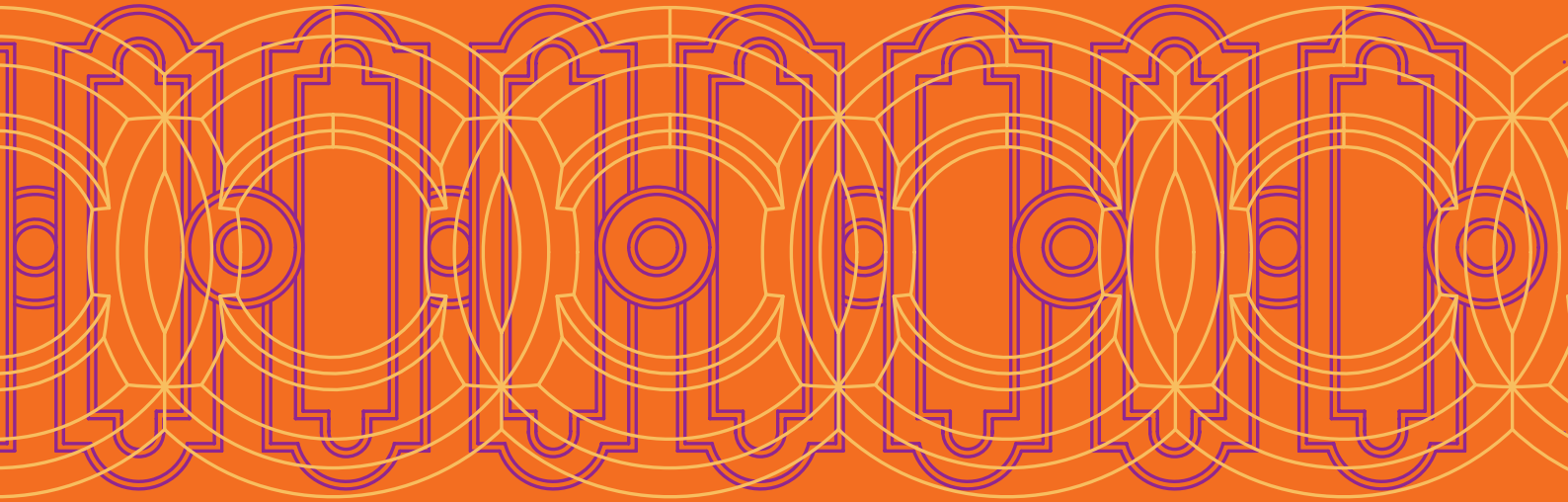


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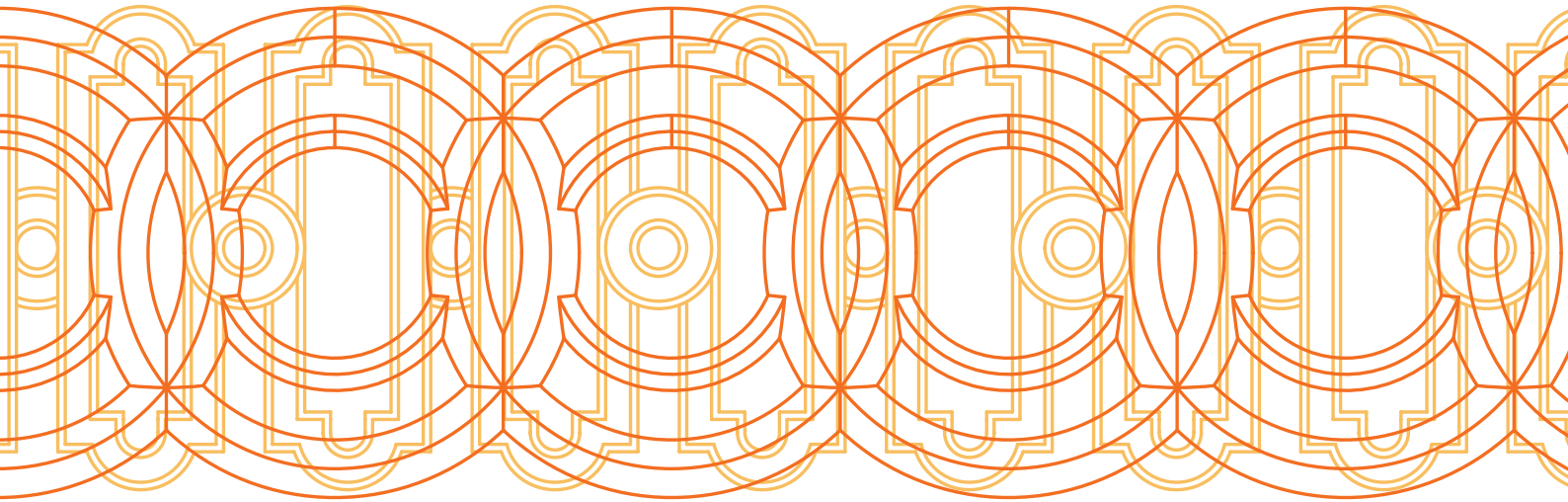
B E T H N A L G R E E N

# Planning & Affordable Housing Statement

St William  
Designed for life



Rogers  
Stirk  
Harbour  
+ Partners



**Marian Place Gasholders,  
Bethnal Green  
Planning & Affordable  
Housing Statement**

**February 2019**

St William Homes LLP

**LICHTFIELDS**

16279/01/SSL/ZS



# Contents

		1
<b>1.0</b>	<b>Introduction</b>	<b>1</b>
	Pre-Application Consultation	1
	Environmental Impact Assessment Scoping Opinion	2
	Content of the Application	2
	Structure of this Statement	5
<b>2.0</b>	<b>Background</b>	<b>7</b>
	Application Site	7
	Relevant Planning History	8
<b>3.0</b>	<b>Consultation and Engagement</b>	<b>11</b>
	Pre-Application Advice	11
	London Borough of Tower Hamlets	11
	Greater London Authority	18
	Other Statutory Consultees	21
	Public Consultation	21
	Summary	21
<b>4.0</b>	<b>Proposed Development</b>	<b>22</b>
	Description of Proposed Development	22
	Quantum and Dwelling Mix	22
	Layout, Scale and Massing	23
	Design and Materials	25
	Inclusive Design	26
	Access, Servicing and Parking	26
	Servicing	27
	Public Realm, Landscaping and Amenity Space	28
	Energy and Sustainability	30
<b>5.0</b>	<b>Planning Policy Context</b>	<b>31</b>
	Introduction	31
	National Planning Policy Framework (2019)	31
	Statutory Development Plan	32

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	Other Material Considerations	37
<b>6.0</b>	<b>Planning Policy Assessment</b>	<b>42</b>
	Principle of Development	42
	Housing	45
	Urban and Inclusive Design	48
	Residential Quality	53
	Heritage	59
	Open Space, Public Realm and Landscaping	61
	Transport	63
	Energy, Sustainability and Overheating	65
	Environmental Issues	68
<b>7.0</b>	<b>Planning Obligations and CIL</b>	<b>74</b>
	Draft S106 Heads of Terms	74
	Community Infrastructure Levy	74
<b>8.0</b>	<b>Conclusion</b>	<b>75</b>

## Figures

Figure 2.1 Canal Boat Moorings - Regent's Canal	8
Figure 4.1 Proposed Landscape Character Areas	29
Figure 5.1 Marian Place Gas Works and The Oval Site Allocation	36
Figure 6.1 Approach to residential aspect and views	55

## Tables

Table 1.1 Application Documents	2
Table 2.1 Relevant Planning Applications	9
Table 2.2 London Borough of Hackney: Relevant planning applications	10
Table 3.1 GLA Feedback	19
Table 4.1 Quantum and Mix	23
Table 4.2 Proposed Non-Residential Floorspace by Building (excluding landlord areas and residential amenity)	23
Table 4.3 Proposed Non-Residential Floorspace by Use Class	23
Table 4.4 Required and Proposed Children's Playspace	29
Table 6.1 Proposed Housing Mix	46
Table 6.2 Housing Mix Policy Comparison (by unit)	46
Table 6.3 Proposed Affordable Housing	48
Table 6.4 Child Playspace Calculations (GLA Population Yield Calculator)	58
Table 6.5 Summary of responses to Be Lean, Be Clean, Be Green	66

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# Appendices

Appendix 1 Adopted and Emerging London Plan Policies

Appendix 2 Tower Hamlets Local Plan Policies



## 1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of St William Homes LLP ('St William') in support of a full planning application ('the Application') for the redevelopment of Marian Place Gasholder Site, Bethnal Green, E2. This Statement has been prepared to assist London Borough of Tower Hamlets (LBTH) in their consideration of the application.

1.2 The Application responds directly to current strategic and local planning policy, as well as national planning guidance provided by the National Planning Policy Framework (NPPF) (2019). The Application proposes to redevelop the Marian Place Gasholder site to create a new high-quality, mixed-use development comprising 555 new homes together with 4,182sqm of non-residential floorspace. This application is also seeking permission for demolition in a Conservation Area. The application is for full planning permission.

1.3 The description of development is as follows:

*“Demolition of existing buildings, decontamination/remediation of the site and retention (including dismantling, refurbishment and reinstatement) of the two existing gasholder frames to facilitate redevelopment for a mixed-use development comprising 5 buildings ranging between 6-13 storeys (up to 63m AOD) to contain 555 residential dwellings and 4,182sqm (GIA) non-residential floorspace in flexible A1-A4, B1 and D Use Classes (maximum provision of up to 180sqm A1/A2, up to 1,300sqm A3/A4, up to 2,485sqm of B1(a) and up to 635sqm of D1/D2 use class floorspace), together with access, car and cycle parking, associated landscaping and public realm, public open space and works to the existing canal wall, Pressure Reduction Station and existing gasholders.”*

1.4 The site is allocated in the Local Plan for redevelopment as part of a wider site for residential and employment uses to meet local demand and need. The redevelopment of the Marian Place Gasholder site is a key part of this allocation and the only element (largely) unoccupied by existing buildings. A significant benefit of this application is the bringing into active use a key brownfield, former gasholder site while also respecting the site's historic use. This will involve the decontamination and remediation of the site, opening it up to the public for the first time since it was utilised as a gasholder site. This will also have the added benefit of activating a section of the Regent's Canal as an important public amenity space.

1.5 The two remaining gasholder frames act as a key landmark in this part of London and along the Regent's Canal and so their preservation and incorporation into the development proposals have been a fundamental component and consideration of the scheme. It is the intention for the two remaining gasholder frames to be refurbished and retained on site to form an integral part of development proposals.

1.6 The purpose of this Planning Statement is to assess the proposed development against relevant planning policies in the development plan, having regard to other relevant material planning considerations. The proposed development presents the opportunity to redevelop a highly sustainable brownfield site in Tower Hamlets, which is located in the City Fringe Opportunity Area.

## Pre-Application Consultation

1.7 The Application has been prepared following extensive consultation with many stakeholders including Officers at LBTH, the Greater London Authority (GLA), Historic England and Canal and Rivers Trust (CRT). The site has also been presented at Tower Hamlets Conservation and

Design Advisory Panel (CADAP). Extensive engagement with local residents, key stakeholders, established amenity and interest groups, local Councillors and businesses has also taken place.

1.8 Those engaged with the consultation process, the feedback received and how this has influenced the Application, is set out in the Statement of Community Engagement and within the Design and Access Statement.

1.9 The consultation process has been, and will continue to be, instrumental in bringing about the development at the Marian Place Gasholder site.

## Environmental Impact Assessment Scoping Opinion

1.10 Given the size of the Application Site and the quantum of development proposed, the development is considered to be EIA development as defined within Schedule 2 of the Environmental Impact Assessment (EIA) Regulations<sup>1</sup>. Specifically, part 10 (b) ‘Urban Development Projects’ threshold.

1.11 In accordance with Part 4, Regulation 15 of the EIA Regulations, a Scoping Opinion was requested from LBTH on 24<sup>th</sup> May 2019. A Scoping Opinion was received from LBTH on the 12 July 2019.

1.12 The Application is accompanied by an Environmental Statement (ES) that reports the likely significant environmental effects of the Application and proposed mitigation measures.

## Content of the Application

1.13 A suite of Reports and Plans have been submitted to accompany the Application. This detail is set out in Table 1.1

Table 1.1 Application Documents

Document	Purpose	Author	Format
Planning application form, covering letter, certificates and notices	To confirm the factual details of the application compliant with validation requirements	Lichfields	
Community Infrastructure Levy Form (CIL)	To assess whether the development is CIL liable.	Lichfields	
Application Drawings	Sets out the proposed development for approval	Rogers, Stirk, Harbour & Partners and Gillespies	
Design and Access Statement	Sets out and explains the design rationale and principles behind the proposals and explains the content, layout, access and circulation proposed, together with the public realm principles; a description of the design process; details on the proposed layout, massing, design and materiality of the scheme. Landscaping details are also provided and which detail the design concept,	Rogers, Stirk, Harbour & Partners and Gillespies	Standalone

<sup>1</sup> The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Document	Purpose	Author	Format
	hard and soft landscaping and proposals for long term maintenance and landscape management.		
Archaeological Desk-Based Assessment	Provides a summary of the updated position in terms of the archaeology works undertaken to date and future work to be undertaken.	RPS (CgMS)	Appendix P1 of Environmental Statement
Draft Construction Environmental Method Statement	This has been prepared to outline the proposed construction method and logistics of building the development.	St William	Appendix C2 of Environmental Statement
Daylight, Sunlight and Overshadowing Assessment	This report sets out the assessment of the internal light levels within the residential dwellings and provides an overshadowing assessment of the amenity areas.	Point 2	Chapter L of Environmental Statement
Planning & Affordable Housing Statement	Identifies the context and need for the development and includes an assessment of how the application accords with relevant national, regional and local planning policies.	Lichfields	Standalone
Energy Statement	This statement outlines the environmental sustainability measures that have been incorporated into the proposal. An Overheating Assessment has also been prepared in response to emerging London Plan policy SI4 which requires major development proposals to demonstrate how the potential for internal overheating is reduced, along with any reliance on air conditioning systems in accordance with the cooling hierarchy.	WSP	Standalone
Sustainability Statement	The Sustainability Statement demonstrates that the proposed Masterplan is sustainable, compared to the relevant local, regional and national planning policies.	WSP	Standalone
Outline Fire Strategy	Fire Strategy prepared to detail the fire safety strategy. This has been prepared based on the emerging London Plan policy D12, design guidance and recommendations given in <i>BS 9991:2015, Fire Safety in the design, management and use of residential buildings – Code of practice.</i>	WSP	Standalone
Statement of Community Engagement	Summarises the outcome of public consultation and stakeholder engagement.	Soundings	Standalone

Document	Purpose	Author	Format
Transport Assessment	The Transport Assessment provides information on the implications for the transport network of the development proposals. It considers the major modes of transport and provides a review of the current policy guidelines, the existing situation, an analysis of the likely conditions after development and recommends any mitigation measures that may be necessary.	TPP	Appendix H1 of Environmental Statement
Framework Travel Plan	The Travel Plan sets out both the 'hard' engineering measures and the 'soft' management measures necessary to address the transport impacts arising from development. This is 'living document' requiring monitoring, regular reviews and revisions to ensure it remains relevant to the site.	TPP	Appendix H2 of Environmental Statement
Deliveries and Servicing Management Plan	This has been provided to demonstrate management of disposal and proposed servicing arrangements of the development.	TPP	Appendix H3 of Environmental Statement
Flood Risk Assessment including Sustainable Urban Drainage Systems (SuDS) report	The FRA identifies and assesses the risks of all forms of flooding to and from the development and demonstrates how these flood risks will be managed, taking climate change into account. The FRA also includes the details of the proposed design of surface water management systems including Sustainable Drainage Systems (SUDs) and address the requirement for safe access to and from the development in areas at risk of flooding.	WSP	Appendix O1 of Environmental Statement
Heritage Statement	This Statement considers the special significance of heritage assets, and the harm or impacts caused by the development proposal.	Montague Evans	Appendix E1 of Environmental Statement
Health Impact Assessment	The Health Impact Assessment identifies, assesses and presents any potential effects on the health of the population arising from the proposed residential-led development.	Lichfields	Standalone
Equalities Impact Assessment	The EqIA has been prepared to identify, assess and present any potential impacts arising from the development on groups with	Lichfields	Standalone

Document	Purpose	Author	Format
	'protected characteristics' as defined in the Equality Act 2010, and to identify any interventions or mitigation measures required to optimise the impacts of the development.		
Retail Impact Assessment	The RIA will identify the key town centre and retail planning considerations associated with the commercial elements of the proposed development.	Lichfields	Standalone
<b>Environmental Statement</b>			
Environmental Statement Volume 1 – Main Report	Reports on the assessment of the likely significant effects of the application. Chapters include: Townscape and Visual Impact Assessment; Built Heritage; Ground Conditions; Socio-Economics; Transport; Micro climate and Wind Environment; Air Quality; Noise and Vibration; Daylight, Sunlight and Overshadowing Ecology and Nature; Climate Change; Water Environment; and Archaeology.	Lichfields	N/A
Environmental Statement Volume 2 – Technical Appendices	Reports on the assessment of the likely significant effects of the application.	Lichfields	N/A
Environmental Statement Volume 3 – Townscape and Visual Impact Assessment	Reports on the assessment of the likely significant TVIA effects of the application.	Lichfields	N/A
Environmental Statement – Non- Technical Summary	Reports on the assessment of the likely significant effects of the application.	Lichfields	N/A

## Structure of this Statement

1.14

This Planning Statement comprises the following sections:

- Section 2: provides a description of the site and surroundings and relevant planning history;
- Section 3: provides a summary of the engagement and consultation undertaken;
- Section 4: describes the proposed development;
- Section 5: summarises the relevant planning policy and other key documents for consideration;

- Section 6: provides an assessment against the statutory development plan;
- Section 7: sets out the proposed Planning Contributions, including draft Heads of Terms and CIL; and
- Section 8: provides conclusions.



## 2.0 **Background**

2.1 The purpose of this Section is to provide background information to the planning application submission. It provides a brief description of the site and immediate surroundings and the planning history of the site and immediate surroundings. This background information assists in defining the key planning issues against which the proposed development will be considered later in this Statement.

### **Application Site**

2.2 The Marian Place Gasholder site ('the Site') is located in the St Peter's Ward in the north of the borough in an area known as Cambridge Heath. The site sits adjacent to the Regent's Canal which acts as the boundary between Tower Hamlets and Hackney to the North. Access to the site is from Marian Place via Pritchard's Road. Cambridge Heath, a designated Neighbourhood Centre, is located to the southeast of the site.

2.3 The Site is a brownfield, former utilities site which was used for the storage of gas until May 2012 when the last three gasholders were decommissioned (the gasholders were purged to air<sup>2</sup>) following improvements in the technology/method of storing gas which made redundant the need for large storage gasholder drums. Retained on site are two gasholder frames, referred to as gasholder numbers 2 and 5, which are both located in the Regent's Canal Conservation Area, the Pressure Reduction Station (PRS) (to be retained following redevelopment) and two substations and a building adjacent to the PRS (to be demolished as part of the development proposals). Both existing gasholder frames are not listed and have a certificate of immunity which expires 9 December 2020.

2.4 Details relating to the history of the site can be found in the Heritage Statement prepared by Montagu Evans (appendix E1 of Environmental Statement) and the Townscape and Visual Impact Assessment (Chapter D of Environmental Statement). The south west corner of the site falls within View 8A.1 of the London View Management Framework.

2.5 The site is subject to the following designations:

- 1 Within the Marian Place Gasworks and The Oval site allocation
- 2 The northern part of the site is located within Regent's Canal Conservation Area
- 3 Within Cambridge Heath Local Employment Location
- 4 Borders the London's Canals Site of Importance for Nature Conservation
- 5 Part of the Green Grid Network

2.6 The nearest station is Cambridge Heath, which is served by London Overground services which is approximately 300m walking distance to the south-east from the site. The nearest bus stops are on Hackney Road, approximately 200m to the south-east of the site. These are served by routes 26, 48, 55 and N55. The site is within Public Transport Access Level (PTAL) zones 4-6a (where 1 is the least and 6b is the most accessible).

### **Hazardous Substance Consent**

2.7 The site previously held a Hazardous Substance Consent (HSC) for the storage of gas (dated 22 January 2001), however, Tower Hamlets as the Hazardous Substance Authority, issued a

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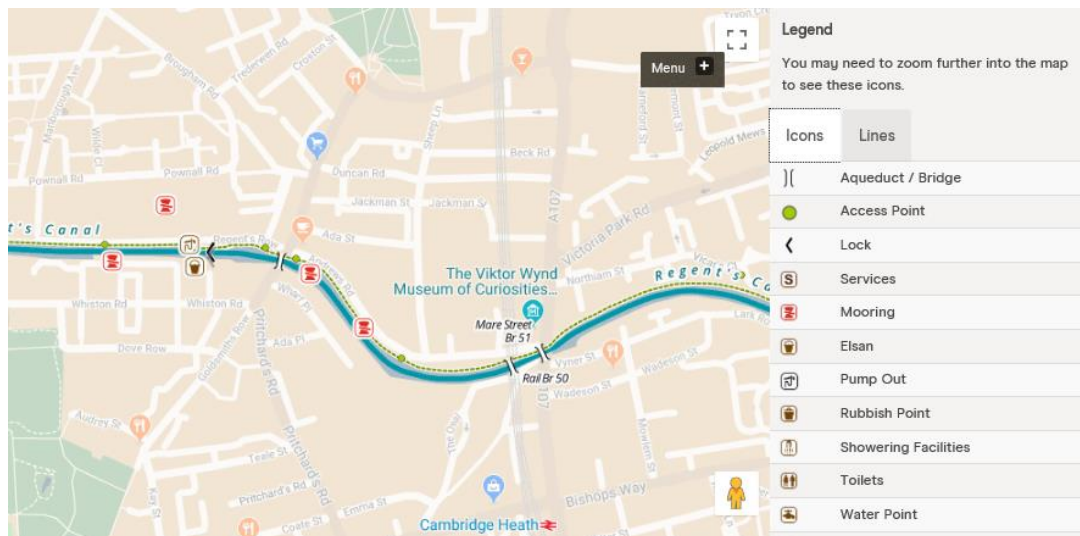
<sup>2</sup> The gasholders were purged of air on the following dates: No. 1/4/5: 16 May 2012; No. 2: 15 December 2010. Further details can be found in the application for the revocation of the Hazardous Substances Consent (ref. PA/01067/NC)

Revocation Order to the National Planning Casework Unit. The Order took effect on 12 December 2019 upon confirmation by the Secretary of State (ref. PA/18/01067/NC).

### Surrounding Area

- 2.8 The site is bounded by properties fronting onto The Oval to the east, Emma Street to the south, and Pritchard’s Road to the west. A gap between the existing buildings on the southern boundary connects the site to Emma Street. Properties to the east and south are generally light industrial buildings containing a range of uses including fitness, media, design and charities. These include, for example a Royal Mail sorting office on Emma Street and a Lithuanian church on The Oval. The Oval is also occupied by a number of warehousing and light industrial uses but has recently diversified and now includes storage containers fronting the canal which have temporary permission for use as B1 floorspace and the Oval Space, which had temporary planning permission to operate a multi-use arts and events venue from the site; this permission lapsed in May 2019. The Oval itself is designated as a London Square and publicly accessible open space and has recently had work undertaken to it to convert the central place back to its designated use (see application ref. PA/16/01294/NC).
- 2.9 Regent’s Canal to the north is operated by the Canal and River Trust (CRT) and contains a number of moorings (see Figure 2.1). It is also designated as a Site of Importance for Nature Conservation.

