be a clear distinction between the entrance door to unit A1, and the adjacent communal entrance which will be much more open and transparent/inviting.

*- Protection around the ground floor resident's windows, especially the one that face directly onto public areas appears to be lacking. Protecting windows from being targeted by ASB 'banging on windows' will reduce the likelihood of residents becoming repeat victims.*

15.7 The landscape scheme has been updated to incorporate extended areas of defensible space. **See updated landscape drawings plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).**

*- In the public area, opposite the proposed nursery a single bike stand is shown building hidden by trees. To reduce the likely hood of cycle theft and to protect the user the stand should be placed in a more visible location.*

15.8 The bike stand has been relocated to reduce the likelihood of theft. **See updated landscape drawings plan no's L-S-002-19185-PH02-PL05; L-S-003-19185-PP03-PL05; L-S-19185-GA01-PL05; L-SC-801-19185-PS04-PL04, and updated Landscape Statement (Stage 3 Report).**

*- Both A1 & A2 communal entrances have open stairs with no secure lobby or airlock to protect from ASB entering these spaces. Most ASB in building occur when stair cores have no access control protection.*

- 15.9 The core to block A1 on the canalside has been removed. Nonetheless, entrances are secure and gated. Access will be via fob system.

*- The proposed nursery entrance needs a secure airlock lobby, so access control can be added. Ensuring visitors are vetted before being allowed entry into the main building is a basic safeguarding principle and should be included within the design.*

- 15.10 The proposed nursery is secure, with access control. The submitted plans show a two-stage entrance into the nursery to allow visitors to be vetted etc.

*- If the planning department decided to grant planning permission, the applicants are happy to accept the following condition, suggested by the Met Police, to ensure the above appropriate items are implemented within the build:*

*Prior to occupation, the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. The development shall be carried out in accordance with the approved details and thereafter shall be fully retained and maintained as such for the lifetime of the development.*

*Informative: The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.*

- 15.11 The Applicants are happy to accept the above suggested condition and informative.

**16.0 DAYLIGHT/SUNLIGHT (DELVA PATMAN REDLER)**

- 16.1 The Council instructed Delva Patman Redler (DPR), to independently assess the applicants submitted Daylight and Sunlight Report.

*The assessment by DPR identifies 4 neighbouring properties surrounding the site that are likely to experience a material reduction in daylight and sunlight from the proposed development, however 3 of the 4 properties considered would experience a negligible impact and 1 would experience a minor adverse impact as a result of the scheme proposals.*

*The neighbouring sunlight analysis further demonstrates that there will be a negligible impact as a result of the proposals.*

*The neighbouring shadow analysis demonstrates that there will be a negligible impact as a result of the proposals.*

*DPR confirm that the proposed daylight and sunlight results to the new units are considered to be acceptable. The proposed shadow analysis demonstrates full compliance with the guidelines, however clarification is sought for Garden 3 as the numerical result and area illustrated on plan do not appear to correlate.*

*DPR also suggest that the ballpark is assessed for overshadowing as there would be a reasonable expectation of sunlight.*

*Finally, separately from DPRs assessment, officers have also requested that the daylight sunlight report include assessment of the adjacent boathouses.*

- 16.2 Please find attached the **updated Daylight & Sunlight Assessments** prepared by Right of Light Consulting, which clarifies the numerical results for Garden 3. The attached updated report has also assessed the ballpark, where the results will see an improvement over the existing facility.
- 16.3 Finally, the updated report now also includes assessment of the adjacent boathouses, again confirming compliance with relevant standards, and also reflects the revised layout/massing of the proposed development, reflecting the reduced 13-unit proposals.

## 17.0 SUMMARY AND CONCLUSIONS

- 17.1 This Planning Addendum has been prepared on behalf of Tower Hamlets Council, in support of their application for the comprehensive redevelopment of the Canal Club Community Centre, Waterloo Gardens, and in response to statutory consultee comments.
- 17.2 The Site currently provides a nursery, community garden, playspace and ball court. The building and facilities are generally dated and in need of investment. The currently layout of facilities is poor, resulting in poor legibility, access, and constitutes an under-utilisation of this very sustainable, urban site.
- 17.3 The Site falls within the Victoria Park Conservation Area and lies directly south of Regent's Canal. The surrounding area is predominantly residential in character. The built form surrounding the site is varied but predominately a mix of two storey residential dwellings and five storey post-war blocks of flats.
- 17.4 Following extensive consultation with the local community and the local planning authority, it is proposed to comprehensively redevelop the site, including the demolition of the existing community building, play space, and ball court/enclosure. In their place it is proposed to create a new mixed-use development including re-provision of a community building, ball-court, community garden, children's play area and 13 new self-contained residential units, and extensive hard and soft landscaping.
- 17.5 The development brings the community building into a central and prominent location on the Site, fronting Sewardstone Road. It is intended to emphasise the community provision of the site and serve as a local landmark. The two-storey building will accommodate a nursery at ground floor, the existing nursery operator Scallywags Nursery will return. The 1<sup>st</sup> floor will comprise the community hall and kitchen.
- 17.6 A new civic square as social hub for community events is proposed at the heart of the development here community gatherings and celebrations can take place. A new shared surface on Lark Row will help calm the traffic.
- 17.7 The new ball court sits in broadly the same location as the existing. The new ball court will be a more traditional rectangular form, hard landscaped with enclosure, and will benefit from new goals and basketball hoop, served by a new, legible entrance fronting Sewardstone Road.
- 17.8 The existing community garden is re-provided in the north-east corner of the Site, adjacent the Canal/Belmont Wharf. The garden currently has limited access hours, and these are proposed to be revised so that it is a much more genuinely, publicly accessible space.
- 17.9 It is proposed to install brand new play equipment to serve the development and the wider local community.
- 17.10 It is proposed to construct 2, four-storey buildings, comprising a total of 13 self-contained flats. The unit mix comprises 3 x 1 bed, 4 x 2 bed, 3 x 3 bed and 3 x 4 bed. All of the 13 units will be in affordable tenure (comprising a mix of Tower Hamlets Living Rent or London Affordable Rent).
- 17.11 The proposed buildings accommodate the northern boundary of the Site, reinforcing the built edge of the canal and the clear sense of definition established by neighbouring properties. Architecturally, the two buildings accommodate three full floors, with a set-back fourth floor, in keeping with local design precedents. Elevations are formed principally of brickwork, with the third-floor parapet and fourth floors laid as soldiers to add visual interest. The massing of block A1 has been reduced to lessen its appearance and impact on the adjoining canal, as requested by officers and residents in the moorings. The proposed fenestration has also been regularised and realigned and creates a vertical emphasis. This reconceiving the previous deliberately unaligned arrangement.
- 17.12 The proposed mixed-use development will make best use of this underutilised site through re-provision and enhancement of the existing community/nursery building, the ball-court, the community garden

and the children's play area, alongside new residential units and significant landscape and amenity improvements for the local and wider community.

- 17.13 In line with the NPPF, London Plan and Local Plan policies, the development promotes use of under-utilised land and buildings, especially as this would help to meet identified needs for housing. The proposals will deliver multiple planning benefits; the principle of redevelopment is encouraged at all tiers of planning policy within the Framework.
- 17.14 We respectfully ask that planning permission is granted for this proposal.



ARTISTS IMPRESSION OF PROPOSED DEVELOPMENT – VIEW FROM SEWARDSTONE ROAD