Figure 2.1 Canal Boat Moorings - Regent's Canal



Source: <https://canalrivertrust.org.uk/enjoy-the-waterways/canal-and-river-network/regents-canal>

- 2.10 Land immediately the west of the site, including Darwen Place, is occupied by residential buildings of up to six storeys.
- 2.11 Directly to the north of the site, across the canal is the London Borough of Hackney.

### Relevant Planning History

- 2.12 Due to the site’s former use, there are a number of applications for the continuation of the HSC. The earliest of these on the LBTH planning register is dated 2001 (ref. PA/00/01825) with another submitted in 2002 (ref. PA/02/00453) following a change in control of the land. An application for the revocation of the HSC was submitted in May 2018 (ref. PA/18/01067/NC) and was approved on 12 December 2019.

2.13 Aside from the above applications, there are no other relevant planning applications for this site.

2.14 There are, however, a number of relevance within close proximity; these are noted in Table 2.1.

Table 2.1 Relevant Planning Applications

Site Address	Description/ref no.	Decision
8 Pritchards Road	Change of use from B2 (wholesale coffee roasting) to mixed B2/A3 (wholesale coffee roastery/restaurant/cafe) with associated external changes, installation of extraction equipment and variation of existing opening hours (ref. PA/19/00850/NC)	Approved 7 January 2020
1-3 Corbridge Crescent and 1-4 The Oval	Demolition of existing single storey commercial buildings, with the retention, restoration, external alteration and residential conversion of the existing Regency and Victorian Cottages, together with the erection of three linked blocks of 4, 5 and 8 storeys to provide 51 residential dwellings (Use Class C3), with associated private and communal amenity space, cycle parking and refuse storage, and 461sqm of dual use office/community floorspace (Use Class B1/D1) (PA/16/03773/A1; PINS ref. APP/E5900/W/17/3179119)	Approved at appeal 5 April 2018
	A minor material amendment to the scheme was proposed amendment to the ground floor layout, including infilling the undercroft to provide additional commercial floorspace and the internal layout on the upper floors to improve the efficiency; the increase the number of residential units from 51 to 56; an increase in affordable housing from 6% to 9%; changing the winter gardens to recessed balconies; reconfiguring roof-level communal amenity spaces, including the provision of additional communal amenity space; and changing the facing material from pre-cast concrete to brick (ref. PA/18/02970/S)	Approved 15/05/2019
Containerville at The Oval and 5-10 Corbridge Crescent	There have been a number of applications approved for the temporary use of containers on these sites for various small businesses. The most recent application for 5-10 Corbridge Crescent extended B1 container use up to October 2021 (ref. PA/19/00378/S). With those at Gossamer Gardens approved until April 2022 (ref. PA/17/00306/A1)	Approved (most recent) 19/07/2019
29-32 The Oval	Change of use of part ground floor and first floor of property to provide a multi-purpose arts and events space, including the holding of a maximum 30 music entertainment events until 06:00hrs per year; formation of roof terraces at first floor level; erection of a new fire escape stair on the front elevation; associated cycle parking, plant and other related improvements for a temporary period of twelve months (PA/13/00915/NC).	Approved 15/10/2013
	Continued use of above for period of 30 months from date of decision (ref. PA/14/02459/NC)	Approved 17/02/2015
	Change of use of part of the ground floor for employment purposes (Class B1, B2 & B8) (ref. PA/15/03193/NC)	Approved 04/02/2016
	Continued use of multi-purpose arts and events space, including a maximum of 30 music events until 6am per calendar year and retention of roof terraces (ref. PA/17/01844/NC) Under condition 1, this use expired.	Approved 05/01/2018 Expired on 1 May 2019

Site Address	Description/ref no.	Decision
Days Inn Hotel, 419-437 Hackney Road	Erection of a part fourth, fifth & sixth floor extension to existing hotel to facilitate a further 26 apartments with aluminium clad recesses and a slim roof profile (ref. PA/14/01979/EX)	Approved 30/03/2015

2.15 Due to the proximity of the site to the London Borough of Hackney, a review of planning applications relevant to the site has been undertaken; these are included in Table 2.2.

Table 2.2 London Borough of Hackney: Relevant planning applications

Site Address	Description/ref no.	Decision
Ion House 1-3 Sheep Lane London E8 4QS	Demolition of existing buildings and erection of a part 2, part 5 and part 7, plus basement to provide 3,165sqm of office floorspace (Use Class B1) at basement ground and first floor level and 40 residential dwellings on the upper floors with 7 x 1 bed, 23 x 2 bed and 10 x 3 bed, together with associated amenity space, refuse storage and cycle parking facilities (re. 2016/3600)	Approved 08/01/2018
40 Andrews Road London E8 4RL	Continued temporary use of the site for storage, vehicle de-commissioning and re-commissioning works, installation of storage containers and continued use of existing Portacabins for a period of 5 Years (sui generis use) (ref. 2017/4983)	Approved 21/03/2018
1 - 3 Mare Street London E8 4RP	Demolition of existing single storey A3 cafe building and erection of five storey mixed use building comprising A1/A2 unit at ground floor level and 4 X 2 bed residential units on the upper floors (re. 2015/1532)	Approved 04/09/2015

## 3.0 Consultation and Engagement

- 3.1 In developing the proposals for the site, St William has undertaken extensive pre-application consultation, including meetings with LBTH, the GLA, Historic England and the CRT. Discussions have also been undertaken with local groups and the public including at a three day formal public exhibition, and a series of other consultation events and meetings. The feedback from these pre-application discussions has informed the final scheme which has been modified where appropriate.
- 3.2 The full details on the community consultation process is set out in the accompanying Statement of Community Involvement prepared by Soundings. The below section details the pre-application consultation process with LBTH, GLA and other key stakeholders.

### Pre-Application Advice

- 3.3 The proposed redevelopment of the site has been the subject of a constructive, inclusive and responsive pre-application design and development process since November 2018. During this period, a significant number of pre-application meetings have been held with LBTH Officers, including the scheme being presented to the Conservation and Design Advisory Panel (CADAP). The proposals have also been subject to two GLA pre-application meetings. A summary of the comments made can be found below with details on how the scheme responded to comments in blue. For ease, some have been grouped depending on the stage of the project and the material presented.

### London Borough of Tower Hamlets

#### LBTH Design Workshops – 11 November 2018, 6 December & 11 February 2019

- 3.4 Initial conceptual workshops were held with LBTH in November and December 2018 and February 2019 and which sought to obtain feedback on the design and heritage issues relating to the design proposals. Material presented at these meetings focused on the historic context of the site, using maps and photographs to show the form and layout of streets and buildings surrounding the site and consider the visual prominence of the gasholders when in-use. A comprehensive review of amenities was also undertaken to help inform the mix of uses that would be appropriate as part of the development proposals. Based on this review, initial design concepts and a proposed site layout were detailed, showing four radial buildings on the same footprint as the existing gasholders. Early ideas for the landscape design were also included.
- 3.5 Initial feedback was received on 22 March 2019 with a comprehensive response issued on 10 April 2019. A summary of the key points is outlined below along with a response to the comments:
- 1 The principle of residential led scheme was supported.
  - 2 The existing gasholders are considered to be non-designated heritage assets. The retention of both gasholders is essential, and they should be preserved and enhanced through their re-use on the site. *St William confirmed that the retention of both gasholders was an aspiration of the design team and that surveys were being undertaken to determine if the gasholder frames could feasibly be retained.*
  - 3 Any development within gasholder no.5 should be leave the top tier unfilled. No part of the proposed development should rise above the height of the proposed new development

within gasholder no.5. *The proposals do not rise above the gasholder frame and the building within gasholder no. 5 is the tallest proposed.*

- 4 With the impending revocation of the HSC, it is vital the site delivers a strategic large quantum of new housing and a transformed place that retains the true vibrancy of the existing area and a genuine heterogeneity of land use activities. This must include a cultural offer and a quantum employment uses including spaces suitable for small and medium-sized enterprises, start-ups and creative and tech industries. *The proposed non-residential floorspace has been designed to be suitable for a range of uses and occupiers with flexible uses proposed.*
- 5 The voids beneath the gasholders should be explored for their potential to provide potential workspaces and/or cultural events space. It is key to understand whether this is a scheme capable of taking on the true character of a new piece of heterogeneous cityscape or a scheme of residential ambition which benefits from some publicly accessible open space. *The development proposals will utilise part of each of the existing gasholder voids for non-residential and ancillary car and cycle parking, plant and refuse.*
- 6 The provision of rooftop garden spaces, open to the general public to enjoy appears to be a missed opportunity. *This was reviewed by the design team but was not considered necessary due to the significant amount of publicly accessible open space at grade and the cost/management/design implications of facilitating access to the roofs. This position was confirmed to LBTH officers at the 25 April pre-application meeting.*
- 7 The basic layout and massing of the scheme needs to be agreed at an early stage in the pre-application process. Distances between the proposed buildings and the site boundary should be reviewed. *The buildings are set at least 9 metres from the site boundary and have been positioned so that while there will be locations where the distance between buildings falls below 18m, the radial forms of the buildings mean the smallest dimension between the buildings is limited to one position. Windows and balconies have been carefully placed to limit/prevent any overlooking and ensure privacy.*
- 8 The conceptual decision to introduce new buildings referenced on the footprints to the existing gasholders is supported as a general principle. However, proximities between gasholders will present problems in terms of privacy, overlooking, outlook and access to daylight and sunlight. *See comment above.*
- 9 The presence of the Pressure Reduction Station (PRS) by the entrance of the site unavoidably impedes visual sightlines, which is a concern and needs to be explored further in terms of integrating it into the landscaping. *A landscape design solution is proposed which comprises the concealment of the retained equipment by a perimeter wall formed of a reflective, non-climbable material. This is then surrounded on two sides by a grove of trees and key pedestrian access routes. A low level water feature is also proposed.*
- 10 It is acknowledged that there is no expectation St William would deliver all one hectare of the required open space, rather only a reasonable proportion. There were concerns about the proposed open space in relation to its size, location and inherent quality of the space. How the open space would be able to join up with future development on adjoining parcels also needed to be considered. The quality of various open spaces, including play space and public realm is hugely important for the building forms of the development. *The layout and number of buildings was amended (see notes below) to facilitate a consolidated area of open space, proportionate to the size of the site in the allocation.*
- 11 The massing proposed for the site is supported despite it resulting in taller buildings compared the surrounding area. The form and footprint of the building on the site of

former gasholder 4 should ensure it provides good quality residential units, maximise dual aspect units and limit impacts on surrounding properties. *Noted.*

- 12 The scheme should be car and permit free, with the exception of blue-badge holder provision on-site. Cycle parking to be provided in accordance with the emerging London Plan. *The scheme proposes to provide 57 car parking spaces representing the full 10% of accessible spaces required.*

### **LBTH Consultation and Planning Meeting – 31 January 2019**

- 3.6 A planning pre-application meeting was held with LBTH officers to discuss the general progress of the development proposals, a possible PPA with LBTH, proposed stakeholder and community engagement, LBTH land at 33, 35 and 37 The Oval and the application to revoke the Hazardous Substance Licence for Marian Place Gasholder site.

### **LBTH Pre-Application Meeting – 11 April 2019**

- 3.7 A pre-application meeting was held with LBTH following a significant revision to the scheme resulting in the removal of one large, radial building and its replacement with two smaller radial buildings. This change had a positive impact on the layout of the site which could now accommodate a large area of consolidated open space and amenity benefits such as improved daylight and sunlight into flats and landscaped/public realm areas, pedestrian movement through the site and privacy distances between buildings and the site boundary. The breaking up of the massing of the proposed built form also better reflects the townscape character of the surrounding area. Details showing the revised layout and massing along with details of possible façade treatments, residential dwelling layouts, townscape views and further detailed landscape design.
- 3.8 Formal feedback was provided by LBTH on 16 May 2019 which provided comments based on the material issued and presented for this meeting and subsequent material issued to the Council on 3 May 2019. The feedback can be summarised as:
- 1 Confirmation of the retention of both gasholder frames was requested. The Council also require the massing of the proposed buildings within the frame to be appropriately recessed and the crown of the frames to be left ‘adequately open’. *See note above regarding gasholder retention – both existing gasholder structures are proposed to be refurbished and retained as part of the proposals; the design proposals allow the crown of the frames to be left open.*
  - 2 The proposal to break down the mass of the two previously proposed buildings into three more slender towers was supported in principle.
  - 3 The creation of a ‘missing bead’ from the PRS and landscape features was supported.
  - 4 The proposed arrangement of service access around the site boundaries was provisionally supported in principle as it allows for the redevelopment of adjacent properties. Further details on the servicing arrangements was requested. *A Delivery and Servicing Management Plan is submitted with the application.*
  - 5 The proposals should demonstrate how the site layout and proposed buildings will provide residential accommodation which achieves adequate degrees of privacy, outlook and daylight and sunlight penetration commensurate with the “highest architectural quality. *The Design and Access Statement and the accompanying technical reports demonstrates a high level of residential amenity for future residential occupiers can be achieved. This is summarised in Section 6 of this Statement.*



- 6 Any development set less than 9m away from the site boundary is vulnerable to neutralising re-development on adjacent sites. A minimum of 9m should be provided from the boundaries. *See note above – this has been achieved.*
- 7 Officers noted there is a significant amount of useable floorspace capable for a range of uses including event space, work space, indoor sports space, amongst other possible uses located at subterranean level. Use of this space should be explored. *This was explored by St William and the design team and part of each of the existing gasholder voids are proposed to be used for non-residential floorspace and ancillary residential accommodation such as plant and refuse. Wider use of the drums is not possible due to the structural nature of the drums.*
- 8 Officers requested further information was to be provided on the roof spaces and the possibility of a roof top public space. *See comment above.*
- 9 Officers recognised the proposed scale substantially exceeds the prevailing scale of surrounding areas however is considered on balance justified.
- 10 The design of buildings B, C and D requires further work to reduce the bulk and mass of the buildings. Officers also requested the removal of the podium from Building A to enable greater visual permeability. *A break in Building A is proposed facilitating visual permeability.*
- 11 On landscaping and open space, a SWOT analysis on a series of prospective alternate options was recommended to justify final landscape proposals. *A detailed analysis is provided in the landscape section of the Design and Access Statement.*
- 12 Officers noted there appeared to be a large number of single aspect units and that this should be reviewed in the interest of residential amenity. The proposed dwellings should also be reviewed against the standards in the GLA Housing SPG. *The Design and Access Statement and the accompanying technical reports demonstrates a high level of residential amenity for future residential occupiers can be achieved. This is summarised in Section 6 of this Statement.*

### **LBTH Pre-Application Meeting – 25 April 2019**

- 3.9 A planning pre-application meeting was held with LBTH officers to discuss general planning matters associated with the emerging development proposals. No material was submitted to the Council ahead of this meeting. The following matters were raised and discussed:
- 3.10 Employment provision:
- A review should be undertaken over whether this could be provided not just at ground floor but at first floor and basement. In addition to all ground floors, non-residential floorspace is provided at basement level in Buildings A and E. It is not considered necessary to provide at first floor.
  - Officers also confirmed it would be possible to build-in flexibility into the planning permission in terms of uses but would like to see evidence of conversations with possible occupiers and that spaces have been designed with sufficient flexibility to be adapted. It was agreed that marketing at this stage would not be appropriate and any firm commitment from potential occupiers not possible.
  - Officers confirmed they did not expect the site to provide workspace similar to that at ‘Containerville’ and agreed in principle that the commercial space is likely to form part of the ‘staircase’ provision for those companies wishing to stay in the area.
- 3.11 Arts/events space:



- Officers confirmed LBTH would not be prepared to take on the space and there was no expressed policy to require its provision. It was suggested that the LBTH Culture Team could help finding proposed users for the space.
- St William confirmed the proposals would not include the provision of a publicly accessible roof terrace.

3.12 Public consultation:

- Officers were supportive of proposed strategy.
- Officers recommended that the scheme was present to the Strategic Development Committee as part of the pre-application process. *This was held on 20 November 2019 and was positively received.*

### **LBTH Pre-Application Meeting – 17 May 2019**

3.13 The material submitted and presented to LBTH officers tabled the latest iterations of the design proposals in relation to the PRS and its integration in to the landscape design and the façade treatment of the buildings and the use of colour. In response to the Council’s concerns regarding whether the design proposal would prejudice development that could be brought forward on neighbouring sites within the site allocation, a number of studies were presented detailing possible design solutions.

3.14 This pre-application meeting focused on a number of areas including residential amenity, façade details, proposed residential layouts, the Council-own Oval building and feedback from the public consultation (held 11, 13 and 14 May 2019). To inform the feedback, the Council requested residential layouts, a schedule of proposed commercial uses and the current viability position.

3.15 Regarding the design elements, the following points raised are of note:

- 1 Of the options provided, the proposed façade without colour was preferred by Officers. Officers also requested the vertical panels were reviewed to avoid them appearing flat on the elevation.
- 2 Suggest building envelope was reduced to provide more space between the frame and building.
- 3 Suggestion that cores should be rotated to increase distances between buildings and bring areas between building into the open space.
- 4 Design approached to PRS supported. Further details to be provided on pedestrian movements.

*The above comments were noted and have been addressed in the design proposals.*

### **Conservation and Design Advisory Panel (CADAP) – 10 June 2019**

3.16 A CADAP meeting was held on 10 June 2019, with formal feedback received on 28 June 2019. A summary of the key points raised is set out below:

- 1 CADAP members welcomed the redevelopment of the site and particularly the potential to create an attractive place with a strong identity.
- 2 Further information on wider movement and access routes around the site should be considered. Movement into the site should also be reviewed. *See landscape section of Design and Access Statement.*

- 3 The provision of circular buildings results in a potential for exciting and characterful space with a strong identity, however how public and private spaces are defined needs to be addressed. *See landscape section of Design and Access Statement.*
- 4 The scale and massing are appropriate, provided a high standard of architecture is provided.
- 5 Many residential unit layouts did not achieve suitable amenity standards. Alternative uses for the buildings should be considered to overcome these and deck access to the units should also be considered. *Deck access was considered by the design team but was not taken forward as it would not help to address any amenity issues.*
- 6 The Panel suggested that some elevational treatment could be provided on the new buildings to reflect the character of the retained gasholders.
- 7 The use of the existing underground spaces for a mix of uses should be explored. Light wells could be used to illuminate the space.

### **LBTH Pre-Application Meeting – 7 August 2019**

- 3.17 A pre-application workshop was held with LBTH Officers on 7 August, with formal feedback received after the 14 August GLA pre-application meeting on 27 August 2019. Material submitted to the Council ahead of the meeting included details of:
- 1 The site setting out – in response to Officer comments the position of buildings B, C and D have been rotated to increase the distance between buildings and the site boundary.
  - 2 Building organisation – showing residential aspect, views and orientation in response to Officer concerns over residential amenity.
  - 3 Outlook from a studio apartment in Building A – these were provided at lower, mid and upper levels.
  - 4 Commercial floorspace – including the proposed location of the suggested uses along with illustrative views showing the Building E colonnade, canal frontage and public realm.
  - 5 Latest landscape design proposals.
- 3.18 LBTH also considered the material issued to Officers on 3 July 2019 in its feedback which provided Officers with details of the proposed layout of the residential dwellings for all buildings and tenures.
- 3.19 Based on the latest iteration of the design proposals, the Council provided detailed comments on car and cycle parking, waste provision, non-residential floorspace, quality of residential accommodation, public realm and movement strategy, housing mix and energy and sustainability targets.
- 3.20 They key points under each of these subjects is provided below:
- 1 Car and Cycle Parking

Full provision of accessible bays is required from the outset (Officers will not support the proposal to flip disabled car parking bays into general residential parking over the life of the development, should the demand for the disabled parking bay not be fully utilised).

A proportion to be of ‘Sheffield’ type cycle stands should be included in the residential cycle parking areas to allow for adapted cycles. Short stay parking at grade should also be provided for all uses.

Cycle storage and accessible parking bays should be accessible from all building cores. Cycle parking should be well located, near to the entrance of the property and avoiding obstacles.

*Due to the constrained nature of the site, unless significant areas of the proposed landscape areas/public realm were used it would not be possible to provide the additional 7% of accessible car parking spaces if demand arose for them. As such, 10% (57 spaces) provision is proposed. Cycle parking, in line with Officer comments, has been provided. The location of the car and cycle parking is a result of the constrained nature of the site and the desire to maximise the amount of landscaped open space, public realm and non-residential floorspace. The accessible car and cycle parking spaces are accessible from the cores of Buildings C and D (containing all affordable and some private homes) and a separate pedestrian and cycle core will be provided for other residential occupiers in the public realm – access to this will be level, well-lit and directly link to the pedestrian/cycle walkway connecting all entrances.*

2 Waste Provision

The proposed bin stores occupy significant frontages of the ground floors of the buildings, particularly on Building A. These should be reviewed to avoid inactive frontages in prime locations.

*This has been addressed in the application proposals.*

3 Non-Residential Floorspace

The Council considers the provision of a significant amount of floorspace in B1 use to be a priority; a portion this should be affordable and low cost in line with emerging policy at local and regional level.

To avoid competition with Cambridge Heath Neighbourhood Centre, the provision of A class uses should be restricted to around 500sqm with no individual unit being larger than 200sqm.

*10% of the B1 office floorspace will be affordable; a Retail Impact Assessment accompanies the planning application which concludes there is a specific market and locational need for the type of non-residential floorspace to be provided within the application site and the proposal will not have a significant adverse impact on any designated centres.*

4 Quality of Residential Accommodation

Aspect – the number of single aspect units needs to be reduced where possible, particularly in Building A.

Balconies – where two separate balconies are proposed for some two and four bedroom dwellings, these should be consolidated in the interest of usability of the space for a family.

Shared circulation – the number of dwellings per cores needs to be justified.

*The Design and Access Statement and the accompanying technical reports demonstrates a high level of residential amenity for future residential occupiers can be achieved. This is summarised in Section 6 of this Statement. All balconies within the affordable rent tenure have been consolidated and only one balcony per dwelling is proposed.*

5 Public realm and movement strategy

The space between the proposed buildings and site boundaries needs to be reviewed to ensure they do not appear as leftover spaces or dominated by service uses, particularly as these are largely proposed for children's playspace.

A clearer public realm hierarchy should be prepared; this should be informed by a pedestrian movement strategy.

Locating communal open space on the roofs of the buildings to be explored.

Council's Transportation and Highways division do not support the provision of a 100% shared surface where pedestrians and vehicles are free to interact.

*These points have been addressed - see landscape section of Design and Access Statement.*

6 Building A – inner courtyard

Officers requested this space is open on both sides (north and south) and accessible to the public.

*Due to the proposed uses of Building A and the quantum of publicly accessible open space proposed, it is not considered necessary to open this space up to the public.*

7 Housing Mix

This should be provided in line with LBTH planning policy.

*Affordable housing is being proposed at 35% affordable housing. It can be demonstrated that there are exceptional circumstances are relevant to this site owing primarily, but not solely, to the refurbishment and retention of the guide frames of both gasholders no.2 and no.5, and as such, is in line with Main Modification 9 to Policy D.H2 of the draft Local Plan.*

3.21 There were also more detailed Topic based meetings with LBTH to discuss Town Centres, Enterprise, Regeneration and Sports, Leisure and Culture, Highways, Biodiversity and Housing.

## **Greater London Authority**

### **GLA Pre-Application Meeting - 28 February 2019**

3.22 The Application is referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008 ("the 2008 Mayor Order). A pre-application meeting with the GLA was held on 28 February 2019 which TfL and LBTH also attended. The details presented was the same as that presented to LBTH on 11<sup>th</sup> February 2019.

3.23 No formal feedback was received from the GLA, however, the following was discussed:

- 1 The principle of the residential-led redevelopment of the site is strongly supported.
- 2 The retention of both gasholders was key.
- 3 The crown of the gasholders should be free from development.
- 4 The ground floor of the development should provide active uses that complement the existing employment character of the area and provide some community use floorspace.
- 5 The site is within an area of open space deficiency and therefore consolidated open space should be provided which should allow for sport and recreation with stronger links to other sites.
- 6 The provision of B1(c) uses was encouraged.
- 7 The proposal should be car-free except for accessible parking.

### **GLA Pre-Application Follow-Up Meeting – 14 August 2019**

3.24 Following a presentation of the proposals for the site by RSHP, discussions covered strategic issues with respect to Opportunity Areas; utility, industrial, and employment uses; retail and town centre uses; social infrastructure; housing; affordable housing; urban design; historic environment; and transport.

3.25 Feedback was received from the GLA on 29 August 2019. The key comments made and details on how the design has been amended in line with these are summarised in Table 3.1.

Table 3.1 GLA Feedback

Subject	GLA response	Response/comment
Principle of development	Subject to satisfactorily demonstrating the agent of change principles have been fully considered, the provision of 548 residential units in a high-density mixed-use development on this brownfield site well-connected to public transport, is supported in principle.	Use of The Oval space as a nightclub is temporary and permission expired in May 2019. This is addressed in Section 6 of this Statement.
Non-residential floorspace	While noting no detail had been provided on the amount of non-residential floorspace proposed, it was suggested food and beverage and retail uses should be scaled back.	A Retail Impact Assessment has been provided which concludes to there is a specific market and locational need for the type of non-residential floorspace to be provided within the application site and the proposal will not have a significant adverse impact on any designated centres.
	Suggested that the use of Buildings B, C and D should be limited to residential, residential amenity space, and social infrastructure	In order to provide active frontages across the site, non-residential floorspace is provided in all buildings. However, non-residential uses are largely concentrated in Buildings A & E.
	Noted that an element of Use Class B1 space for SMEs, start-ups, creative and tech industries may be appropriate, informed by the Council's assessment of need/demand.	Noted – flexible uses are being applied for.
	Affordable workspace to be provided in line with the Council's emerging policy.	Noted.
Open space	Considered to be proportionate and supported.	Noted.
Affordable housing	To be provided in line with Policy H6 with a threshold of 35%.	Noted.
Housing mix	The approach to housing mix and distribution is supported (subject to agreement with LBTH over mix of dwellings in shared ownership and private tenures).	Noted.
Design/residential amenity	The rationale for the cylindrical massing of the three new standalone blocks is understood, as it reflects the previous and retained gasholder structures. Officers require further information to justify that the benefits of the proposed layout outweigh any non-compliance with GLA residential amenity standards.	This detail is provided in the Design and Access Statement.

Subject	GLA response	Response/comment
	Proposals should seek to meet Housing SPG standards where at all possible.	Noted – residential dwellings have been designed to accord with this where possible.
	The form and massing of the buildings within the two retained gasholder structures is supported.	Noted.
	In terms of three new buildings proposed (B, C and D), Officers consider it unnecessary to introduce the residential quality limitations of the two retained gasholder buildings. Suggested an orthogonal approach may be more successful.	This is discussed in the Design and Access Statement and the current arrangement is considered to best respond to the site’s opportunities and constraints.
Transport	Walking and cycling routes must be considered as part of the transport assessment and walking and cycling to/from the site should be encouraged. As per TfL guidance, an Active Travel Zone assessment methodology should be used.	Noted – this is included in the Transport Assessment.
	The shared streets proposal is supported, provided the streets are designed to be pedestrian focused.	Noted.
	The current proposal for 30 general car parking spaces is unacceptable.	The 57 car parking spaces represent the full 10% of the required accessible car parking spaces.
	Cycle parking should be provided in line with draft London Plan standards; provision above these levels is encouraged.	Noted – this has been provided.
	Current cycle parking proposals are not considered to comply with requirements of draft London Plan and LCDS and should be amended to include a proportionate split of cycle parking across all buildings and ground floor storage.	A separate cycle and pedestrian access is provided in the public realm. This is served by a level pedestrian/cycle path which connects to each residential building and provides a clear, convenient and legible route.
	An outline Construction Logistics Plan (CLP) should be submitted with the transport assessment. Given the proximity of the Regent’s Canal, the applicant should consider the use of water to transport construction materials, including waste.	This has been submitted as part of the CEMP.
Energy & Sustainability	Applications encouraged to be prepared in line with GLA Energy Assessment Guidance and London Plan policy.	Noted.
Flood Risk	The site is greater than 1 hectare in area; a Flood Risk Assessment (FRA) will therefore need to accompany the application.	FRA provided as appendix O1 of ES.
Urban Greening	The landscape proposals should be closer to the 0.4 Urban Greening target.	The UGF score for the proposals is 0.39.

## **Other Statutory Consultees**

3.26 Meetings were also held with the following key stakeholders:

- 1 Canal and Rivers Trust (various dates)
- 2 Historic England Meeting (various dates)
- 3 Secured by design – 26 July 2019

## **Public Consultation**

3.27 A public exhibition was held in relation to the draft development proposals near to the site. This took place on 11<sup>th</sup> (11am-6pm), 13<sup>th</sup> (3pm-7pm) and 14<sup>th</sup> May (11am-3pm) 2019. Invites were distributed to local residents and businesses to advertise the exhibition and to invite them to visit the exhibition.

3.28 The exhibition comprised a number of proposal boards, detailing the background, proposed development and evolution behind the proposals. A feedback form was provided at the exhibition which asked for comments about the proposed scheme. Further details of the comments received at the public exhibition can be found in the Statement of Community Engagement, prepared by Soundings. The comments received during the public consultation have been taken on board and a number of changes have been made to the scheme to reflect the comments received.

3.29 In addition to the three-day public exhibition a series of other consultation events have taken place including one-to-one meetings, walk-and-talk guided tours around the area and pop-up events.

## **Summary**

3.30 The proposed development is the product of a lengthy, detailed and responsive pre-application design development process with the GLA, LBTH, CADAP, TfL and the local community. The scheme has been amended and refined to address the issues raised. The consultation undertaken confirmed that the principle of the redevelopment of this site for residential-led mixed use development is supported by officers.

## 4.0 **Proposed Development**

- 4.1 This Section provides a summary of the proposed development. Full details of the proposed development are set out in the accompanying Design and Access Statement prepared by Rogers, Stirk, Harbour and Partners (RSHP) and Gillespies Landscape Architects.

### **Description of Proposed Development**

- 4.2 The description of development is as follows:

*“Demolition of existing buildings, decontamination/remediation of the site and retention (including dismantling, refurbishment and reinstatement) of the two existing gasholder frames to facilitate redevelopment for a mixed-use development comprising 5 buildings ranging between 6-13 storeys (up to 63m AOD) to contain 555 residential dwellings and 4,182sqm (GIA) non-residential floorspace in flexible A1-A4, B1 and D Use Classes (maximum provision of up to 180sqm A1/A2, up to 1,300sqm A3/A4, up to 2,485sqm of B1(a) and up to 635sqm of D1/D2 use class floorspace), together with access, car and cycle parking, associated landscaping and public realm, public open space and works to the existing canal wall, Pressure Reduction Station and existing gasholders.”*

- 4.3 For completeness, the application also seeks planning permission for demolition in a conservation area.
- 4.4 The proposed development will be accommodated in five buildings ranging between 6 and 13 storeys with commercial floorspace located at basement, lower ground and ground floor level and residential dwellings above across all five buildings. The main access to the site would be from Marian Place via Pritchard’s Road, while pedestrian access from Emma Street is also proposed. A pedestrian/cycle link into the site from Corbridge Crescent along Regent’s Canal will provide an additional access point into the site. This is currently gated by the owners of Containerville but discussions are underway with LBTH to unblock this route. The development proposals will deliver 35% affordable housing (by habitable room) in a 71:29 tenure split, with a high proportion of affordable rent, family sized dwellings. Communal and private amenity and children’s playspace will be provided onsite, meeting LBTH and GLA minimum standards.
- 4.5 The proposed development would make highly efficient and sustainable use of this accessible, brownfield urban site, while reflecting the industrial past of the area through the retention of two of the gasholder frames. The site is allocated for development in the Local Plan for redevelopment and the application proposal will bring forward and facilitate the Council’s aspirations for the site. It would provide high quality flexible non-residential floorspace within the City Fringe area, in addition to delivering 555 residential dwellings, making an important contribution towards pressing strategic and local housing objectives. The height, scale and massing of the buildings is a response to the site’s location and has been agreed with Officers following extensive pre-application discussions.

### **Quantum and Dwelling Mix**

- 4.6 The proposed development incorporates 555 homes, with a range of dwelling sizes, comprising Manhattan (studios), one, two, three and four bedrooms. The proposed mix of dwellings (including number of habitable rooms (hr)) is set out in Table 4.1.



Table 4.1 Quantum and Mix

	Private		Intermediate		Affordable Rent		Total	
	Unit	HR	Unit	HR	Unit	HR	Unit	HR
<b>Manhattan</b>	48	48	0	0	0	0	48	48
<b>1-bed</b>	182	364	37	74	14	28	233	466
<b>2-bed</b>	148	444	26	78	12	36	186	558
<b>3-bed</b>	30	120	0	0	36	170	66	290
<b>4-bed</b>	0	0	0	0	22	132	22	132
<b>Total</b>	408	976	63	152	84	366	555	1,494

4.7 The application makes the provision for 35% affordable housing (based on habitable rooms). This equates to 147 homes or 518 habitable rooms. The affordable housing provision is split 71:29 (by habitable room) between affordable rent and intermediate in accordance with the requirements of LBTH. A 70:30 split between Tower Hamlets Living Rent and London Affordable Rent and is proposed in the affordable rent component.

4.8 In terms of non-residential floorspace, the scheme will provide 4,182sqm (GIA) of floorspace, across the five buildings at basement, lower ground and ground level. The floorspace provided in each building is set out in Table 4.2. The proposed non-residential units would be suitable for a range of A1-A4/B1/D1/D2 uses.

Table 4.2 Proposed Non-Residential Floorspace by Building (excluding landlord areas and residential amenity)

Building	Max. Floorspace (GIA) (sqm)
A	1,895sqm
B	378sqm
C	362sqm
D	46sqm
E	1,444sqm

4.9 The non-residential floorspace is largely concentrated within Buildings A, B and E to take advantage of the new amenity space fronting the Regent's Canal.

4.10 The split between uses proposed is set out below and has been informed by the proximity of the site to the Cambridge Heath Local Centre and the services already provided and a commercial strategy which aims to provide amenity to both existing and future visitors/occupiers of the area/site. The proposed non-residential uses have been proposed to complement rather than compete with the existing non-residential uses. The split of the proposed floorspace by Use Class is provided in Table 4.3.

Table 4.3 Proposed Non-Residential Floorspace by Use Class

Use Class	Max. Floorspace (GIA) (sqm)
Retail (A1/A2)	Up to 180sqm
Food and Beverage (A3/A4)	Up to 1,300sqm
Office (B1(a))	Up to 2,485sqm
Leisure (D1/D2)	Up to 635sqm

## Layout, Scale and Massing

4.11 Due to the constraints imposed on the design of the proposed development due to the enclosed nature of the site by existing, low-rise warehouse style buildings and the desire to retain the existing gasholder frames (respecting their location in the Regent's Canal Conservation Area and

standing in the community as local landmark/heritage asset), an innovative approach to the site layout, scale and massing is proposed.

4.12 This has predicated the use of radial forms for the development in the gasholders and within the site as a whole to ensure a holistic design approach. This radial form has significant benefits in that it allows for the reuse and integration of the two gasholder frames into the proposed design, uses architecturally interesting forms which reduces scale and mass of the proposed buildings (particularly when compared to that of large square/rectangular buildings) and allows for substantial benefits in terms of residential amenity including, a greater degree of outlook from the apartments, increased proximity distances between flats and aids the penetration of daylight and sunlight. Also, it allows for all buildings to be orientated so the entrances directly open out onto the central landscaped space and the outer crescent circulation pedestrian walkway and routes to the perimeter landscape.

4.13 The proposed layout of the buildings which is in a circular form, allows for the delivery of a centrally-located, consolidated area of public open space (0.42ha), in addition to the canal edge open space (0.21ha). In total, 0.71ha of open space is proposed. The layout also ensures that it does not prejudice the development of the wider allocation and also seeks to maximise the benefit of the canal frontage, while also allowing for a well-designed scheme despite having no active frontages onto the street.

4.14 Each of the buildings is organised as follows:

- Building A

Located within retained gasholder No.5 and containing 12 levels of private residential accommodation, including three levels of set-back penthouses. Ground and sub-ground levels contain residential entrances, retail, commercial, property management, plant and communal residents' facilities. A full height break is proposed, separating the building in two halves from ground (northern side) and first floor (southern side) upwards.

A concierge a ground level, between the two parts of the building, overlooking the central courtyard, serves the entire development. A residents' roof terrace is located on the west of Building A. A recessed colonnade runs around the building at ground level connecting the building to the landscaped public realm.

- Building B

Comprises eight levels of private residential accommodation with ground level containing communal residents' lobby.

One level of basement containing plant and other technical accommodation is shared with the rest of the development. A recessed colonnade runs around the building a ground level connecting the building to the landscaped public realm.

- Building C

Comprises 12 levels of affordable rent residential accommodation with ground level containing communal residents' lobby.

Two levels of basement containing parking, plant and other technical accommodation is shared with the rest of development. A recessed colonnade runs around the building a ground level connecting the building to the landscaped public realm.

- Building D

Comprises 10 levels of private and shared-ownership residential accommodation with ground level containing communal residents' lobby.

Two levels of basement containing ramp to parking, plant and other technical accommodation shared with the rest of development. A recessed colonnade runs around the building a ground level connecting the building to the landscaped public realm.

- Building E

Located within retained gasholder No.2 and containing five levels of private residential accommodation with ground and sub-ground levels containing retail, leisure, commercial and communal residents' facilities.

- 4.15 The scale and massing of the proposed development reflects the site's prominence, character and accessibility. The form and massing of the buildings are varied, ranging from 6 to 13 storeys in height, responding to the height of the to be retained gasholder frames, and circumference, to allow the large existing gasholder frame (no. 5) to be the main, dominant visual feature. The tallest building is Building A with the top three floors designed to be expressed as a 'crown'. The three-storey crown element directly relates to the gasholder top structural tier.

## **Design and Materials**

- 4.16 The scheme will be constructed using a palette of high-quality durable materials with aluminium cladding being the main material across the site. The development's character has been influenced by the industrial character of the site and surrounding area.
- 4.17 The systematic nature of the proposals and scale of the development provides an opportunity to use colour as a means of establishing a site identity as well as giving individual identity to the buildings. The colour palette has been carefully prepared and uses existing materials/colours found in the area as a starting reference point and are consistent with the post-industrial nature of the site, reflecting the changing natural colours of the existing gasholder forms.
- 4.18 The proposed materiality also draws on newer developments such as 'Containerville' on Regent's Canal and recent building refurbishments on the Oval that place primary colours against dark greys and blacks. Outer extruded mesh forms the primary surface envelope for all the buildings and as such will be the primary coloured elements.
- 4.19 There is a legible and consistent approach to the architectural expression of the buildings inside of and outside of the gasholder frames which includes a simple expression of framed structure, floor and wall elements. The balconies are simple steel constructions that are cantilevered and assisted by steel tubes and rods, reminiscent of the existing Victorian structures. These simple, balanced building elements define the main leading edges of each building and are expressed as two-storey lifts within the building height.
- 4.20 The metal balconies are inserted to create articulate the building form whilst generating vertical rhythm. The vertical stacked groups of the balconies create counterpoints that interrupt the simplicity of the main circular façades.
- 4.21 The architecture has been developed to allow the development to be easily read and provide clear expression as:
- a composition of buildings in a townscape setting;
  - as framed, isolated extracted parts that can be seen in long and mid-distance views; and
  - identifiable and singular buildings that can be enjoyed when moving through the landscape and public realm.
- 4.22 Full details are provided within the Design and Access Statement.

## **Inclusive Design**

- 4.23 The proposed development will be designed to provide a fully inclusive environment. The following principles have been incorporated within the design proposals:
- 1 To maximise access to all parts of the proposed development, its facilities and services for residents, visitors and members of staff regardless of disability and as required by local, regional and national policy;
  - 2 To ensure that required standards for accessibility are met at the outset and as part of mainstream inclusive design wherever possible;
  - 3 To design inclusively, which means designing beyond the minimum requirements of the Building Regulations Part M to ensure that all people, regardless of age, sex or ability can use and enjoy the built environment;
  - 4 To address the anticipated, substantial increase of older people in proportion to the working-age population and their future needs;
  - 5 To meet the aims of the Equality Act (2010), where applicable; and
  - 6 To follow design guidance given in relevant British Standards and other currently published good practice guidance about meeting the needs of disabled people and inclusive design.
- 4.24 In accordance with LBTH and London Plan policy at least 10% of dwellings have been designed to be wheelchair user dwellings for residents who are wheelchair users. All other dwellings will be accessible and adaptable (where possible).

## **Access, Servicing and Parking**

- 4.25 The site is situated in a highly accessible area of the City Fringe, being located in PTAL 4-6a (with 1 being the least accessible and 6 the most). The site is approximately 200m from Hackney Road, which provides an essential vehicular route from Cambridge Heath and Shoreditch, alongside the A107 which provides a key route between Hackney and Whitechapel.
- 4.26 Vehicular access to the site will be maintained from Marian Place which will also allow access for pedestrians and cycles. Emma Street will provide pedestrian and cycle access only. A third and new access point will be provided from Corbridge Crescent, which bounds the site to the east, and will facilitate access for pedestrians and cyclists.
- 4.27 There will be an access control point on the perimeter road near the Marian Place access. This will feature retractable bollard for vehicular control and an intercom system which connects to the concierge desk. The retractable access control bollard can be controlled with a key fob which will be issued to blue badge holder residents with allocated parking spaces. For other drivers accessing the development, the intercom system linked to the concierge will be used to gain access into the development.
- 4.28 The on-site perimeter road will facilitate access to the basement car park access situated close to the development's access control point. Access to the basement car park is from Building D. This will enable car park traffic to be intercepted soon after entering the site, thereby minimising vehicular traffic throughout the site. The perimeter road will also enable vehicles to drive to each of the five buildings for deliveries and refuse collection (all of which will be undertaken within the site). Three passing/loading bays are provided along the length of the road and near each building to allow for large vehicles to drive past other vehicles, as well as to deliveries and refuse collection. There will be a turning area and three parking bays located to the south of Building A to accommodate delivery and servicing vehicles close to the concierge desk in Building A.

- 4.29 In terms of car and cycle parking (including accessible parking), the proposed development will utilise an existing gasholder drums to allow ground level to be largely given over to landscaping, public realm and playspace. The parking area will be located over two basement levels, beneath Buildings C and D.
- 4.30 The proposed parking would accommodate 57 car parking spaces, representing the full 10% accessible car parking space requirement. Of these spaces, 17 (3%) will be provided as accessible spaces with the remaining 40 spaces (7%) to be large spaces available for the use of non-disabled residents until such time that demand arises for use of the full 10% of spaces by accessible users.
- 4.31 976 secure cycle spaces for the residential dwellings will be provided plus 14 visitor spaces (provided a Sheffield Stands) in the public realm. All the resident cycle parking spaces will be secure and covered and located within the shared basements of Buildings C and D. The long-stay cycle parking provision will be separated and arranged into compartments. Cyclists from Buildings C and D will be able to access their bikes within the basements via lifts/stairs located within each Building. Cyclists from other buildings will be able to access the basements via the external lift/stairs located adjacent to Buildings C and D.
- 4.32 The proposed non-residential uses will comprise 40 long-stay cycle parking spaces for staff and 73 short-stay cycle parking spaces for visitors. The staff cycle parking provision will be secure and covered. A cycle store comprising 24 cycle parking spaces (provided with 12 two-tier racks) will be provided at ground level within Building A. The remaining staff cycle parking spaces will be provided in a covered external shed near Building E. The visitor spaces will be provided in the form of Sheffield stands in the public realm.

## **Servicing**

- 4.33 Separate refuse areas are provided for the residential dwellings and the commercial uses. Residential bin stores are located at ground floor level of each building (except Building A) and are accessible from each core. For Building A, 22 bins will be provided within small stores in the basement, with the main bin store at ground level. Residents will only use the stores at basement level to dispose of waste. When the basement bins are filled, they will be moved to the main store at ground floor by members of the estate management company via a goods lift and will be swapped with empty bins from the store at ground level. The Council's waste operatives will only need to access the ground floor bin store.
- 4.34 Commercial bin stores are located at the eastern end of Building A and will be managed by the estate management company.
- 4.35 Refuse vehicles will access the site from Marian Place and will utilise the on-site perimeter road to perform waste collection. Waste operatives will park their vehicle within the nearest layby or suitable stopping point, wheel the bins to the vehicle for collection and return the bins to their original location after the waste has been collected. Each layby/suitable stopping point is located within a 10m distance from the waste store.
- 4.36 Deliveries and servicing associated with all proposed uses will be undertaken within the site. Delivery vehicles will access the on-site perimeter road from Marian Place and will be directed to the correct building at the intercom by a concierge desk and through wayfinding/signage. The majority of deliveries to the residential development (expected to be ecommerce) will be delivered at the concierge desk in Building A.
- 4.37 For deliveries of takeaway food, food shopping or bulky goods to all residential dwellings, the delivery vehicles will be directed to the relevant building at the intercom and will park within the nearest layby to perform the drop-offs (or within parking bays for Building A).

- 4.38 Deliveries for the commercial uses will be directed to the correct building at the intercom and drop-offs will be performed within the nearest layby/parking bay.

### **Public Realm, Landscaping and Amenity Space**

- 4.39 A comprehensive landscaping scheme has been developed for the site. The layout of the proposed development is structured around a clear and connected public realm network and provides extensive amenity space in the form of open space around the buildings at ground floor level. The landscape design proposes to split the 0.71 hectares of public open space into seven-character areas. These can be seen in Figure 4.1 and comprises the following:
- 1 Central Lawn – an area of consolidated open space which can be used flexibly and suitable for events and community gatherings
  - 2 PRS Grove – this will bring the retained Cadent equipment into the public realm landscape proposals and will include combination of fixed and flexible furniture and a tree canopy.
  - 3 Canal Edge – this will be upgraded as levels are rationalised where subsidence has taken place. Landscape will include large and small tree groves, specimen trees and planted buffers.
  - 4 Woodland Ring – this will be provided between buildings B and C and C and D and will comprise a series of meandering paths and garden seating within dense trees planting while maintaining clear views through to central lawn.
  - 5 Local Play Area – this will form an extension to the central open space and will comprise a soft-fall play area contained within hedging.
  - 6 Home Zone – this will be a pedestrian priority space with a 50mm high kerb to separate vehicles and pedestrians
  - 7 Sunken Courtyard – this is located within Building A and will be accessible to residents and non-residential tenants of the consolidated basement commercial space within the building.
- 4.40 Biodiverse roofs will also be provided on all roofs with the exception of the western half of building A.

Figure 4.1 Proposed Landscape Character Areas



4.41 All of the landscaped areas (excluding the Sunken Courtyard and an area of the Woodland Ring) will be publicly accessible, however, clever design and planting will be deployed to ensure appropriate levels of amenity for the occupiers of the residential dwellings can be secured.

4.42 Regarding children’s playspace, all the required playspace will be delivered on site within the landscape proposals. Doorstop playspace will be provided in the Woodland Ring, incorporating playable trails which can be overlooked from carefully located breakout spaces. For children aged between 4-10 years, a designated play area is proposed. Other features include sound play areas suitable for younger children, a central lawn space suitable for pop-up sports and a fitness trail looping around the site that connects a number of exercise stations. A total of 2,697sqm playspace is proposed as set out in Table 4.4.

Table 4.4 Required and Proposed Children’s Playspace

Age Group	Child Yield (all tenures)	Required Playspace (based on 10sqm per child)	Proposed Playspace	
			Amount provided	Location
0-3 years (doorstop play)	65.9	659	660sqm	In Woodland Ring between Buildings B, C and D
4-10 years (local play)	72.7	727	992sqm	Central Lawn and Home zone
11-15 years (youth play)	51.6	516	658sqm	Across site
16-17 years (youth play)	21.8	218	387sqm	Across site
<b>Total</b>	<b>212</b>	<b>2,120</b>	<b>2,697sqm</b>	

4.43 As part of the redevelopment of the site, it is necessary to retain the existing PRS as critical piece of its remaining infrastructure. Due to the prominence of the PRS to the main entrance from the site from Marian Place, a landscape design solution has been devised to incorporate it into the public realm and the site-wide circular/radial layout. It is proposed a sculptural screen will conceal the retained PRS equipment and will be formed of a reflective material which will then be surrounded on two sides by a grove of trees and key pedestrian access routes. A low-level water feature is also proposed to complete the circular shape.

4.44 Further details on the landscape proposals can be found in the Design and Access Statement.

4.45 In addition to the wider landscape proposals, each dwelling within the scheme would have a dedicated private amenity space in the form of a balcony (excluding the courtyard studios in Building A which have been oversized and provided with a Juliet balcony). The balconies would range in size dependent on the number of people within each dwelling in line with London Plan guidance.

## **Energy and Sustainability**

4.46 The proposals will maximise the potential carbon savings which can be achieved through the provision of:

- 1 A highly efficient building fabric;
- 2 Efficient building services plant, including providing high efficiency air handling plant with heat recovery and low specific fan power;
- 3 100% low energy lighting and maximised use of LED and low energy fixtures;
- 4 Heat network provided by Air Source Heat Pumps, Water Source Heat Pumps and high efficiency back-up boilers; and
- 5 Roof mounted PV panels.

4.47 Overall, the development will achieve the following carbon reductions after following the Energy Hierarchy of Lean, Clean, Green when compared to Part L 2013 using SAP 10 carbon factors:

- Residential Element – 45.77%
- Non-Residential Element – 24.20%
- Whole Proposed Development – 41.39%

4.48 The figures are the reduction in carbon emissions compared to each respective baseline.

4.49 The development meets and exceeds the carbon reduction target of 35% set by GLA and the carbon reduction target of 45% set by the Local Plan. The non-residential elements have maximised efforts to achieve targets set by Tower Hamlets and will achieve BREEAM 'excellent'.



## 5.0 **Planning Policy Context**

### **Introduction**

5.1 This section of the report outlines national, strategic and local planning policy and guidance of relevance to the development. An assessment of the planning application against these policies is provided in Section 6.0.

### **National Planning Policy Framework (2019)**

5.2 The National Planning Policy Framework (NPPF) (adopted February 2019) sets out the Government's planning policies for England. It is a material planning consideration in decision-making. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development.

5.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: 'economic' to help build a strong and competitive economy; 'social' to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and 'environmental' in protecting and enhancing the environment.

5.4 Paragraph 11 of the NPPF requires LPAs to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states:

*"For decision-taking this means:*

*approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...."*

5.5 Paragraph 59 supports the objective of significantly boosting the supply of homes and for a sufficient and variety of land comes forward where it is needed. The size, type and tenure of housing needed for different housing groups should be assessed and reflected in policy as well as the need for affordable housing. Paragraph 63 goes on to support the re-use of brownfield land.

5.6 The NPPF states that 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 (Paragraph 80). To do this, Local Authorities should have regard for economic development and regeneration and identify strategic sites for inward investment (Paragraph 81).

5.7 Chapter 9 of the NPPF promotes sustainable transport. In paragraph 103, it is stated that 'significant development should 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'. Paragraph 104 states that planning policies should:

- 1 *Support an appropriate mix of uses across an area, and within large scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*

- 2 *Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- 3 *Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- 4 *Provide for high quality walking and cycling networks and supporting facilities such as cycle parking*
- 5 *Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation*

5.8 Chapter 11 of the NPPF relates to the effective use of land. Paragraph 118 sets out several principles that should be applied. One of the principles is that planning decisions should ‘*encourage multiple benefits from both urban and rural land, including through mixed use schemes*’. Paragraph 123 seeks to ensure that where there is an existing or anticipated shortage of land for meeting identified housing need, developments must make optimal use of the potential of each site.

5.9 Paragraph 124 states 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*”. Several key principles are identified for achieving good design, including:

- 1 *to function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- 2 *be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- 3 *to be sympathetic to local character and history, including the surrounding built environmental and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- 4 *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;*
- 5 *to 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*
- 6 *to 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.*

5.10 In paragraph 174 of the NPPF, it states that LPAs should aim to conserve and enhance biodiversity when determining applications. Paragraph 175 sets out several principles that should be applied. One of the principles is that ‘*opportunities to incorporate biodiversity improvements in and around developments should be encouraged*’.

## **Statutory Development Plan**

5.11 The statutory development plan relevant to the site comprises the London Plan (as amended 2016), the Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits (adopted January 2020). The development plan is supplemented by a series of adopted Supplementary Planning Documents and Guidance notes (SPDs/SPGs).

- 5.12 The Mayor of London is in the process of adopting a new London Plan and examination hearings for this concluded in May 2019. The Mayor published a consolidated version of the Plan in July 2019 which picked up all of the Mayor's suggested changes. The Panel of Inspectors appointed by the Secretary of State to examine the draft London Plan issued their report and recommendations to the Mayor on 8<sup>th</sup> October 2019. The Mayor published an 'Intend to Publish' version of the London Plan in December 2020; this has now been sent to the Secretary of State alongside a schedule of the Panel's recommendations and the Mayor's response to them. A response from the Secretary of State is expected by the end of February 2020.
- 5.13 While the new London Plan has not yet been adopted, the GLA is beginning to use it in the development management decision making process as a material consideration. Given the progress of the Plan through the examination process and the likelihood the Plan will be adopted by the time the application is determined, the emerging London Plan now carries significant weight.
- 5.14 The London Plan (adopted and emerging) is also supplemented by a series of adopted Supplementary Planning Documents and Guidance notes (SPDs/SPGs).

### **London Plan (2016)**

- 5.15 Within the London Plan, guidance is given with regard to the provision of housing for London. Policy 2.13 identifies Marian Place as falling within the City Fringe/Tech City Opportunity Area (OA). Development proposals should seek to nurture the employment, business and creative potential of the digital-creative sections and ensure that suitable commercial floorspace, supporting uses and related infrastructure is available to meet the growing needs. The Plan sets a minimum housing target of 8,700 within the City Fringe/Tech City OA and an indicative employment capacity of 70,000. Table 3.1 of the London Plan further identifies an annual monitoring target for the wider Tower Hamlets area of 3,931 between 2015-2025.
- 5.16 The Plan sets out housing policy with regards to affordability, tenure, mix and quality. Policy 3.11 states that Affordable Housing should be split 60:40 between social rent and intermediate housing. Policy 3.4 states that given the site is located in a PTAL 3-6a, a density of 300-650hr/ha and 650-1100 hr/ha applies. Policy 3.5 states that the design of all new housing developments should enhance the quality of local places, take into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- 5.17 Policy 4.1 Developing London's Economy highlights that the Mayor will work with partners to promote and enable the continued development of strong, sustainable and increasingly diverse economy across all parts of London. Annex 1 of the London Plan identifies a strategic objective to provide 70,000 jobs within the City Fringe/Tech City OA. Policy 4.12 further requires strategic development proposals to support local employment, skill development and training opportunities.
- 5.18 Policy 4.6 also seeks to support the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises, noting the cultural, social and economic benefits they offer to residents, workers and visitors.
- 5.19 Policy 7.6 (Architecture) states that buildings and structures should:
- be of the highest architectural quality
  - be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

- not cause unacceptable harm to the amenity of surrounding land and
- buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.
- incorporate best practice in resource management and climate change mitigation and adaptation
- provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- be adaptable to different activities and land uses, particularly at ground level
- meet the principles of inclusive design
- optimise the potential of sites

5.20 Policy 7.1 (Lifetime Neighbourhoods) outlines that in their neighbourhoods' people should have a good quality environment in an active and supportive local community with the best possible access to services infrastructure and transport to wider London. Furthermore, development should be designed so that the layout, tenure, and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

5.21 A full list of the London Plan policies relevant to this application are provided within Appendix 1.

### **Emerging London Plan (2019)**

5.22 While the new London Plan has not yet been adopted, the Plan is sufficiently advanced to carry a significant degree of planning weight and so the development proposals have also been assessed against the draft policies.

5.23 Policy SD1 identifies Marian Place as falling within the City Fringe/Tech City Opportunity Area with an indicative minimum housing target of 15,500, an increase from the previous London Plan of 6,800 homes. Opportunity Areas are expected to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. This policy identifies an indicative guideline to provide 50,500 jobs (a reduction from 70,000). Policy GG2 also requires development to make the best use of the land and sets out that the development of brownfield land, particularly in OAs, on surplus public sector land should be encouraged.

5.24 Chapter 6 discusses the London Economy further. Policy E2 discusses low cost business space. Development proposals for new B1 business floorspace greater than 2,500 sqm (GEA) should consider providing a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

5.25 Policy E3 seeks to secure the provision of affordable workspace for social, cultural or economic development purposes. Part B(2) of the policy suggests consideration should be given to the need for affordable workspaces in areas identified in a local development plan where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones). Policy E8 (Sector growth opportunities and clusters) also requires the evolution of London's diverse employment sectors to be supported and to ensure the availability of suitable workspaces. Supporting text to this policy (paragraph 6.8.3) notes in the City Fringe, the Tech City cluster will be supported as one of London's nationally-significant office locations and should be complemented by Development Plan policies to enable entrepreneurs to locate and

expand there and to provide the flexibility and range of space that this sector needs, including affordable space.

5.26 Table 4.1 (referred in Policy H1 of the emerging London Plan) sets a ten-year housing target for LBTH of 34,730 dwellings.

5.27 With regards to affordable housing, Policy H5 sets a strategic target of 50% of all new homes being genuinely affordable. Policy H6 sets out a threshold approach for major development proposals which trigger affordable housing requirements. The threshold level of affordable housing on gross residential development is initially set at a minimum of 35% or 50% for public sector land where there is no portfolio agreement with the Mayor. Supporting paragraph 4.5.7 further states that due to the difference in values between industrial and residential development, residential development proposals that would result in a net loss of industrial floorspace capacity (including former utility sites) are expected to provide at least 50% affordable housing to follow the Fast Track Route. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing.

5.28 Policy D2 states density of development proposals should be considered and be linked to the future provision of future planned levels of infrastructure (rather than existing levels) and be proportionate to the site's connectivity and accessibility.

5.29 Policy D3 requires that all development must make the best use of the land by following a design-led approach that optimises capacity and responds to the site's context. Development proposals are required to consider form and layout, experience and quality and character.

5.30 With regards to design, Policy D4 state that development proposals must consider:

- Design analysis and development certainty
- Design scrutiny
- Maintaining design quality

5.31 On transport, Policy GG2 sets a strategic target of 80% of all journeys using sustainable travel, as well as using new and enhanced public transport links to unlock growth in their plans. Policy T6 states that car-free development should be the starting point for well-connected sites by public transport, with developments elsewhere designed to provide the minimum necessary parking ('carlite').

5.32 With regards to cultural use, Policy HC5 states in part A5 that OAs and large-scale mixed-use developments should include new cultural venues and/or facilities and spaces for outdoor cultural events.

5.33 Policy SI3 regards Energy Infrastructure. The policy states large-scale development proposals such as those within Opportunity Areas should establish future energy requirements and infrastructure arising from the development at an early stage.

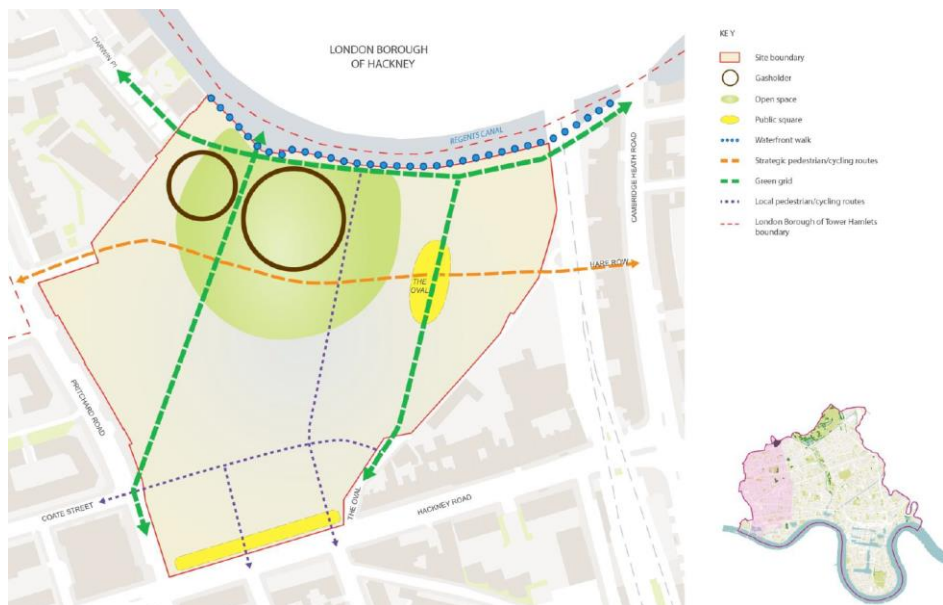
5.34 A full list of the new London Plan policies relevant to this application are provided within Appendix 1.

### **Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2019)**

5.35 As of the 15 January 2020, LBTH have adopted its new Local Plan; Local Plan 2031: Managing Growth and Sharing Benefits. This replaces the Core Strategy (2010) and Managing Development Document (2013).

5.36 The Local Plan allocates the Marian Place Gasholder site and The Oval for redevelopment to provide housing and employment (suitable for use by SMEs, start-ups and creative and tech industries) uses. The land contained within the site allocation can be seen in Figure 5.1.

Figure 5.1 Marian Place Gas Works and The Oval Site Allocation



Source: LBTH Local Plan

5.37 As part of the development proposals, one hectare of strategic open space should be provided. A number of design principles are set out in the policy, including those relating to the Regent's Canal Conservation area, the existing gasholder frames and the maximising the provision of family homes. These are covered in more detail in the next section.

5.38 Policy S.SG1 (Areas of Growth and Opportunity within Tower Hamlets) notes that development will be supported where it will contribute towards delivering the Local Plan vision and objectives through good design, preserving or enhancing the character and setting of an area and will not have unacceptable impacts on the natural and historic environment. Of note, is delivering mixed and balanced communities.

5.39 Regarding developer contributions, Policy D.SG5 states that for site allocations the policies set out in the plan may be applied flexibly to ensure the sites are viable and deliverable.

5.40 Applications for new developments should consider the design policies including Policy S.DH1 (Delivering High Quality Design) which requires development to meet the highest standard of design, layout and construction, Policy D.DH2 (Attractive Streets, Spaces and Public Realm) which requires developments to contribute to improving and enhancing connectivity, permeability and legibility and contributing to the public realm and Policy S.DH3 (Heritage and the Historic Environment) which considers the preservation of designated and non-designated heritage assets.

5.41 During the Local Plan period, LBTH will seek to secure the delivery of 58,965 new homes across the Borough (equating to at least 3,931 new homes per year) between 2016 and 2031. Policy S.H1 also seeks to deliver an overall target of 50% affordable housing and for developments providing new housing to deliver a mix of unit sizes and tenures to meet local need. The affordable housing and housing mix is set out in Policy D.H2 Mixed and Balanced Communities.

- 5.42 Chapter 5 of the Local Plan sets out the Council’s plan for delivering economic growth. Policy S.EMP1 (Creating Investment and Jobs) designates Cambridge Heath and the surrounding area (including the Marian Place Gasholder site) as a Local Employment Location (LEL) which it notes is suitable for providing a range of office, industrial and studio workspaces, meeting the needs of businesses serving a more local need, start-ups, small-to-medium enterprises and creative industries. Policy D.EMP2 (New Employment Space) allows new employment space to be provided in designated employment locations or identified Site Allocations.
- 5.43 Chapter 8 sets out the Council’s strategy regarding the provision of open and water spaces, including Policy D.OWS4 (Water Spaces) which requires development within or adjacent to water spaces to demonstrate there will be no impact on the existing water spaces network or its openness. Other environmental policies such as Policy S.ES1 (Protecting and Enhancing our Environment), Policy D.ES2 (Air Quality), Policy D.ES3 (Urban Greening and Biodiversity) and Policy D.ES4 (Flood Risk) are set out in Chapter 9.
- 5.44 Chapter 9 also includes policies relating to sustainable urban drainage (Policy D.ES5), carbon dioxide emissions (Policy D.ES7), noise and vibration (Policy D.ES9) and overheating (Policy D.ES10). Of note is Policy D.ES8 (Contaminated Land and Storage of Hazardous Substances) which states where development is proposed on contaminated land or potentially contaminated land, a desk study and site investigation in line with current guidance is required and remediation proposals agreed to deal with the contamination before planning permission is granted.
- 5.45 Policies relating to transport and connectivity are set out in Chapter 11.
- 5.46 A full list of the new Local Plan policies relevant to this application are provided within Appendix 2.

## **Other Material Considerations**

### **GLA City Fringe Opportunity Area Planning Framework (December 2015)**

- 5.47 The City Fringe Opportunity Area is defined in the London Plan as being approximately 901 hectares of land covering parts of the London boroughs of Islington, Tower Hamlets and Hackney. It contains significant development capacity in relatively central areas to support London’s financial and business services and also encourage the diverse cluster of digital-creative businesses in an expanding “Tech City”.
- 5.48 The Opportunity Area is split into ‘Core Growth Area’ and ‘Hinterland’. The Core Growth Area should have an ongoing supply of employment floorspace and some older, affordable stock in the Core Growth Area. The Hinterland, which the development site sits within, is a largely residential area and the Opportunity Area continues to promote residential development. Some employment floorspace may be appropriate but proposals should be more residential in nature.
- 5.49 The indicative employment capacity for the area is 53,000 sqm and the minimum new homes to be built is 15,000.
- 5.50 The following strategies are applied in the City Fringe Opportunity Area:
- 1 *Strategy 1:* In order to ensure a consistent and coordinated approach across the three boroughs and provide a basis for policy implementation, the City Fringe Opportunity Area has an indicative planning boundary.
  - 2 *Strategy 2:* A number of strategies are suggested in the framework with the aim of protecting a quantum of floorspace needed for growth.

- 3 *Strategy 3:* The core and hinterland have been defined in a way which helps to strike a good balance between employment and residential uses.
- 4 *Strategy 4:* The City Fringe has a special and important mix of night time economy, small independent shops, historic character, retail and expanded business clusters, which must be supported.
- 5 *Strategy 5:* Supporting pop-ups and temporary uses, especially as flexible uses of vacant space.
- 6 *Strategy 6:* Provisions for cycle parking, given the high prevalence of cycling in the City Fringe.

### **National Planning Practice Guidance**

5.51 The National Planning Practice Guidance was initially published in March 2014 and provides detailed guidance on how to apply the policies contained within the NPPF, with reference to relevant legislation and other guidance. Through the publication of the 2018 National Planning Policy Framework, the Government is now in the process of updating its Planning Practice Guidance.

5.52 An updated Planning Practice Guidance note on Viability has been published. It confirms that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage (paragraph 007). It goes to confirm that the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and viability evidence underpinning the plan is up to date, any change in site circumstances since the plan was brought into force, and the transparency of assumptions behind evidence submitted as part of the viability assessment (paragraph 008).

### **National Design Guidance (October 2019)**

5.53 The national design guide was published on 1 October 2019 and sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is intended to form part of the government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

### **Supplementary Planning Documents/Guidance**

#### **Mayor of London Affordable Housing and Viability SPG (August 2017)**

5.54 This SPG focuses on affordable housing and viability and provides guidance on how the Mayor seeks to achieve the long-term strategy aim of half of all new homes in London being affordable.

5.55 The SPG's main aim is to accelerate overall housing delivery and increase the amount of affordable housing delivered through the planning system. It seeks to embed the requirement for affordable housing into land values, make the viability process more consistent and transparent, and speed up the planning process for those schemes which are delivering more affordable homes.

5.56 The SPG also sets out how public subsidy should be used to ensure additional affordable homes are delivered, above that which can be secured through the planning system alone. Its approach is integrated with the approach to funding set out in the Mayor's guidance to his Affordable Homes Programme 2016-21.



### **Mayor of London Housing SPG (March 2016)**

- 5.57 This Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan<sup>1</sup> and the 2016 Minor Alterations to the Plan (MALP). It replaces the 2012 Housing SPG.
- 5.58 Part 2 of the SPG sets out housing quality and updates London housing standards to reflect the implementation of the Government's national Technical standards (2015).

### **Affordable Homes Programme 2016-21 Funding Guidance (November 2016)**

- 5.59 This document seeks to help increase the supply of new homes and the number of those that will be genuinely affordable and provides guidance on how developers can secure part of the £3.15 billion fund from the Government for new affordable homes. It sets out the three products that it expects the programme will be primarily composed of (London Affordable Rent; London Living Rent; and London Shared Ownership), available routes for affordable housing funding, the bidding procedure and how each bid will be assessed.

### **Sustainable Design and Construction – The London Plan Supplementary Planning Guidance (April 2014)**

- 5.60 This guidance document sets out various standards that should be applied to all new developments, along with a second tier of the Mayor's 'preferred' standards. The essential standards are based on current Building Regulations, the targets set out in the Mayor's strategies and current good industry practice. The Mayor's preferred standards indicate approaches that can be followed but which are not policy requirements.

### **Mayor of London Economic Development Strategy (December 2017)**

- 5.61 The Economic Development Strategy sets out the Mayor's ambitions for London. It includes a number of objectives of particular relevance, including (1) to promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity; and, (2) to ensure that London has the most competitive business environment in the world.

### **Accessible London: Achieving an Inclusive Environment SPG (October 2014)**

- 5.62 This SPG provides guidance on the implementation of London Plan Policies 7.1 and 7.2, implementing inclusive design principles effectively, and on creating an accessible environment in London, with particular emphasis on the access needs of disabled and older people.

### **London View Management Framework SPG (March 2012)**

- 5.63 The London View Management Framework is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.

### **Guidance on Tall Buildings (CABE and English Heritage) 2007**

- 5.64 This acknowledges that cities and their skylines evolve. In the right place, tall buildings can make positive contributions to city life. They can be excellent works of architecture in their own right; some of the best post-war examples are now listed buildings. Individually, or in groups, they affect the image and identity of a city as a whole. In the right place they can serve as beacons of regeneration and stimulate further investment.

- Criteria for evaluating tall building proposals are set out in this document and include:

- Relationship to context
- Relationship to transport Infrastructure
- Architectural Quality
- Sustainable Design and Construction
- Contribution to public space and facilities
- Effect on local environment
- Contribution made to permeability
- Well-designed environment

5.65 A draft of a revised version of this guidance was issued in October 2014 and no further progress has been undertaken since. This is similar to the above and adds that Outline applications are only likely to be justified in exceptional cases where the principle of a tall building is to be established as an important element within a robust and credible masterplan to be developed over a long period of time. If an outline application is sought in these circumstances it is important to ensure that the parameters for development are derived from a thorough urban design analysis to demonstrate impact.

**Mayor of London – Shaping Neighbourhoods: Character and Context SPG (June 2014)**

5.66 This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. The SPG aims to provide guidance for developers and their consultants in preparing planning applications, so that an understanding of character can help achieve the right development in the right place. The document provides a detailed definition of “character”:

*“Character is created by the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.”*

**Mayor of London – Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012)**

5.67 The guidance supports the implementation of the London Plan Policy 3.6 on ‘Children and Young People’s Play and Informal Recreation Facilities,’ and other policies on shaping Neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on Lifetime Neighbourhoods. Of particular relevance, it provides benchmark standards on play requirements that can be used as a reference to guide boroughs in the development of their own local standards and to secure places to play in existing and new housing developments; and provides updated child yield figures for boroughs and developers to assess child occupancy and play space requirements. The spreadsheet

**LBTH Planning Obligations SPD (2016)**

5.68 The planning obligations SPD was adopted on 11 January 2012 and amended on 6 September 2016. The SPD explains LBTH’s approach to planning obligations and aims to clarify the types of planning obligations that may be sought and the methodology for calculating the amount of these obligations.

**LBTH Development Viability SPD (2017)**

- 5.69 The Development Viability SPD was adopted on 2 October 2017 and provides guidance as to how Development Plan policies should be applied in a development viability context when determining planning applications. It aims to provide greater clarity to both applicants and the general public and ensures that the principles of sustainable development are at the forefront of decision-making. The SPD seeks to ensure the assessment of the viability of planning applications is efficient, consistent and transparent.
- 5.70 The development plan must be looked at as a whole, taking into account an assessment of material considerations. This assessment is provided in the following section.

## 6.0 **Planning Policy Assessment**

6.1 The relevant planning issues which have been considered include:

- 1 Principle of development;
- 2 Housing – including quantum, distribution, mix and affordable housing statement;
- 3 Urban and Inclusive Design – including layout and legibility, height and scale, inclusive design, townscape and visual impact;
- 4 Residential Quality;
- 5 Heritage;
- 6 Open Space, Public Realm and Landscaping;
- 7 Transport, Access and Parking;
- 8 Energy, Sustainability and Overheating; and
- 9 Environmental Issues.

### **Principle of Development**

- 6.2 As noted elsewhere, the gasholders are now surplus to requirement and are no longer required for the storage of gas. The site is therefore largely redundant, other than the PRS that is the only operational piece of gas infrastructure remaining at Marian Place. While utilities sites are defined as industrial land under emerging London Plan Policy E4, the principle of no net loss of floorspace capacity when assessing proposals against policies E4, E6, and E7 does not apply to sites previously used for utilities infrastructure (see paragraph 6.4.8).
- 6.3 It is recognised within the NPPF (2019) that new homes are needed, and that effective use should be made of previously developed land in sustainable locations. Paragraphs 59-66 of the NPPF set out the policies seeking to boost housing supply and ensure delivery of a wide choice of high quality homes.
- 6.4 The Marian Place Gasholder site is identified within an Opportunity Area (OA) in the adopted and emerging London Plan. Policy 2.13 states that development in OAs is expected to optimise residential and non-residential outputs and contain a mix of uses. London Plan paragraph 2.58 states that OAs are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility, which is echoed in the supporting text to draft London Plan Policy SD1. Paragraph 2.0.4 confirms that OAs are expected to make particularly significant contributions towards meeting London's housing needs. The draft London Plan identifies the City Fringe/Tech City OA as having the potential to deliver 15,500 new homes and 50,500 new jobs.
- 6.5 The site is also located in the LBTH Local Plan as within the City Fringe opportunity area. Policy S.SG1 confirms new development within the borough will be directed towards opportunity areas (including the City Fringe) and highly accessible locations along transport corridors.
- 6.6 The site is allocated for redevelopment for residential and employment uses in LBTH's Local Plan (Site Allocation 1.3).
- 6.7 It is considered that due to the location of the site in an OA, its allocation in the Local Plan for redevelopment for housing and employment uses and the redundant nature of its current function, the principle of redevelopment is acceptable and in accordance with the Development Plan.

6.8 The acceptability of the proposed uses is discussed below.

### **Housing**

6.9 Adopted London Plan Policy 3.3 and draft London Plan Policy H1 seeks to increase London's supply of housing and, in order to do so, sets each borough a housing target. The London Plan sets Tower Hamlets' target at a minimum 39,314 between 2015 and 2025 (equating to 3,931 additional homes per year). The draft London Plan updates these figures. Following the examination of the emerging London Plan, the Panel recommended a number of changes, one of which was to modify the ten-year housing targets in the Plan. This revised the housing requirement for LBTH to 34,730 over ten years.

6.10 The LBTH Local Plan contains the previous London Plan figure of 3,931 new homes per year.

6.11 The NPPF notes that planning policy and decisions should “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*” (paragraph 118(c)). The reuse of brownfield sites for housing is also prioritised in the adopted and emerging London Plan.

6.12 Of specific relevance is the sites' allocation in the LBTH Local Plan for residential and employment uses. The proposed development will deliver 555 new homes, making a significant contribution to Tower Hamlets' housing need and would regenerate a sustainable, brownfield site. It also offers an opportunity to make efficient use of the land, in line with the aspirations of the NPPF.

6.13 The principle of residential development in this location is acceptable.

### **Employment**

6.14 Local Plan allocation SA1.3 sets out that the site should deliver housing and employment (including a range of new units suitable for the needs of SMEs, start-ups and creative and tech industries).

6.15 The application site is part of a larger area allocated in the adopted and Local Plan for housing and employment offering ‘a range of new units suitable for the needs of small-medium enterprises, start-ups and creative tech industries’. The Local Plan is clear that the application site does not currently accommodate any employment floorspace and, therefore, no floorspace needs to be re-provided. All employment floorspace proposed as part of the application proposal will be a net gain. Any redevelopment of the existing employment floorspace within the remainder of the site allocation will need to re-provide the existing employment floorspace as a minimum as part of any proposal.

6.16 The site is also located within the Cambridge Heath Local Employment Location (LEL). Local Plan Policy S.EMP1 sets out that development in this location should support, protect and enhance the role and function of the borough's designated employment locations.

6.17 The current scheme seeks permission for 4,182sqm of non-residential floorspace within a range of use classes to include A1-A4, B1 and D. This range is to allow for flexibility across the site and increase their attractiveness to potential occupiers. As mentioned in several pre-application meetings, by their nature it is not possible to seek formal commitment from employment enterprises or predict specific demand so far in advance of construction and completion (anticipated to be five to six years). The range of uses is, therefore, necessary to provide flexible space that could be appropriate for a range of occupiers particularly given current market conditions and the well documented challenges facing all development sectors.

- 6.18 The employment generating floorspace is provided at ground floor level in all buildings and at basement level in Buildings A and E within the two retained gasholders. St William have held discussions with local enterprises and agents to understand their user requirements and to build these into the proposals from inception. This engagement has reiterated the importance of the spaces at Marian Place being flexible and varied. As some of the space will be larger than that provided at ‘Containerville’, which provides workspace suitable for start-up companies and small businesses, the commercial offer proposed will provide complimentary floorspace to that already existing. This diversity in commercial floorspace allows for companies which have established a base in the area to remain, thus retaining its creative environment.
- 6.19 Consideration has been given to the provision of employment floorspace at first floor level, as per officer suggestion, however, this is not practicable and has not been pursued. To facilitate this, it would require separate cores, add significant costs, and reduce the number of new homes, including affordable homes, to be delivered. This would in turn detrimentally impact the viability of the scheme and lessen the prospect of both gasholders no.2 and no.5 being retained. It is not considered that employment floorspace at upper levels is required to create a vibrant and locally distinctive environment any more than that proposed. The provision of upper floor employment uses does not outweigh the impacts it would have on the scheme.
- 6.20 In this context, St William are also conscious that the current application site is just one part of a larger area allocated for development by the Council for a mixed-use development. As such, there are many other opportunities to provide employment floorspace around the site to create the critical mass that the Council seek for the locality and offering a vibrant, active space, at the heart of the development site, for leisure and recreational uses focused around the central area of public open space.
- 6.21 The current proposals by St William for the application site would meet the objectives of the Site Allocation, which following receiving planning permission and construction, would act as the catalyst for change in the area and meet the aspirations of the Council.

### **Retail, Food and Beverage Provision**

- 6.22 London Plan Policy 4.7 confirms retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be well integrated with the existing centre and public transport. Proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact. This is reiterated in draft London Plan Policy SD7.
- 6.23 Local Plan Policy D.TC3 also confirms outside of the borough’s town centre hierarchy, new retail development will be subject to a sequential test. It goes on to set a local impact threshold whereby an impact assessment is required where proposals exceed 200sqm gross floorspace. Supporting paragraph 11.32 also states:
- “The Central Activities Zone and Tower Hamlets Activity Areas have a unique role in the town centre hierarchy. New retail uses may be appropriate in these areas, especially those of a smaller scale, where they would not detrimentally affect the vitality and viability of Major, District or Neighbourhood Centres. We take a judgement-based approach to proposals within these areas and a sequential test and/or impact assessment may still be required where a proposal has a potentially adverse impact on a Major, District or Neighbourhood Centre.”*
- 6.24 The Retail Impact Assessment (RIA) prepared and submitted with this application identified that there was a specific market and locational need for the proposed non-residential floorspace to be provided within the application site. The facilities proposed can only be located at the application site as they are intended to serve the new residents of the proposed development

and the local catchment area. Other sites away from the site would not be suitable or viable, and therefore the development complies with the sequential test (as required by Local Plan Policy D.TC3).

- 6.25 Notwithstanding this commercial rationale, the analysis of potential alternative sites demonstrates that there are no available, suitable and viable sites that can accommodate the proposed non-residential element of the development. As a result, the application site is the most sequentially preferable site to accommodate the proposed development and the sequential test is passed.
- 6.26 The retail assessment set out in the RIA also demonstrates that the proposed non-residential elements of the development will not have a significant adverse impact on any designated centres. Furthermore, given the location-specific nature of the proposals, the proposed development is not expected to adversely affect the development opportunities of other sites in the defined centres.
- 6.27 Overall the development is in line with relevant national, strategic and local retail and town centre planning policy and is acceptable in retail/town centre planning terms. Furthermore, it is considered that the provision of retail (and office/leisure) floorspace within Buildings A and E at ground floor will ensure these areas are activated and will add value to the new publicly accessible space.

### **Summary**

- 6.28 The principle of the proposed uses is considered acceptable on the basis of national, London and Local Plan policy which identifies the need to increase the supply of new homes and jobs and make the best use of highly accessible, urban, brownfield sites.

## **Housing**

### **Quantum and Dwelling Mix**

- 6.29 The London Plan promotes developments that offer genuine housing choice. London Plan Policy 3.8 indicates that new developments should offer a range of housing choices in terms of the mix of housing sizes and types, having regard to local housing need. Emerging London Plan Policy H10 confirms that schemes should generally consist of a range of unit sizes, having regard to (inter alia), the range of housing need and demand, the need to deliver a range of unit types at different price points and the nature and location of the site.
- 6.30 Local Plan Policies S.H1 and D.H2 require a mix of unit sizes and tenures to meet local need.
- 6.31 In addition, Policy D.H2 states the developments are required to provide a mix of dwelling sizes in accordance with housing need. The supporting text to this policy notes, in paragraph 4.37, that where a development proposes to deliver at least 35% affordable housing (to use the fast track approach) and in exceptional circumstances (for example where developments propose to deliver significant social infrastructure on-site), LBTH will consider a different housing mix (subject to having regard to the listed criteria) (see bullets to paragraph 9.37).
- 6.32 Site Allocation Policy 1.3 (Marian Place Gas Works and The Oval) requires development to maximise the provision of family homes.
- 6.33 The proposed housing mix on a unit basis is summarised in Table 6.1.

Table 6.1 Proposed Housing Mix

Unit Type	Market		Intermediate		Affordable Rent		Total	
	No.	%	No.	%	No.	%	No.	%
Manhattan	48	12%	0	-	0	-	48	9%
1 Bed	182	45%	37	59%	14	17%	233	42%
2 Bed	148	36%	26	41%	12	14%	186	34%
3 Bed	30	7%	0	-	36	43%	66	12%
4 Bed	0	-	0	-	22	26%	22	4%
Total	408	100	63	100	84	100	555	100

6.34 A comparison between the proposed housing mix and the Policy D.H2 is given in Table 6.2.

Table 6.2 Housing Mix Policy Comparison (by unit)

Unit Type	Market (%)		Intermediate (%)		Affordable Rent (%)	
	LBTH Policy	Proposal	LBTH Policy	Proposal	LBTH Policy	Proposal
Manhattan (studio)	-	12%	-	-	-	-
1 Bed	30%	45%	15%	59%	25%	17%
2 Bed	50%	36%	40%	41%	30%	14%
3 Bed	20%	7%	45%	-	30%	43%
4 Bed		-		-	15%	26%

6.35 Compared against LBTH's requirements, the proposed development will marginally deviate from the Affordable Rent housing mix, however, will result in a significant overprovision of family dwellings (three bedrooms+) (69%); this is an overprovision of 24%.

6.36 For the market dwellings there is a greater percentage of smaller dwellings. However, across the development, 16% of dwellings will be provided as family sized homes.

6.37 It is proposed that the Intermediate units will solely comprise one and two-bedroom units. This is a direct response to market demand and the difficulty in selling large shared ownership dwellings which are typically expensive and, when sold, are generally occupied by a number of individual occupants (i.e. sharers).

6.38 While the proposed housing mix deviates from that indicated in Policy D.H2, there is flexibility in the policy approach and a focus on maximising the delivery of affordable family sized housing, as required under Policy D.H2. The scheme will deliver 16% family-sized dwellings, with the majority, importantly, being in the Affordable Rent tenure. This is reflective of the approach set out in the emerging London Plan.

6.39 The mix is a direct result of the multitude of constraints which are present on this site and the delivery of significant social infrastructure which has a direct impact on viability. For example, in addition to contamination issues, as part of the development proposals, the Site Allocation requires the retention, reuse and enhancement of the two remaining gasholder structures, the delivery of an area of consolidated open space, public realm enhancements and canal edge improvements.

6.40 The proposed mix is, therefore, considered to be acceptable and appropriate in this location given the level of affordable housing to be provided, the importance of achieving a viable and deliverable development on a constrained site critical to achieving the important regenerative effect that this development will have on the surrounding area.



## **Affordable Housing**

- 6.41 Policy 3.12 of the adopted London Plan requires new developments to provide the ‘maximum reasonable amount’ of affordable housing on sites which have the capacity to provide 10 or more units. Policy 3.11 encourages a diverse housing sector comprising a tenure split of 70% social and affordable rent and 30% intermediate rent or sale.
- 6.42 Policies S.H1 and D.H2 of the LBTH Local Plan require the provision of a minimum of 35% affordable housing on sites providing 10 or more new residential units (subject to viability) and the provision of affordable housing in accordance with a 70:30 (affordable rent: intermediate tenure split). Policy D.H2 also confirms that affordable housing calculations will be based on habitable rooms.
- 6.43 The Mayor’s Affordable Housing and Viability SPG (August 2017) provides a threshold approach to affordable housing. The threshold approach states that schemes providing above 35% affordable housing or above 50% on public land (without grant) calculated in accordance with the total number of habitable rooms do not need to provide detailed viability information to the local authority or the Mayor, where relevant, at the application stage. The Mayor’s threshold approach to affordable housing is also reflected in LBTH’s Development Viability SPD (2017), which provides additional guidance in relation to viability appraisals and seeks to incentivise developers who deliver 35% affordable housing by not requiring viability appraisals to be submitted. Supporting text to policy S.H1 (paragraph 9.19) aligns with the Mayor’s threshold approach and states that ‘applicants are strongly encouraged to meet or exceed the delivery of 35% affordable housing. Lower levels will only be accepted where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery. Applications that do not meet policy requirements will be subject to viability re-appraisals’.
- 6.44 The draft new London Plan (2019) also establishes a strategic policy framework for the delivery of housing on gasworks and gasholder sites, which are identified as one of six strategic sources of housing supply.
- 6.45 Footnote 59 of the draft London Plan recognises the substantial costs of preparing surplus utilities sites for development, to which the Mayor identifies that former gasholder sites should be the subject to the 35% Fast-track Route as part of Appendix 1: M24 Further Suggested Changes, where evidence of decontamination, enabling and/or remediation costs shall be incurred to bring the surplus utility site forward for development. The evidence base to the LBTH Examination in Public by the Council themselves supports these requirements. The ground conditions at Marian Place are discussed in this Statement and, it can be concluded from this initial work that significant costs will arise from the decontamination and remediation of the site. Extraordinary costs are, however, not limited to ground conditions/remediation and also relate to the cost of meeting the requirements of the Site Allocation Policy for the site which seeks the retention of the two existing gasholder frames and the provision of one hectare of publicly accessible open space (proportioned across the wider allocation).
- 6.46 In accordance with the above policy requirements, it is proposed to deliver 35% affordable housing (by habitable room) of the total number of new homes (the proposed development will deliver 555 dwellings, 147 of which will be affordable). Furthermore, as required by policy the affordable housing will deliver a policy compliant tenure split of 71:29 affordable/social rent:intermediate (also calculated by habitable room). The affordable housing proposed is set out in Table 6.3.

Table 6.3 Proposed Affordable Housing

Unit Type	Intermediate		Affordable Rent		Total	
	No.	Habitable Room	No.	Habitable Room	No.	Habitable Room
1 Bed	37	74	14	28	51	102
2 Bed	36	78	12	36	48	114
3 Bed	-	-	36	170	36	170
4 Bed	-	-	22	132	22	132
Total	63	152	84	366	147	518
%	29%		71%			

6.47 The affordable rent dwellings will be delivered at 30% London Affordable Rent and 70% LBTH Living Rent. The affordability of the intermediate dwellings (delivered as 100% shared ownership) will be based on Mayoral income caps.

6.48 The affordable housing provision will be controlled through the s106 agreement. It is currently anticipated that all of the affordable housing will be delivered in the early phases of the development programme thus adding to the supply of affordable dwellings available in LBTH at the earliest opportunity.

### **Layout**

6.49 Residential accommodation is located in all buildings at first floor and above. Market dwellings will be within Buildings A, B, D and E with the affordable dwellings split across Buildings C and D.

### **Urban and Inclusive Design**

6.50 Policy at all levels requires high quality design and the protection of amenity. Paragraph 124 of the NPPF sets out the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. 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.

6.51 Adopted London Plan Policy 3.5 confirms the design of all new housing developments should enhance the quality of local places, taking into account physical context. Emerging London Plan Policy D3 requires development proposals to adopt a design-led approach to optimising site capacity. Part B(1) of this policy requires proposals to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Policy D4 deals with delivering good design.

6.52 Policy D4 confirms new housing development should be of high quality design and consider the qualitative aspects of a development set out in Table 3.2 in the design of housing developments. This includes the consideration of the layout of development proposals, such as spaces between and around buildings, noting they should form a coherent, legible and navigable pattern of streets and blocks; engender street based activity and provide a sense of safety and maximise active frontages onto public facing sides of a development, where appropriate wrapping around inactive frontages. It also suggests the site layout, orientation and design of individual dwellings and, where applicable, common spaces should provide privacy and adequate daylight for residents; be orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage; provide clear and convenient routes with a feeling of safety help reduce noise

from common areas to individual dwellings and help meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters.

6.53 Local Plan Policy S.DH1 sets out development is required to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales.

6.54 The development proposals have been considered against the relevant design-focused policies and is considered to offer an exemplar design solution to a constrained site without prejudicing development on the remaining land in the site allocation.

### **Height and Scale**

6.55 Developments containing tall buildings are required by Local Plan Policy D.DH6 to be of a height and scale, mass and volume that is proportionate to their role, function and importance of its location. They should also be of exceptional architectural design and make a positive contribution to the skyline during both day and night; the criteria is list in points A-L. Part 4 of the Policy relates to tall buildings outside of the identified Tall Building Zones (including those in site allocations), stating they will be supported provided they meet the criteria set out in part 1 and can demonstrate how they will comply with the following:

- 1 be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;
- 2 address deficiencies in the provision of strategic infrastructure;
- 3 significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area; and
- 4 not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in figure 8).

6.56 The development proposals prepared Rogers Stirk Harbour and Partners (RSHP) and detailed in the Design and Access Statement, sets out in detail the proposed design of the scheme, the high quality nature of the proposals and how they have responded to the site's context. The Design and Access Statement also provides detailed commentary on the design evolution throughout the various pre-application discussions and consultation exercises.

6.57 The proposed development ranges in scale from 6 to 13 storeys. The proposed scale is a response to the scale of the existing gasholders on the site, two of which are to be retained and refurbished with built development located within them. A scheme of 6-13 storeys results in taller development than the surrounding area, however the gasholders already exist on the site at this taller scale and as such, their infill with built development would not increase the established height, serving only reinforce it. Furthermore, the gasholders are a reflection of the area's industrial heritage and their retention is required by site allocation SA1.3.

6.58 In taking design cues from the existing structures and forms, it ensures the character and distinctiveness of the area is enhanced. It also facilitates the delivery of a design that is of innovative and of exceptional architectural quality. A Townscape and Visual Impact Assessment has been submitted as part of the Environmental Statement which considers this in further detail, along with a Heritage Statement which can be found at Appendix E1 of the Environmental Statement.

6.59 In terms of layout and privacy, the proposed buildings will be located, as a minimum, 9m from the site boundary to ensure that any redevelopment of the neighbouring sites can equally be designed to safeguard privacy of any proposed new residential development and to collectively

provide an 18m privacy distance. Between buildings, there are locations where distances fall below the recommended 18m due to the location of the existing gasholders and the formation of the proposed development to reflect these. However, due to the radial forms of the buildings, the narrowest dimension between the buildings is limited to one position. Similarly, the radial forms mean there is no direct orthogonal overlooking into opposite habitable windows and no directly facing amenity balconies. As such, impact on privacy has been appropriately designed out.

- 6.60 The proposed development offers the opportunity to enhance the overall quality of the environment. The development has been sensitively designed to relate carefully to the surrounding context and to present a human scale of development at ground level through the creation of colonnades for Buildings A and E and the use of landscaping and tree planting. The proposed circular arrangement of the site also and buildings also allows for the creation of a large central open space and numerous access routes connecting and integrating the site to the surrounding area.
- 6.61 In relation to part 4 of Local Plan Policy D.DH6, the site is located in PTAL 4-6a so can be considered to be in an area of high accessibility; it will maintain and enhance the visual significance of the gasholders within the area and will strengthen the integrity of the gasholders as an existing landmark.
- 6.62 The height and scale of the proposed development is therefore considered to be in accordance with planning policy.

### **Layout and Legibility**

- 6.63 Local Plan Policy D.H2 requires development proposals to contribute to improving and enhancing connectivity, permeability and legibility and positively contribute to the public realm.
- 6.64 The landscape and public realm vision for the development is founded on providing an accessible, sustainable and meaningful setting to complement the design of the proposed architecture and existing industrial forms. The heart of the development is a green respite from the busy surrounds offering diverse uses, ranging from large community gatherings and intimate spaces for single use.
- 6.65 The proposed development has been designed in a way that ensures all buildings are orientated so their entrances communicate directly with the central landscaped space and the outer crescent circulation pedestrian walkway and arcade routes to the perimeter landscape. The landscape proposals detailed in the Design and Access Statement identifies, the proposed movement strategy for both pedestrian and cyclist with both primary and secondary routes shown through the centre of the landscaped area and around the edge of the buildings and site boundary. It is expected the blocked footpath linking the site with Corbridge Crescent will be opened up, facilitating greater permeability and movement through the site.
- 6.66 Further details can be found in the Design and Access Statement, however, the proposals are considered to comply with the relevant planning policies.

### **Inclusive Design**

- 6.67 The proposed development has been designed in accordance with the principles of inclusive design. The residential dwellings, commercial accommodation and landscaped public realm will enable level access and convenient movement in terms of the approach to the buildings and internal circulation. The needs of disabled occupants and visitors have been integral to the design process.

- 6.68 London Plan Policy 3.8 requires developments to provide a minimum of 10% provision of wheelchair accessible homes. Emerging London Plan Policy D7 reaffirms that development proposals should achieve the highest standards of accessible and inclusive design. This includes providing high quality people-focused spaces that are convenient and welcoming with no disabling barriers and be designed to incorporate safe and dignified emergency evacuation.
- 6.69 Local Plan Policy D.H3 requires that 10% of the dwellings are built to the ‘wheelchair user dwellings’ accessible housing standard M4(3) and the remainder of the dwellings are built to the ‘accessible and adaptable dwellings’ accessible housing standard M4(2) both contained within part M (volume 1) of the building regulations.
- 6.70 10% of the residential dwellings will be delivered in compliance with M4(3) with the remaining dwellings design to comply with M4(2). Wheelchair user dwellings will be distributed throughout the development, across type, size and level, to ensure that wheelchair users have as much choice about the location and level of their home as anybody else.
- 6.71 Pedestrian approaches to the Site will be from the public footways around the development. All approaches to the development are level and will form part of the landscaped public realm, giving residents, staff and visitors a clear, safe and level journey to the transport connections and amenities that serve the site.
- 6.72 All the residential building entrances are directly off a level public walkway that frames the crescent-shaped central landscaped space. From the primary Marian Place entrance, visitors can orient themselves and are afforded clear visibility of the main entrances to all five buildings. Parallel to the inner crescent walkway there is an outer landscaped zone that links to the three site entrances.
- 6.73 Entrances to each of the buildings are step-free. Circulation throughout each building will be step-free, with no level changes within floors. All residential dwellings will be served by two passenger lifts and a single stair, so all wheelchair user dwellings will have access to a second lift in case one of the lifts breaks down. All communal corridors on the typical residential floor will be minimum 1500mm allowing sufficient space for wheelchair users to easily manoeuvre and to pass in opposite directions and providing a 1500 mm x 1500 mm turning space outside each wheelchair user dwelling.
- 6.74 Access to the central cycle store for residents is via a dedicated core that is accessed from the level, central pedestrian loop that links all building entrances. At least 5% of cycle parking spaces will be able to accommodate larger, adapted cycles or bicycles used by disabled cyclists. With regards to refuse, these are located at ground floor of Buildings B, C, D and E with level lobbied access from the main circulation lobbies. In Building A, access from the main circulation cores is provided to refuse stores on the lower ground level. Access to the refuse stores from any dwelling will be step-free via the lift cores.
- 6.75 For the non-residential floorspace, circulation will be step-free, with no level changes within floors. Where a non-residential unit spreads over more than one floor an internal lift will be provided within the unit.
- 6.76 The proposed development is, therefore, acceptable in terms of accessibility and will provide an inclusive environment for all occupants. Further details of the scheme’s access strategy are provided within the Design and Access Statement.

### **Townscape and Visual Impact**

- 6.77 The draft London Plan – Policy D9 states that where tall buildings are proposed, the impacts of such buildings on the visual appearance of the area should be assessed from a variety of views

and distances, against which tall buildings are expected to make a positive contribution to the local townscape in respect of improving legibility. Draft London Plan Policy HC4 also seeks to ensure that development proposals do not harm strategic views and their landmark elements; further guidance on the management of the designated views is set out in the London View Management Framework SPG provides.

- 6.78 Similarly, Policy D.DH4 of the Local Plan outlines that development is required to positively contribute to views and skylines of Tower Hamlets, including preserving or enhancing local views identified in conservation area appraisals and townscape and views to and from the Site which are important to the identify and character of the place.
- 6.79 An assessment of the Townscape and Visual Impact of the proposals has been prepared and forms Chapter D of the ES. The visual assessment considers the significant effects of the Proposed Development on 23 representative views around the application site. The townscape assessment considers the significant effects of the Proposed Development on four townscape character areas within 500m of the application site.
- 6.80 In terms of visual baseline, the site falls within the alignment of the of the background Wider Setting Consultation Areas of the LVMF SPG views from Westminster Pier to St Paul's (Assessment Point 8A.1) and The Queen's Walk to Tower of London (Assessment Points 24A.1, .2 and .3). However, the scale of the Proposed Development would be well below the Threshold Plane of both views and, therefore, would not be visible. No further assessment of these views was carried out and the development is compliant with Policy HC4 of the emerging London Plan.
- 6.81 Within LBTH Local Plan, the proposed development at the scale proposal would not affect the six designated views. No further assessment of these views was carried out and the development is compliant with the Local Plan.
- 6.82 To assess the visual impact of the development proposals, 23 verified views have been prepared, plus 15 unverified test views; these were elected in consultation with LBTH through scoping and pre-application discussion with LBTH officers. The views have been carefully selected in order to consider effects on specific designated views and representative and illustrative views that demonstrate the range of ways in which the Proposed Development would be seen and the resultant visual effects on "the general amenity experienced by people"
- 6.83 During development and construction, the effects on townscape and close views within the local area would be, depending on the proximity of the receptor, Negligible to Substantial in scale and Adverse in nature. In more distant views and townscape areas, where cranes and part-construction of the taller buildings on the application site are likely to be visible, the scale of the effect is likely to range from Negligible to Minor in scale and Neutral in nature.
- 6.84 All demolition and construction effects are indirect, temporary, reversible and short term. Because demolition and construction effects are temporary with no residual effects from those processes, once the Proposed Development is completed and operational, they are not considered to be significant.
- 6.85 Once the development is complete and operational likely effects on townscape character areas would range from Negligible to Substantial. All effects of a Moderate or Substantial scale are judged to be significant. All significant effects would be Neutral or Beneficial in nature. In terms of visual amenity, there would be no effects on the two sub-regional LVMF SPG designated views tested. The likely effects on representative local views would range from Negligible to Substantial demonstrating localised significant effects. All significant effects would be Neutral or Beneficial in nature.

- 6.86 The TVIA Chapter of the ES (Chapter D) concludes that based on the historic use of the former gasholders, their circular forms and their stepped nature (which changed depending on the amount of stored gas), the heights of the proposed buildings create a stepped skyline and, as the verified views demonstrate, they would form an attractive composition of the circular forms in key views in which the buildings are visible as a group.
- 6.87 The massing and architectural treatment of the Proposed Development has been designed to complement the retained gasholder frames, allowing them to remain legible within the townscape particularly in key views along the Regent’s Canal, as the verified views demonstrate. The scale of the tallest building within the Proposed Development, Building A within Gasholder No. 5, would allow the lattice work beam at the top the frame to remain visible against open sky helping to preserve the landmark quality of the gasholder. The upper levels of Building A would be articulated to accentuate the visibility of the frame at the upper levels of the gasholder. Similarly, the scale and footprint of the proposed Building E within Gasholder No. 2 would remain lower than the retained frame and set back from the frame in plan to allow the retained frame to remain legible where visible. As the rendered views demonstrate, the well-articulated architectural treatment and material palette of the Proposed Development would complement the rhythm and industrial language of the retained gasholder frames helping to further enhance the legibility of the retained gasholders within the local townscape.
- 6.88 The Proposed Development would have no effect on designated LVMF views. It would have localised significant effects on the character and quality of the townscape around the application site and on the composition and character of local views very close to the application site and longer local views where streets and open spaces align with the application site; none of these effects would be adverse.
- 6.89 The proposed development is, therefore, compliant with London and LBTH planning policies and will positively contribute to views and skylines of Tower Hamlets.

## **Residential Quality**

- 6.90 The draft London Plan includes detailed policies on design. The principles of these have been incorporated into the development proposals and overall it is considered that these are complied with in line with Policy D1. For example, the site:
- uses the land efficiently by optimising density;
  - enhances the local context by delivering buildings and spaces that positively respond to local distinctiveness;
  - includes inclusive pedestrian and cycle routes through the site;
  - provides safe, secure and inclusive environment;
  - provides active frontages;
  - provides conveniently located green space;
  - provides indoor and outdoor environments that are comfortable and inviting for people to use;
  - is of high-quality architecture; and
  - has high sustainability standards
- 6.91 The key issue is whether the proposed development delivers “*appropriate outlook, privacy and amenity*” (D3; part B7).
- 6.92 Housing quality and standards are included in emerging London Plan Policy D6.

- 6.93 Policy S.DH1 of the LBTH Local Plan seeks developments that meet the highest standards of design, layout and construction and positively responds to its context, townscape, landscape and public realm. Development should:
- Be of appropriate scale
  - Represent good urban design
  - Use high quality design, materials and finishes
  - Create well connect and inclusive and integrated spaces
  - Provide a range and mix of publicly accessible open spaces
- 6.94 Local Plan Policy D.H3 (Housing standards and quality) provides the most up-to-date residential amenity standards being applied across the Borough. This Policy applies the residential amenity policies in the most up-to-date London Plan; this is considered to be the emerging London Plan.
- 6.95 Policy D.DH8 requires development to protect and where possible enhance or increase the extent of amenity of new and existing buildings and their occupants by maintaining good levels of privacy – avoiding an unreasonable level of overlooking – ensuring that habitable rooms have an attractive outlook and adequate levels of daylight and sunlight. The supporting text confirms that an 18m privacy distance is considered as a guideline dependant on design and layout.

### **Minimum space standards**

- 6.96 Policy D6 of the emerging London Plan sets the minimum residential spaces standards; these are reflected in the Housing SPG and are consistent with the Nationally Described Space Standards. These are also consistent with Policy D.H3 of the Local Plan.
- 6.97 The proposed dwellings will provide high quality residential accommodation and meet the individual space standards for each dwelling. Due to the radial forms of the buildings, significant work has been undertaken to ensure the residential layouts are comfortable, functional and fit for purpose.

### **Aspect**

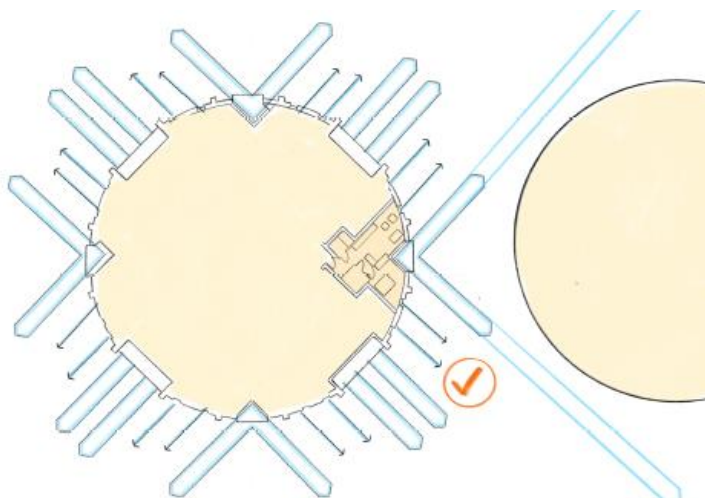
- 6.98 The Mayor’s Housing SPG Standard 29 stipulates that ‘developments should minimise the number of single aspect dwellings. This is also reflected in emerging London Plan Policy D6 which states housing developments should maximise the provision of dual aspect dwellings and single aspect dwellings should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D3 part B than a dual aspect dwelling.
- 6.99 Policy D3 is directly relevant to the development proposals as it seeks to ensure all developments make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Part B specifically refers to form and layout of developments and states, among others, that development proposals *should “enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions”*.
- 6.100 The desire to retain the two gasholders and to respect the setting of these and the Conservation Area has predicated the radial forms for the development in the gasholders and the site as a whole to ensure a holistic design approach. This radial form has significant benefits in that it positively responds to local distinctiveness and the local context in terms of layout, scale, appearance and shape. It also has the added benefit of reducing the appearance of bulk of the buildings, allowing for a greater degree of outlook from the apartments, improving proximity



distances and aiding the penetration of daylight and sunlight. The layout of the site and the proposed buildings ensures the optimum capacity of the site is realised through a considered design-led approach.

- 6.101 Generally, the site is not overlooked by residential development and at the nearest point (between existing and proposed buildings) to the north there are no flank windows in the existing properties. There is no direct line of sight from proposed windows on Building E to the existing residential building at Darwen Place. The distance between Building E and this building is over 25m.
- 6.102 Elsewhere, the proposed buildings have been set back by minimum 9m to ensure that any redevelopment of the neighbouring sites could equally be designed to safeguard privacy of any proposed new residential development and to collectively provide an 18m privacy distance.
- 6.103 In terms of internal distances between buildings, there are locations where this falls below 18m due to the location of the existing gasholders and the formation of the proposed development to reflect these. However, the radial forms of the buildings mean the smallest dimension between the buildings is limited to one position.
- 6.104 The residential homes have been designed to maximise the opportunities afforded by the proposed site arrangement; a series of radial buildings placed in a landscaped setting. Angled balconies, reflecting the building forms, permit a wide angle of view from principle habitable rooms; see example of this arrangement in Figure 6.1.

Figure 6.1 Approach to residential aspect and views



- 6.105 This permits excellent outlook and mid-distance landscape views past and between adjacent buildings and long-distance views through and beyond the site. The balcony arrangement means principle habitable rooms do not have an oblique aspect with adjacent buildings, views and outlook are always directed between and beyond the neighbouring structure.
- 6.106 It is recognised that there are a number of single aspect apartments and that some of these are north facing. This is a consequence of the design and is considered to be a more appropriate design solution to meet the requirements of Policy D3. Within these constraints, the designers have worked hard to ensure that many of the apartments have been specifically designed to have a dual aspect.
- 6.107 It should be noted that where a similar issue arose at the Oval Gasworks site, it was recognised that design solutions could address the concerns. The Planning Officer’s report for The Oval noted the following:

*“Plot 1 is located within Gasholder 1 and has a unique ring-shaped design to reflect the shape of the Gasholder. As such, it results in a higher number of single aspect units including 11 single aspect north-facing units. The unique requirements of building in the Gasholder are considered to be the exceptional circumstances which allow for these single aspect units. Providing more dual aspect units would require a very high number of cores and a large reduction in unit numbers.”*

- 6.108 Notwithstanding the quantum of single aspect apartments, care has been taken to ensure that each apartment will have adequate ventilation, appropriate levels of daylight and privacy and a good outlook. The radial form of the buildings provides a better aspect from apartments than that which a building with an orthogonal façade with a single orientation would provide.
- 6.109 Whilst approximately 42% of the dwellings are dual aspect, the dwellings on the outer rinds of Building A, due to the curved nature of the façade and their set-back balconies, benefit from a much wider angle of orientation. They produce a ‘semi-dual aspect’ condition. If dual aspect and ‘semi-dual aspect’ dwellings numbers are combined, they account for almost 60% of the dwellings provided.
- 6.110 In this context and having regard to the overall residential amenity for future occupants, it is considered that this is a very high quality development that would provide a highly attractive and desirable environment for all future occupants (residents and commercial occupiers).
- 6.111 Overall, the proposed development accords with the site allocation and the key design aspirations set out in planning policies.

### **Internal Circulation**

- 6.112 Due to the radial form of the proposed buildings, the scope to provide additional circulation space for residents is limited. As such, the proposed buildings include, with the exception of Building D which contains the Affordable Rent dwellings, up to eleven dwellings per core. This is above the eight dwellings per core as stated in Standard 12 of the GLA Housing SPG, although it is noted that this as a guide rather than a maximum. It is understood that the rationale behind this standard is to ensure the communal, circulation areas of residential developments provide for safe, secure access and facilitate a more intimate environment for residents.
- 6.113 While above the eight dwellings per core standard, the proposed layout will still create a high-quality residential environment which avoids long, inactive corridors and circulation spaces. The unique nature of design means in the larger buildings corridors are curved so appearance of a long corridor is avoided and punctuated at the mid-point by daylight illumination from the lift/stair lobby. In the smaller buildings, the design allows for two extended lobby spaces with a maximum of six apartments accessed off each. In both building types, the corridor and lobby spaces are only used by occupants of the apartments that they serve.
- 6.114 Due to the unique design of the development, the design solutions adopted and the high-quality nature of the development proposed, the proposals are considered acceptable when assessed against the intent of this Standard.

### **Daylight/Sunlight**

- 6.115 Point 2 Surveyors have been instructed to advise on the quality of daylight and sunlight to residential apartments and open space within the proposed development and assess the scheme against the relevant BRE guidance and the British Standard, BS8206 Part II. Assessments have also been undertaken in respect of the neighbouring residential properties; please see Chapter L and accompanying Appendices for the full assessments.

- 6.116 The internal daylight analysis results confirm that 76.5% of the 1,540 habitable rooms assessed across the Proposed Development will achieve the minimum recommended ADF targets for their relevant room uses (if using the 2% target).
- 6.117 As detailed in Appendix L7 of the ES, achieving the 2% ADF recommended for kitchens can be difficult in urban locations and where there is a higher demand for large, multi-use rooms in accordance with the requirements for modern living. These types of rooms, such as the Living/Kitchen/Dining (LKD) rooms proposed within this development, are by their very nature often deep rooms. This is also the case where rooms that face other proposed buildings within the site or are located facing into a courtyard. It is, therefore, generally accepted that a 1.5% ADF target can be applied to kitchens where they are directly linked to well-lit living rooms. On this basis, the overall level of compliance increases to 86% (from 76.5%).
- 6.118 Care has been taken to ensure the residential accommodation is predominantly designed to harness daylight potential within the areas where it will be most actively enjoyed. Taking into account the urban setting and characteristics and constraints of the site, this is considered to be acceptable. Notably, the proposals include the retention of gasholders no.2 and no.5 in their existing location which dictates the building arrangement and positioning of built forms.
- 6.119 The overall level of sunlight amenity within the residential elements of the Proposed Development is also considered to be good based on the number of rooms which are fully BRE and BS compliant and taking into the consideration the urban location and architectural intent of the Proposed Development.
- 6.120 Regarding the external amenity space, the assessment confirms the principle amenity area within the Site will receive good levels of sunlight with 63.6% of the area receiving at least two hours of direct sun on ground on March 21st and therefore meets the BRE criteria. The Building A courtyard space naturally receives lower levels of sun than the BRE recommends (given the design of the building) with none of the space receiving direct sun for the recommended two hours. The proposed users of this space will have access to other amenity spaces with very good levels of sunlight elsewhere within the scheme and so this is considered to be acceptable.
- 6.121 Throughout the design development process every effort has been made to maximise the daylight and sunlight potential to the proposed new dwellings and amenity spaces. Various design changes has been made to achieve this include to the building setting out and extent of glazing.

### **Amenity space**

- 6.122 Standard 26 of the Housing SPG requires a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm to be provided for each additional occupant. This standard is further reiterated in emerging London Plan Policy D6 (Housing Quality and Standards) and Local Plan policy D.H3.
- 6.123 In relation to communal amenity space provision, Local Plan Policy D.H3 states that 50 sqm for the first 10 units should be provided, plus a further 1 sqm for every additional unit thereafter.
- 6.124 With the exception of some Manhattan (studio) dwellings in Building A, all apartments are provided with balconies that meet the minimum standards. In order to compensate for the lack of balconies, the Manhattan dwellings are oversized by at least 10% and contain a Juliet balcony.
- 6.125 Due to the requirement to make the site more permeable and to provide a large area of public open space, as part of the Site Allocation, an area of identified communal amenity space for residents has been provided in the Courtyard and on the roof of Building A and adjacent to Building C. In addition, the landscape proposals identify a variety of landscape areas, each with

a different character and suited for different uses. For example, the woodland ring, local play area and central lawn are considered to provide the communal amenity space for residents and this exceeds the requirement under Local Plan Policy D.H3 (this generates a requirement for 595sqm).

**Playspace**

6.126 London Plan Policy 3.6 and draft London Plan Policy S4 seek to ensure that development proposals include at least 10 sqm per child of suitable play provision. Further guidance is set out in the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

6.127 Local Plan Policy D.H3 applies the above standard for playspace.

Table 6.4 Child Playspace Calculations (GLA Population Yield Calculator)

Child Age	Child Yield	Playspace required (sqm)	Proposed playspace (sqm)
Aged 0-3 (doorstep play)	65.9	659	660
Aged 4-10 (local play)	72.7	727	992
Aged 11-15 (youth play)	51.6	516	658
Aged 16-17 (youth play)	21.8	218	387
Total	212	2,120	2,697

6.128 All the required playspace will be delivered on site within the landscape proposals. Doorstop playspace will be provided in the Woodland Ring, incorporating playable trails which can be overlooked from carefully located breakout spaces. For children aged between 4-10 years, a designated play area is proposed near to the Emma Street pedestrian entrance. Other features include sound play areas suitable for younger children, a central lawn space suitable for pop-up sports and a fitness trail looping around the site that connects a number of exercise stations. A total of 2,697sqm playspace is proposed

**Density**

6.129 Both the adopted and emerging London Plan promotes the efficient use of urban land and the optimisation of housing potential in new developments to help meet the strategic challenges of population growth and the pressing need for new homes. The need to utilise accessible brownfield land optimally and efficiently is particularly key in opportunity areas and housing zones. Policy 3.4 (adopted London Plan) states that new development should optimise housing output for different types of location within the relevant density range (Table 3.2), subject to a contextual assessment. The adopted London Plan outlines an indicative density of 140-405 units per hectare (u/ha) or 650-1100 habitable rooms per hectare (hr/ha) for central sites.

6.130 Emerging London Plan Policy GG2 promotes higher density development, particularly on sites that are well-connected by public transport, walking and cycling to other infrastructure and services, applying a design-led approach. Emerging London Plan Policy D3 also seeks to optimise density (with consideration being given to site context, connectivity and accessibility, and the capacity of surrounding infrastructure). Policy D3 also confirms development proposals must make the most efficient use of land and be designed at the optimum density. Proposals that do not demonstrably optimise the housing density of a site should be refused and greater scrutiny of design is required the greater the level of density. The policy also discourages an overly mechanistic approach to density based on the matrix.

6.131 In the context of achieving Borough housing completion targets, the draft London Plan aligns with that of the NPPF, placing a focus on making efficient use of land. Draft Policy H1 (increasing housing supply) states that boroughs should (inter alia) ‘optimise the potential for

housing delivery on all suitable and available brownfield sites through their...planning decisions'. This is especially the case on sites identified as surplus utilities sites.

- 6.132 Local Plan Policy D.DH7 sets out residential development should be consistent with the guidelines set out in the London Plan.
- 6.133 As a surplus utility site and vacant brownfield site, the Site represents a significant opportunity to optimise housing delivery on the site through high density development and is allocated as such.
- 6.134 Taking the site area and number of dwellings proposed, the development has a density of 303 dwellings per hectare or 815 habitable rooms per hectare (based on a site area of 1.83ha). However, the GLA Housing SPG requires residential density to be calculated in accordance with a revised methodology for mixed-use schemes where the non-residential floorspace is deducted from the overall site area as a ratio of residential and non-residential floorspace. Calculations against the Housing SPG methodology are set out below:
- 1 Net site area: 1.83 hectares
  - 2 Total GIA: 63,864 sqm
  - 3 Of which is residential: 59,681 sqm (93.5% ratio)
  - 4 Ratio site area:  $1.83\text{ha}/93.5\% = 1.71\text{ha}$
  - 5 No. of dwellings: (555/1.71ha) / No. of habitable rooms: (1,494/1.71ha)
  - 6 Residential density = 325 units per hectare / 874 habitable rooms per hectare (hr/ha).
- 6.135 The quantum and density of the development represents a positive and responsive townscape solution, with high quality landscaping and amenity space which will be subject to long term management. The site is not of high environmental value and is previously developed land in a central location. Further, the site is highly sustainable, located in close proximity to Cambridge Heath station, Bethnal Green underground station, a number of bus stops and a cycle hire scheme. Therefore, based on the design-led approach to the scheme and the close proximity of the site to sustainable transport methods, it is considered that the quantum and density of the proposed development is acceptable.

## Heritage

- 6.136 The NPPF requires planning applications to demonstrate the significance of any heritage assets that may be affected by a proposal (paragraph 190). The level of detail should be proportionate to the assets' importance and the potential impact of the proposal on their significance. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, a desk-based assessment should be prepared. Paragraph 197 of the NPPF states that effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.137 Adopted London Plan Policy 7.8 requires planning applications to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Where proposed development will affect heritage assets or their setting, applications should seek to conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 6.138 Policy S.DH3 of the new Local Plan 2031 also states that proposals must preserve or where appropriate enhance the borough's designated and non-designated heritage assets.

- 6.139 A Heritage Statement has been prepared by Montagu Evans to accompany planning application and fulfils the requirement stated in the NPPF to describe the significance of any heritage assets affected by proposed development, including any contribution made by their setting. As such, the prepared Statement presents an historic and architectural overview of the Development Site and its environs, as well as an assessment of its significance. The appraisal is proportionate to the scale of the proposals, and focusses upon the gasholders at the Site, the two Regent's Canal Conservation Areas (CA) and the Hackney Road CA as these are the assets which will experience the greatest degree of change as a result of the proposed redevelopment.
- 6.140 With regards to the design proposals, the principle of infilling the existing gasholder structures within the frames is suitable and reflective of their historic appearance and use. The height of the development has also been determined by the envelope of the drums with differing heights of the buildings being reflective of the gasholders dynamic character.
- 6.141 Careful consideration has been given to ensuring the primacy of Gasholder no. 5 in views toward and within the Conservation Area is preserved. To achieve this, the height of the development is set beneath the crown, which will be seen against the sky. Building A, within gasholder 5, will be the focal point of the development, occupying the largest footprint and appearing in views along the canal.
- 6.142 The Heritage Statement concludes that the proposed development will have a demonstrably beneficial effect, delivering the following public benefits which are substantial and should be considered in favour of the development:
- 1 Removal of intrusive gas infrastructure (such as telemetry) lying within the Regent's Canal CA and its immediate setting (both within the Application Site). Removal of such negative features in a CA should be weighed in favour of the development.
  - 2 Opening the site to public access for the first time in 180 years, including a new canal-side public space. This will improve the ability for visitors to appreciate the significance of the Regent's Canal CA.
  - 3 The retention and refurbishment of Gasholder Nos. 2 and 5 will secure their long-term use and conservation in a manner that is viable and consistent with their conservation. In turn, the significance of the CA will be enhanced through the improvement to the appearance of the gasholder frames.
  - 4 The setting and significance of the Regent's Canal CA will be enhanced by a high-quality landscaping scheme that will demonstrably improve the way that the CA appears and functions.
  - 5 The provision of an outstanding and innovative design of the new buildings that will lie within the existing gasholder frames and other new buildings. The high-quality architecture will help raise the standard of design more generally in the area. The addition of the development will demonstrably enhance the way that this part of the Regent's Canal CA appears and functions.
  - 6 Introduction of a new view of the frame of Gasholder No. 5 by creating a central cut through within the internal new building. The new central view would be dramatic and add to the public experience of the gasholder and, in turn, the Regent's Canal CA and in the setting of nearby heritage assets.
- 6.143 The change in the character of the land at the Site, from a relict former industrial landscape to a high-quality residential-led development, will enhance contribution made by the Site to the Regent's Canal CA (LBTH) and other adjacent heritage assets.

- 6.144 The development will meet the policy requirements set out in NPPF and the policies in the adopted and emerging London Plan. The scheme would ensure that the locally distinctive character and context of the area would be enhanced, while at the same time finding a beneficial reuse of the two above ground gasholders and so comply with the LBTH Site Allocation Policies for the site. Similarly, the development would enhance the significance of the Regent's Canal CA, and the setting of nearby heritage assets, in a manner that is appropriate in term of design, scale and form, while delivering outstanding architecture.

## **Open Space, Public Realm and Landscaping**

- 6.145 The NPPF recognises that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. The definition of open space in the NPPF is defined as 'all open space of public value, including not just land but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.'
- 6.146 Adopted London Plan Policy 2.18 states that development should make the public realm comprehensive with gateways and focal points and that architecture should contribute to a coherent public realm, streetscape and wider cityscape; this is carried through to the emerging London Plan in Policy D7. Policy G4 of the draft London Plan goes on to state that development proposals should where possible create areas of publicly accessible open space particularly in areas of deficiency.
- 6.147 In terms of communal outside amenity space, Table 3.2 of emerging London Plan Policy D6 states these areas should provide sufficient space to meet the requirements of the number of residents; be designed to be easily accessed from all related dwellings; be located to be appreciated from the inside; be positioned to allow overlooking; be designed to support an appropriate balance of informal social activity and play opportunities for various age groups; and, meet the changing and diverse needs of different occupiers.
- 6.148 Policies relating to green infrastructure and the natural environment are set out in Chapter 8 of the emerging London Plan. Policy G1 requires development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Policy G4 also requires development proposals to, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. The provision of one hectare of open space is a requirement of the LBTH Marian Place and The Oval site allocation.
- 6.149 A landscape strategy has been prepared by Gillespies and is detailed in the Design and Access Statement. This identified seven character areas. Six of these areas will be open to the public, resulting in a minimum 0.71 hectare net gain of publicly accessible open space. The different character areas respond to the various uses proposed within the buildings and offer a variety of spaces for future residents, employees/visitors to the non-commercial space and the wider general public to occupy and enjoy. Where possible, all areas offer level access and materials that allow walkways and paths to be navigated by all.
- 6.150 The Central Lawn, PRS Grove and Canal Edge have been designed to allow for a flexibility of uses and multifunctional spaces and expected to be those most heavily used by the public. More intimate areas, such as the Woodland Ring, have been designed with future occupiers of the residential dwellings in mind and provides tree groves, play areas and seating pockets to provide an element of privacy to what will be a busy site.
- 6.151 An outline strategy for both the hard and soft landscaping treatment has been proposed, with details to be secured by condition. With regards to the softworks strategy, this aims to apply extensive urban greening to play a key role in improving the following for Marian Place:

- 1 Air quality
- 2 Reducing stress
- 3 Aiding recovery
- 4 Alleviating depression
- 5 Shading us from the sun - Climate change
- 6 Encouraging physical activity
- 7 Reduce obesity
- 8 Bringing communities together

6.152 Further details on the Urban Greening Factor is set out below.

### **Urban Greening**

6.153 Major development proposals are required through emerging London Plan Policy G5 to contribute to the greening of London by including Urban Greening as a fundamental element of site and building design. The Mayor of London recommends a target score of 0.4 for developments that are predominately residential.

6.154 The scheme has been analysed in line with the GLA emerging policy and can achieve an Urban Greening Factor score of 0.39. This calculation, as set out in the landscape section of the Design and Access Statement. The submitted information demonstrates that the proposals have been developed with a focus on high-quality green landscaping.

### **Biodiversity**

6.155 There are four key policies within the draft London Plan which relate to biodiversity and ecology: Policy G1 – Green Infrastructure; Policy G5 – Urban Greening; Policy G6 - Biodiversity and Access to Nature, and G7 - Trees and Woodland.

6.156 There are number of policies in the LBTH Local Plan which require new developments to provide a positive biodiversity value within application sites, improve quality and access to publicly accessible open space and mitigate any negative impacts on biodiversity, open space and water bodies. These policies are set out in detail in Chapter M of the ES.

6.157 A biodiversity strategy has been prepared and included in the landscape section of the Design and Access Statement. Given the current use of the site, there are a number of opportunities to enhance the site-wide biodiversity and ecology and to mitigate the impact of the proposed development. These include developing designs that:

- 1 Provide a network of trees and green spaces forming potential wildlife habitats and green corridors.
- 2 Promote sustainable planting by developing planting designs that are appropriate for their location, including the availability of sunlight and water.
- 3 Incorporate native plant species into the planting designs across the masterplan including the use of native shrub planting to provide nesting opportunities for birds.
- 4 Establish a series of living roofs on the buildings across the site, to aid biodiversity and establish a range of habitats
- 5 Incorporation of bird and bat boxes within the tree network
- 6 Living roofs have been proposed on buildings as indicated and provision made for these within the structures and access arrangements of each building.



- 6.158 Living/biodiverse roofs have been proposed on all buildings and will comprise areas of bare ground, sedum and wildflowers (including species which are notable within London such as Tower Mustard *Arabis glabra* and London Rocket *Sisymbrium irio*). This will mimic the Habitat of Principal Importance 'Open Mosaic Habitat', which together with the provision of log piles and sandbanks will provide opportunities for a range of faunal species, such as invertebrates upon which birds and bats will feed.
- 6.159 At present, the vast majority of the application site comprises habitats which are of very limited ecological value, due to limited vegetation cover and regular management. The Proposed Development will deliver significant enhancements in terms of habitats, including the provision of woodland and grassland, with the planting mixture based around the use of native and wildlife-beneficial species. This will fully offset losses, serve to contribute towards habitats in the Tower Hamlets BAP, and considered in light of future management, represent a net gain in biodiversity terms compared to the existing situation.
- 6.160 With the implementation of appropriate avoidance, mitigation and enhancement measures as outlined within Chapter M of the ES, there are predicted to be net benefits for ecology and nature conservation as a result of the Proposed Development. On this basis, the Proposed Development complies with all legislation and planning policy relevant to ecology and nature conservation.

## **Transport**

- 6.161 The NPPF requires all new development to contribute to the achievement of sustainable development, which comprises three overarching objectives: economic, social and environmental (Paragraph 8), of which are mutually supportive and combine to meet the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7). When determining planning applications, development should only be refused on highways grounds where they would have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. In demonstrating an acceptable impact, planning applications should be supported by a Transport Assessment that can outline any likely impacts of the proposal (Paragraph 111).
- 6.162 Similarly, the adopted London Plan requires all development proposals to ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed via the submission of a Transport Assessment prepared in accordance with TfL's Transport Assessment Best Practice Guidance (Policy 6.3). This is reiterated in emerging London Plan Policy T4 but also adds that Transport Assessments should seek to embed the Healthy Streets Approach within, and in the vicinity of, new development.
- 6.163 Policy S.TR1 of the new Local Plan 2031 seeks to manage growth to ensure that it does not increase traffic congestion and crowding on public transport due to trip generation from developments as well as through trips.
- 6.164 Emerging London Plan Policy T6 states adequate provision should be made for efficient deliveries and servicing and emergency access. This is also covered in Policy D.TR4 of the Local Plan 2031 which seeks to ensure that servicing trips so not impact on the transport network and amenity, highway safety or traffic flows.
- 6.165 The proposed development is predicted to generate 28 two-way vehicle trips during the AM peak (25 by car/van, three by motorcycle and one by taxi) and 33 two-way car trips during the PM peak (29 by car/van, three by motorcycle and one by taxi). The impact of these vehicle trips on the local highway network has been assessed in the Transport Assessment where it is concluded that the impact on local links would be low.

- 6.166 The impact on the local pedestrian, cycle and public transport networks has also been assessed. Here it is concluded that the proposals would have a low impact on each network. The surrounding area will benefit from the enhanced permeability of the site arising from the east-west routes across the site connecting the accesses on Marian Place and Corbridge Crescent. This will improve links between Cambridge Heath Road and Pritchard's Road for people in and around the site.
- 6.167 The resulting net increase in vehicle trips is not expected to have an impact on the local transport network. The design of the development will also help to encourage sustainable travel, in terms of the provision of secure on-site cycle parking.

### **Parking**

- 6.168 Emerging London Plan Policy T6 requires for car parking to be restricted and for car-free to be the starting point for all development proposals that are well connected by public transport. Maximum car parking standards for residential parking is set out in Policy T6.1 and notes that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles and at least 20% of spaces should have active charging facilities with passive provision for all remaining spaces. Disabled parking is required to be delivered for new residential developments and must ensure that for 3% of the dwellings at least one designated disabled space persons parking bay per dwelling is available from the outset; and to demonstrate how the additional 7% of dwellings could be provided with a disabled persons parking space if future demand requires it. The criteria for disabled persons parking bays is set out in part H of the emerging Policy.
- 6.169 Local Plan Policy D.TR3 cites that development is required to comply with London Plan parking standards for vehicles and bicycles and should prioritise sustainable approaches. Parking standards are detailed in Appendix 3.
- 6.170 The proposed development includes the delivery of 57 car parking spaces, to be provided within the shared basement of Buildings C and D. This represents the full 10% accessible car parking space requirement. 17 of these spaces (3%) to be provided as accessible spaces from outset with the remaining 40 spaces (7%) to be large spaces available for the use of non-disabled residents until such time that demand arises for use of the full 10% of spaces by accessible users. Access to the basement is from Building D which is the closest Building to the entrance of the site.
- 6.171 Due to the constrained nature of the site and the lack of opportunity to provide the additional 7% of accessible spaces if demand arises, it is necessary to provide the full complement from the outset. No designated car parking spaces are provided for the non-residential uses.
- 6.172 Disabled drivers from Buildings C and D (which accommodate homes of all tenures) will be able to access the car park in the basement via the lifts/stairs located within each building. Drivers from Buildings A, B and E will be able to access the car park via an external lift/stair located adjacent to Buildings C and D. Due to the utilisation of one of the existing gasholder drums and the desire for the site to be (mostly) car free and dominated by landscape features and public realm, it is not feasible to directly connect all accessible parking spaces with the relevant residential core. Instead, and in compliance with emerging Policy T6.1(h), the distance between the disabled person parking bay and dwelling/building entrance has been minimised so the maximum distance between the space and the relevant building entrance is no more than 102m and level access has been provided. The entrance to each building, including the pedestrian/cycle parking lift/access from the basement car park is located on a central path which circles the Central Lawn. The surface of this will be resin-bound gravel (or similar) suitable for use by wheelchairs and cycles. Further details can be found in the landscape section of the Design and Access Statement.

6.173 Regarding cycle parking, this is expected to be delivered as per the standards in emerging London Plan Policy T5 and designed in accordance with the London Cycling Design Standards. The development proposals will deliver 976 resident spaces plus 14 visitor spaces in line with the minimum requirement for residential parking spaces. All the resident cycle parking space will be both secure and covered, whilst the visitor spaces will be provided in the form of Sheffield stands in the public realm area.

6.174 The proposed non-residential uses will comprise 40 long-stay cycle parking spaces for staff and 73 short-stay cycle parking spaces for visitors. The staff cycle parking provision will be secure and covered. A cycle store comprising 24 cycle parking spaces (provided with 12 two-tier racks) will be provided at ground level within Building A. The remaining staff cycle parking spaces will be provided in a covered external shed near Building E. The visitor spaces will be provided in the form of Sheffield stands in the public realm area.

## **Energy, Sustainability and Overheating**

6.175 An Energy Statement, Sustainability Statement and Dynamic Overheating Assessment prepared by WSP, have been submitted with the Planning Application in line with planning policy requirements.

6.176 In line with the London Plan, the Energy Statement demonstrates that the Proposed Development follows the Energy Hierarchy of ‘Be Lean’, ‘Be Clean’ and ‘Be Green’ to reduce the carbon dioxide emissions of the entire Development. It has also given due regard to the ‘GLA Guidance on preparing energy assessments as part of planning applications’ which sets out that each assessment is required to demonstrate how the targets for regulated CO2 emission reduction over and above 2013 Building Regulations will be met using the Mayor’s energy hierarchy.

6.177 Emerging London Plan Policy SI2 requires all major developments to be zero-carbon and to demonstrate how this target can be achieved within the framework of the energy hierarchy. A minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall will need to be provided as either a cash in lieu contribution to the borough’s carbon offset fund, or off-site provided that an alternative proposal is identified and delivery is certain.

6.178 The design of Proposed Development has taken a holistic approach towards sustainability, incorporating a range of measures to maximise sustainability across the development from sourcing of materials, development management, energy and water use, waste management and transport. Key sustainability measures include:

- 1 Achieving BREEAM ‘excellent’ for all non-residential floorspace;
- 2 Using highly efficient building fabric;
- 3 Including efficient building services plant, including providing high efficiency air handling plant with heat recovery and low specific fan power;
- 4 Having 100% low energy lighting and maximised use of LED and low energy fixtures;
- 5 Proposing a heat network provided by Air Source Heat Pumps, Water Source Heat Pumps and high efficiency back-up boilers (see details below);
- 6 Roof mounted PV panels;
- 7 Demonstrated adaptation to climate change by reducing its external heat rejection to the atmosphere; incorporating planting to combat the effects of climate change; and it reduced

reliance on air conditioning systems to combat overheating by using solar control glazing, mechanical ventilation and reducing internal heat gains as far as feasible (see overheating details below);

- 8 Proposing a biodiversity net gain and achieving an Urban Greening Factor score of 0.39; and
- 9 Proposing development in a highly suitable location and facilitating active transport measures.

6.179 In terms of energy, the development (domestic & non-domestic areas) will be served by a central ambient loop system with an Air Source Heat Pump (ASHP) as the primary energy source. The ASHPs will provide the necessary cooling and heating from the roof plant which then distributes to the energy centre. The energy centre will be located on Level B1 of Building B and will regulate the ambient loop for the entire development. The basement energy centre will have a Water Source Heat Pump (WSHP) connected to the ambient loop. This will provide Chilled Water (CHW) and Low Temperature Hot Water (LTHW) to the commercial areas. To optimise the annual efficiency of the ASHPs, high efficiency gas-fired boilers are proposed to meet periods of peak heating demand.

6.180 Table 6.5 sets summaries the steps taken in response to each of the three principle steps in the GLA Energy Hierarchy, Be Lean, Be Clean and Be Green.

Table 6.5 Summary of responses to Be Lean, Be Clean, Be Green

Stage	
Be Lean	The application of the measures identified in Section 5 of the Energy Statement provides an overall reduction of 11.39% in carbon emissions from the Proposed Development and a total carbon reduction of 77 tonnes CO2 per annum from the baseline carbon emissions. After this stage of the energy hierarchy the total regulated carbon emissions from the Proposed Development is 602 tonnes CO2 per annum.
Be Clean	A connection to a district heating network is not currently possible with the closest point of connection to an unknown proposed network of around 776m away following the existing road network. Over this distance, the estimated cost of providing the pipework to deliver a connection to the network is prohibitive. Also, although the heat network supplier is considering extending the network, it is not anticipated to extend north to the application site. Provision will be made to allow for future connection to a district heating network.  The development proposes a communal heating and cooling system based on the use of heat pumps. Therefore, as the development is not proposing to connect to a district heating network or be served by CHP, the carbon emissions savings remain unchanged from the “Be Lean” stage of the Energy Hierarchy and the benefit of heat pumps will be demonstrated in the Be Green stage of the Energy Hierarchy.
Be Green	The feasibility of a range of renewable technologies has been assessed in the context of the London Plan. It was concluded that a combination of Air Source Heat Pumps, Water Source Heat Pumps and Photovoltaic Panels is suitable for inclusion in the proposals.  The renewable technologies provide together an overall reduction of 30% in carbon emissions from the Proposed Development and a total carbon reduction of 204 tonnes CO2 per annum from the baseline carbon emissions compliant development. After this stage of the energy hierarchy

Stage	
	the total regulated carbon emissions from the Proposed Development is shown to be 398 tonnes CO2 per annum.

6.181 Overall, the Proposed Development is shown to achieve the following carbon reductions after following the Energy Hierarchy when compared to Part L 2013 using SAP 10.0 carbon factors:

- Residential Element – 45.77%
- Non Residential Element – 24.20%
- Whole Proposed Development – 41.39%

6.182 The main element of the development meets and exceeds the carbon reduction target of 35% set by GLA and the carbon reduction target of 45% set by the LBTH Local Plan. The non-residential elements have maximised efforts to achieve targets set by Tower Hamlets and the GLA and achieve high performance.

6.183 The development will be required to make a carbon off-set payment amounting to £716,352 due to the site carbon shortfall as required under emerging London Plan Policy SI2.

**Overheating**

6.184 Major development proposals should demonstrate how the potential for internal overheating will be reduced and reliance on air conditioning systems minimised; this should be in accordance with the cooling hierarchy detailed in emerging London Plan Policy SI4.

6.185 For the residential dwellings, the passive design these has been considered in detail. The orientation and massing of the buildings have also been considered particularly relative to other buildings which will could provide an element of shading (but also to maximise daylight opportunities). Through the design process, internal layouts have been refined to allow the daylighting requirements to be achieved without reliance on excessive amounts of glazing. Façade options have been also been reviewed to minimise heat loss and solar gains, and to investigate the introduction of external shading measures.

6.186 A range of overheating studies have been undertaken in line with guidance in industry documents such as CIBSE TM52, CIBSE TM59 and CIBSE Guide A. Based on the modelling undertaken, all dwellings are will comply with the adopted and emerging London Plan policies and Part L Criterion 3 of the Building Regulations and with CIBSE TM59 and TM52.

6.187 The strategy for minimising cooling demand in accordance with Policy for the Proposed Development is as follows:

- 1 100% low energy lighting will be provided to reduce internal heat gains within the apartments.
- 2 A highly efficient fabric and glazing is proposed incorporating glazing with low-e solar shield glass to protect the interior from solar gain.
- 3 The apartments will have openable windows.
- 4 Within the apartments, mechanical ventilation will be provided via MVHR to cover peaks.

6.188 The results of the assessments showed that all apartments are compliant with the TM52 and TM59 overheating criteria for the DSY1 weather scenario.

## **Environmental Issues**

### **Contamination**

- 6.189 The NPPF states that development proposals should consider the suitability of a development site, in relation to the level of contamination, and opportunities for its remediation. Adequate site investigation should be undertaken to assess the level of contaminants, and as required, remediation should be completed to return land to a level that cannot be considered as contaminated under Part IIA of the Environmental Protection Act 1990 (Paragraph 178). Where land is known to be contaminated, the responsibility to secure a safe remediation of such land is the liability of the developer or landowners (Paragraph 179).
- 6.190 The London Plan (Policy 5.21) outlines that the Mayor shall support the remediation of contaminated land to ensure that brownfield land can be safely developed without resulting in harm to human health and the environment or leading to an activation or spread of contaminants. Part 11 of draft London Plan Policy SD1 states developments in OAs should take appropriate measures to deal with contamination that may exist.
- 6.191 Chapter F of the ES provides an assessment of potential effects associated with ground conditions and is informed by two contamination assessments undertaken by RSK in 2018.
- 6.192 The assessment concluded there are limited potential risks to people and the environment associated with the proposed development and the ground conditions on site during the construction phase. Mitigation measures informed by site investigation and defined in the remediation strategy and Contractor's method statements will ensure appropriate design and construction during development. On completion of the development, all potential operational effects are assessed to be negligible and no supplementary measures are necessary.
- 6.193 Upon completion and occupation of the Proposed Development, the Site will be covered by a combination of buildings, hardstanding, landscaped areas and gardens. The buildings and hardstanding will both form an effective barrier to any residual contamination at the Site. The implementation of the remediation strategy would reduce any residual contamination. This will include excavation of contaminated made ground and the importation and placement of clean soil material within the green areas which create an effective barrier to any residual contamination; and the remediation of any identified hotspots. Therefore, there is little potential for the Proposed Development's end users (i.e. residents, maintenance workers, neighbours, and users of public open spaces) to be exposed to contamination once the Proposed Development is completed and occupied.
- 6.194 No significant geo-environmental effects associated with the Proposed Development during enabling and construction and once complete and operational are therefore anticipated following the implementation of an appropriate Remediation Strategy.
- 6.195 The proposed development is compliant with relevant London and Local Plan Policies.

### **Socio-Economics**

- 6.196 Chapter G of the ES sets out the likely significant effects on socio-economics as a result of the proposed development. There are no notable socio-economic demographic trends local to the application site, and the economy is typical of that in a central London Borough. There is limited existing capacity within primary education providers locally, and some available capacity at secondary level. Primary healthcare providers are below capacity compared with the England average. There is some availability of open and play space locally.
- 6.197 The Proposed Development will result in the following:

- 1 The creation of an estimated 275.6 net construction employment jobs per annum over the construction phase;
- 2 The creation of an estimated 328 net additional jobs through the provision of office, retail, restaurant, and commercial floorspace;
- 3 £7.6m spent locally each year from the new residents;
- 4 The delivery of 555 net additional dwellings, which represents 14% of the annual target outlined in the London Plan (15% of the target in the Draft London Plan); and
- 5 The provision of 147 affordable homes split 84 affordable homes and 63 intermediate homes.

6.198 There are no significant adverse residual socio-economic effects which will arise as a result of the Proposed Development, including those relating to primary and secondary education and primary healthcare facilities.

### **Microclimate**

6.199 In line with the adopted London Plan Policy 7.6 (Architecture) and Policy 7.7 (Location and Design of Tall and Large Buildings) all new development should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to wind and microclimate, against which tall buildings should not create unacceptable wind turbulence. This is reflected in emerging London Plan Policy D9. The emerging London Plan also requires that in designing public realm, consideration should be given to the local microclimate created by buildings.

6.200 At the local level, Policy D.DH6 of the LBTH Local Plan also requires that tall buildings demonstrate how they will mitigate any negative impacts on the microclimate and amenity of the application site and surrounding area. Whilst Policy S.DH1 states that development must use design and construction techniques to ensure the development does not result in unacceptably harmful impacts arising from (inter alia) wind.

6.201 A Wind Microclimate Assessment has been prepared to inform the Microclimate and Wind Environment Chapter of the Environmental Statement (Chapter I). Wind tunnel testing has been undertaken to fully assess the impact of the Development upon pedestrian comfort and the potential for strong winds to impact on pedestrian safety. Wind conditions have been assessed for the construction site, both off-site and on-site thoroughfares, building entrances and amenity areas.

6.202 The main findings of this assessment are set out below:

- 1 For all of tested configurations, wind conditions at both street and upper levels are rated as suitable - in terms of pedestrian safety - for the general public.
- 2 Within the proposed development (including the pedestrian routes and amenity spaces) and immediate surrounding area, wind conditions at street level are rated, at worst, as suitable for sitting/standing.
- 3 From a pedestrian-level wind perspective, the introduction of the cumulative schemes has a negligible impact throughout the tested area.
- 4 In summer and in the context of the existing surrounding area, wind conditions on the rooftop terraces accessible to the residents are considered suitable for long periods of sitting and therefore suitable for the intended use.
- 5 For majority of tested configurations, wind conditions at both street and upper levels are rated as suitable - in terms of pedestrian comfort - for the intended uses, except some of the amenity spaces within the proposed development. The wind comfort level at four receptors

was identified to be ‘standing’, which is one category below the desired one. However, it is considered that the currently planned landscaping would successfully promote the wind comfort level in these areas to be suitable for the intended use and thus no additional mitigation would be required.

- 6.203 On the basis of the above findings, all considered configurations were found to be safe for the general public and suitable for their intended uses and, therefore, compliant with planning policy.

### **Air Quality**

- 6.204 The NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution (Paragraph 170e). It states at Paragraph 181 that planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 6.205 The London Plan and the Mayor’s Air Quality Strategy (2010) seek to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal, effects on human health are likely to occur. Policy 7.14 (Improving air quality) of the London Plan promotes an ‘air quality neutral’ approach, where developments will not contribute to further deterioration of air quality. Part F of Policy GG3 in the emerging London Plan seeks to ensure developments improve London’s air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution. When designing new developments, Policy D3 requires these to help prevent or mitigate the impact of noise and poor air quality.
- 6.206 The draft London Plan (Policy SI1 Improving air quality) states that large-scale redevelopments should propose methods of achieving an Air Quality Positive approach through the development. Air Quality Assessments should be submitted with all major developments unless transport and building emissions will be less than previous or existing uses, and a preliminary AQA should be carried out before designing the development to inform the design process. Where emissions need to be reduced, this should be done on-site unless it can be proven to be impractical or inappropriate and so long as equivalent air quality benefits can be demonstrated.
- 6.207 At the local level, Policy D.ES2 of the new Local Plan cites that development is required to meet or exceed the ‘air quality neutral’ standard including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles. The whole of the borough falls within an Air Quality Management Area.
- 6.208 Chapter J of the ES identifies there will be a number of impacts of varying risks to human health and ecological due to construction activities. Construction traffic impacts have been assessed quantitatively by dispersion modelling, and the impacts were identified as negligible (not significant). Through good site practice and the implementation of suitable mitigation measures, the effect of dust and PM10 releases would be significantly reduced. The residual effects of dust and PM10 generated by construction activities on air quality are therefore considered to be insignificant. The residual effects of emissions to air from construction vehicles and plant on local air quality are temporary and are negligible (not significant).
- 6.209 A quantitative assessment of the potential impacts during the operational phase was undertaken to predict the changes in NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations that would occur due to emissions from traffic generated by the Proposed Development and the proposed Energy Centre. The assessment shows that the impacts on air quality at the existing receptors are negligible and the residual effects are negligible (not significant). Concentrations at proposed



receptors are below objectives and fall within APEC A, indicating that no mitigation should be required.

6.210 The results of the Air Quality Neutral Assessment show that the Proposed Development compliant with the building and transport emissions benchmarks for NO<sub>x</sub> and PM<sub>10</sub>. Therefore, the Proposed Development is air quality neutral.

6.211 It is considered that the Proposed Development will comply with national and local policy for air quality.

### **Noise and Vibration**

6.212 The NPPF requires new development to be appropriate to its location when considering the effects of pollution sources including noise and vibration (Paragraph 180). Consequently, planning applications should demonstrate that the development will not unacceptably introduce or be detrimentally sensitive to existing pollution sources, with all applications expected to demonstrate that new noise sources can be successfully mitigated and/or reduced to minimise potential impacts.

6.213 The London Plan seeks to manage the impacts of noise to improve health and quality of life. Policy 7.15 therefore requires development proposals to: manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development; and separating new noise sensitive development from major noise sources through the use of distance, screening or internal layout. Where it is not possible to achieve separation of noise sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles.

6.214 The emerging London Plan (Policy D14) supports the principle to reduce, manage and mitigate noise to improve health and quality of life. The emerging London Plan also introduces a specific policy covering 'Agent of Change. In this policy (D13), the Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses in a sensitive manner on the proposed noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

6.215 At the local level, Policy D.ES9 seeks to manage noise and vibration from new development and manage existing sources of noise on sensitive development.

6.216 A Noise and Vibration Assessment has been prepared as part of the ES (Chapter K) in accordance with the above policy and confirms that during construction noise and vibration impacts will vary between not significant and significant major adverse. The proposed mitigation includes adoption of Best Practicable Means as a method of controlling noise and the erection of 3m high site hoarding during construction.

6.217 The impact of operational road traffic noise is considered to be not significant and no mitigation measures are required.

6.218 It is considered that subject to the glazed elements of the building façade achieving the specifications set out within this report and the proposed ventilation strategy, an adequate internal noise environment will be provided to future occupants and on this basis, it is concluded that the application site is suitable for residential development.

6.219 It is considered that the Proposed Development will comply with national and local policy for noise and vibration.

### **Agent of Change**

6.220 Regarding the Agent of Change principle, the existing uses surrounding the site have been considered against this policy. It is important to note that a number of the existing uses around the site operate under temporary planning permissions, including Containerville and the arts and music space at The Oval (which includes late night events). In relation to the latter, the use of the site for the arts and music use expired on 1 May 2019 and it is understood to be operating outside of any planning permission. Regarding its long term use as a nightclub, the committee report accompanying the most recent permission (ref. PA/17/01844) confirmed that *“in the long term, is not considered that the site would be suitable to accommodate a Sui Generis arts and music venue and the proposal, if permanent, would fail the strategic need to provide housing on the site and would not accord with Policy 3.3 of the London Plan, Policies SP02 and SP12 of the Core Strategy and the Managing Development Document Site Allocation for the site”*.

6.221 Planning permission was granted for a shortened period to that applied (approximately two years as opposed to five years) on the basis that a short temporary use would not threaten the medium to long term regeneration objectives and vision for the site or the Council’s ability to deliver housing growth.

6.222 The conclusion arrived at by the Officer in determining the temporary use application is considered to remain valid. The site continues to be allocated housing (and employment) uses and so any new application to regularise the use of the site as a nightclub is expected to be refused on the grounds that it is incompatible with the adopted and emerging site allocation.

### **Water Environment**

6.223 In accordance with the NPPF, inappropriate development within areas of flood risk should be avoided. Where development is necessary, such development should be made safe across its lifetime without increasing flooding risk elsewhere (Paragraph 155), which shall be informed through the preparation of a site-specific flood risk assessment.

6.224 In line with the London Plan, all development proposals must comply with the flood risk assessment and management requirements of the NPPF and the associated Technical Guidance on flood risk (Policy 5.12). Emerging London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated. Regarding sustainable urban drainage, emerging London Plan Policy SI13 states development proposals should achieve greenfield run-off rates and ensure surface water run-off is managed as close to the source as possible. A drainage hierarchy is listed in the policy.

6.225 An assessment of Water Resources and Flood Risk has been undertaken as part of the ES (Chapter O) and a Flood Risk Assessment (FRA) has been prepared by WSP in line with planning policy requirements and is submitted in support of this Planning Application (see Appendix O1 of the Environmental Statement).

6.226 The Flood Risk Assessment identifies the Site as being within Flood Zone 1, and therefore the probability of tidal or fluvial flooding is assessed as negligible.

6.227 Surface water is identified as a possible source of flood risk due to the localised flood risk spots and medium risk surface water flow paths present on and surrounding the site, specifically to the south east. This however has been mitigated by the design of an outline drainage strategy which demonstrates the ability to reduce surface water runoff significantly compared to existing and accommodate surface water runoff during all events up to and including the 100 year plus

40% climate change allowance to prevent potential exceedance flows off-site. As such the proposed development will reduce the probability of surface water flooding at the Site and in the surroundings.

6.228 Other potential sources of flooding such as fluvial and tidal, canal and sewer have been investigated and are deemed negligible to low.

6.229 The proposed surface water drainage strategy optimises the use of SuDS where appropriate in line with best practice, national and local policy and has been developed in discussion with the relevant stakeholders. At this outline stage it is proposed that surface water runoff will be attenuated to greenfield rates before being discharged to the existing TW combined water sewerage network adjacent to the site.

6.230 In discussions with Thames Water, it has been confirmed that if surface water flows from the development are reduced to greenfield runoff rates that there will be sufficient capacity in the local surface water sewerage network to accommodate these flows. Thames Water have also confirmed that foul flows can be accommodated in the public network.

### **Archaeology**

6.231 In accordance with the NPPF, below ground heritage assets should be conserved in a manner appropriate with their significance. London Plan Policy 7.8 expects new development to make provision for the protection of archaeological resources, landscapes and significant memorials, with development expects to incorporate measures that identify, record and, where appropriate protect the presence of archaeology. Emerging London Plan Policy HC1 that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

6.232 As part of the ES submitted in support of this Planning Application, CgMS have prepared an Archaeological Desk-Based Assessment. The report considers the archaeological impacts of the Proposed Development upon below ground heritage assets and any likely effects arising from the Proposed Development.

6.233 In terms of relevant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefield or Historic Wreck sites have been identified within the vicinity of the site. In terms of relevant local designations, the study site is not located within an Area of Archaeological Priority.

6.234 The assessment considers the site has an archaeological potential for the Post Medieval and Modern periods, principally associated with the extant gasholder present from the middle of the nineteenth century onwards. Past-post depositional impacts within the study site are considered likely to have had a severe, cumulative negative archaeological impact. Prior to the creation of the gasholder station from the mid nineteenth century onwards, areas of the site were occupied by a fish pond, canal lay by and open land.

6.235 It is anticipated that remains of national significance will not be found on the site. To ensure this is the case and to accord with emerging London Plan Policy HC1, it is recommended that a record of the historic building of the existing gasholders and any associated features be undertaken.

## 7.0 **Planning Obligations and CIL**

### **Draft S106 Heads of Terms**

- 7.1 The applicant proposes to enter into a Legal Agreement in relation to the proposed development. The Heads of Terms for the legal agreement will need to be agreed by separate negotiation.
- 7.2 The NPPF sets out that planning obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. LBTH has prepared a Planning Obligations SPD (2016) which should be used as a framework for calculating S106 planning obligations associated with developments. These are: affordable housing; sustainable transport; open space; education; health; training employment and enterprise; biodiversity; community facilities; highway works and public realm.
- 7.3 On this basis of the above, and taking into account the proposed development for the site, the draft S106 Heads of Terms are as follows:
- 1 Delivery of 35% affordable housing;
  - 2 Employment, Skills, Training and Enterprise;
  - 3 0.71 hectares of open space provision and maintenance for play equipment;
  - 4 Sustainable transport measures including Travel Plans;
  - 5 Carbon Off-Setting contributions; and
  - 6 Monitoring costs.

### **Community Infrastructure Levy**

- 7.4 In April 2012, the Mayor brought forward a CIL Charging Schedule to help fund Crossrail. This was reviewed and in April 2019 the Mayor brought forward MCIL2. The London Borough of Tower Hamlets lies within Mayoral CIL Charging Zone 2 where the rate is £60 per sqm.
- 7.5 LBTH adopted a revised CIL Charging Schedule in January 2020. The site is located in Zone 2 and the rates in the Charging Schedule are: £150/sqm for new residential floorspace and £100/sqm for new retail floorspace (all other uses are either 'nil' charge or not relevant).
- 7.6 The proposed development will therefore give rise to separate Mayoral and Borough CIL charges that the Applicant will be liable for.
- 7.7 The planning permission will be a 'phased planning permission' for CIL purposes as defined by CIL Regulations 2 and 9. As a result each phase will be a separate Chargeable Development, for which CIL will be calculated and payment made in line with the Council's instalments policy.

## 8.0 Conclusion

- 8.1 This Planning Statement has been prepared on behalf of St William Homes LLP to accompany the full planning application for the Marian Place Gasholder site in Bethnal Green.
- 8.2 The proposals have been developed over an 18 month period in consultation with LBTH Planning and Design Officers, the GLA and key stakeholders and the local community.
- 8.3 The Planning Application proposes to deliver a high quality development that will result in significant regeneration of the Site. As a direct result of the development proposals, the application will deliver a number of significant planning and public benefits for LBTH, the local community and future occupiers. These are material benefits which weigh in favour of a grant of planning permission and are set out below:
- 1 The opportunity to deliver a significant quantum of new housing, including affordable homes and family sized units. This will be a meaningful contribution towards the Borough's housing need and housing choice. The Site will deliver 555 new homes, 35% of which will be affordable housing comprising a policy compliant split of affordable/social rented units and intermediate units (71:29 tenure split).
  - 2 The delivery of new high-quality flexible non-residential floorspace that will support the day-to-day needs of the development, provide active frontages to the new public open space and complement the existing services provided in Cambridge Heath.
  - 3 The provision of a minimum 0.71 hectares of publicly accessible open space, including children's playspace and landscaping features which would serve the needs of existing and future residents and the wider community; and result in tangible improvements to biodiversity and ecology in accordance with the requirements of Site Allocation 1.3.
  - 4 The opening up of the site to the public will the first time it has been done so in over 180 years.
  - 5 The delivery of a high quality development of exceptional architecture and urban design that will act as a catalyst for the regeneration of other sites in the Site Allocation and wider area and set a benchmark for architectural quality.
  - 6 An appropriate townscape response to the Site and surrounding area, considering the scale and nature of recent and future anticipated change in the surrounding area and the requirement to provide much needed market and affordable homes.
  - 7 A development that seeks to support sustainable environmental objectives through taking steps to achieve reductions in energy consumption, carbon, water usage and waste production.
  - 8 It is estimated that the construction works would generate approximately 275.6 construction jobs over the duration of the construction programme for the Development. The number of people working on-site will vary considerable over the programme above and below this average.
  - 9 The Proposed Development provides an opportunity for multiple economic and employment benefits to LBTH not only during the construction process, but also in the future through the provision of jobs, homes, and contributions to the community. The scheme could accommodate 328 jobs on-site dependent on how the flexible space (A1-A4/B1/D1/D2) is occupied once operational.
  - 10 Up to £7.6 million per annum in additional spending in the area from residents and employees to boost the local economy.

- 11 The creation of new pedestrian and vehicular links through the Site, enhancing permeability and accessibility of a site that is currently closed and inaccessible to the public.
- 12 The Proposed Development comprises a high quality and sustainable design that respects the evolving surrounding context and optimises the Site by creating new homes and jobs that would directly support the economic growth and competitiveness of the capital and support the regeneration of inner London generally.

- 8.4 In this context, it is also relevant to consider the economic and social sustainability opportunities that could be delivered by the Applicant specifically at this Site.
- 8.5 The Applicant (St William Homes LLP) is a joint venture between the Berkeley Group and National Grid Property Holdings Ltd ('National Grid') with the objective of bringing forward gasworks/holder sites for residential development.
- 8.6 The Berkeley Group has a history of achieving economic and social sustainability objectives through recognised and tested programmes providing benefit to their local communities. These programmes and activities will be applied to the Site to ensure not only that the environment will be enhanced, but that the commitment by the Applicant to engage with and enhance the local community will be of benefit in social and economic terms.
- 8.7 The Berkeley Group Economic Contribution Report (2014) demonstrated that every home they build sustains 5.6 jobs; on this Site that equates to approximately 8,000 jobs. In addition to jobs sustained by new development, during construction the Applicant will be adopting the principles of The National Skills Academy for Construction to develop and implement an Employment and Skills Strategy through on-site training.
- 8.8 More widely, the Berkeley Foundation has committed more than £13 million to the voluntary sector in London and the South of England and supported more than 15,000 people to move out of homelessness, build their skills, move into work or access new opportunities. Almost 60% of staff across the Berkeley Group do something to contribute to the Foundation each year, and between them they have raised £4.4 million for their charitable partners.
- 8.9 On the basis of the above, LBTH should apply the presumption in favour of sustainable development and grant planning permission for the Planning Application.

# Appendix 1 Adopted and Emerging London Plan Policies

## London Plan (2016)

- Policy 2.13 Opportunity Area and Intensification Areas
  - Policy 3.3 Increasing Housing Supply
  - Policy 3.4 Optimising Housing Potential
  - Policy 3.5 Quality and Design of Housing Developments.
  - Policy 3.6 Children and Young People
  - Policy 3.7 Large Residential Developments
  - Policy 3.8 Housing Choice
  - Policy 3.9 Mixed and Balanced Communities
  - Policy 3.11 Affordable Housing Targets
  - Policy 3.12 Negotiating Affordable Housing
  - Policy 3.13 Affordable Housing Thresholds
  - Policy 3.16 Protection and enhancement of social infrastructure
  - Policy 3.17 Health and Social Care Facilities
  - Policy 3.18 Education Facilities
  - Policy 4.2 Offices
  - Policy 4.3 Mixed use Development and Offices
  - Policy 4.5 London's Visitor Infrastructure
  - Policy 4.7 Retail and Town Centre Development
  - Policy 4.12 Improving Opportunities for All
  - Policy 5.2 Minimising Carbon Dioxide Emissions
  - Policy 5.3 Sustainable Design and Construction
  - Policy 5.4A Electricity and Gas Supply
  - Policy 5.5 Decentralised Energy Networks
  - Policy 5.6 Decentralised Energy in Development Proposals
  - Policy 5.7 Renewable Energy
  - Policy 5.9 Overheating and Cooling
  - Policy 5.10 Urban Greening
  - Policy 5.11 Green Roof and Development Site Environs
  - Policy 5.12 Flood Risk Management
  - Policy 5.13 Sustainable Drainage
  - Policy 5.14 Water Quality and Wastewater Infrastructure
  - Policy 5.15 Water Use and Supplies
  - Policy 5.17 Waste Capacity
-

- Policy 5.18 Construction, Excavation and Demolition Waste
- Policy 5.19 Hazardous Waste
- Policy 5.21 Contaminated Land
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.12 Road Network Capacity
- Policy 6.13 Parking
- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing out Crime
- Policy 7.4 Local Character
- Policy 7.5 Public Realm
- Policy 7.6 Architecture
- Policy 7.7 Location and Design of Tall and Large Buildings
- Policy 7.8 Heritage Assets and Archaeology
- Policy 7.11 London View Management Framework
- Policy 7.12 Implementing the London View Management Framework
- Policy 7.14 Improving Air Quality
- Policy 7.15 Reducing and Managing Noise
- Policy 7.19 Biodiversity and Access to Nature
- Policy 7.21 Trees and Woodlands

### **Emerging London Plan (2019)**

- Policy GG1 Building Strong and Inclusive Communities
  - Policy GG2 Making the Best Use of Land
  - Policy GG3 Creating a Health City
  - Policy GG4 Delivering the Homes Londoners Need
  - Policy GG5 Growing a Good Economy
  - Policy SD1 Opportunity Areas
  - Policy SD6 Town Centres and High Streets
  - Policy SD7 Town Centres: Development Principles and Development Plan Documents
  - Policy SD8 Town Centre Network
  - Policy SD9 Town Centres: Local Partnerships and Implementation
  - Policy SD10 Strategic and Local Regeneration
  - Policy D1 London's Form, Character and Capacity for Growth
  - Policy D2 Infrastructure Requirements for Sustainable Densities
  - Policy D3 Optimising Site Capacity through the Design-Led Approach
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- Policy D4 Delivering Good Design
  - Policy D5 Inclusive Design
  - Policy D6 Housing Quality and Standards
  - Policy D7 Accessible Housing
  - Policy D8 Public Realm
  - Policy D9 Tall Buildings
  - Policy D11 Safety, Security and Resilience in Emergency
  - Policy D12 Fire Safety
  - Policy D13 Agent of Change
  - Policy D14 Noise
  - Policy H1 Increasing Housing Supply
  - Policy H3 Meanwhile Use as Housing
  - Policy H4 Delivering Affordable Housing
  - Policy H5 Threshold Approach to Applications
  - Policy H6 Affordable Housing Tenure
  - Policy H7 Monitoring of Affordable Housing
  - Policy H10 Housing Size Mix
  - Policy H11 Build to Rent
  - Policy H15 Purpose-Built Student Accommodation
  - Policy H16 Large-Scale Purpose-Built Shared Living
  - Policy S2 Health and Social Care Facilities
  - Policy S3 Education and Childcare Facilities
  - Policy S4 Play and Informal Recreation
  - Policy S5 Sport and Recreation Facilities
  - Policy E1 Offices
  - Policy E2 Low-Cost Business Space
  - Policy E3 Affordable Workspace
  - Policy E10 Visitor Infrastructure
  - Policy E11 Skills and Opportunities for All
  - Policy HC1 Heritage Conservation and Growth
  - Policy HC3 Strategic and Local Views
  - Policy HC4 London View Management Framework
  - Policy HC5 Supporting London's Cultural and Creative Industries
  - Policy HC7 Protecting Public Houses
  - Policy G1 Green Infrastructure
  - Policy G4 Open Space
  - Policy G5 Urban Greening
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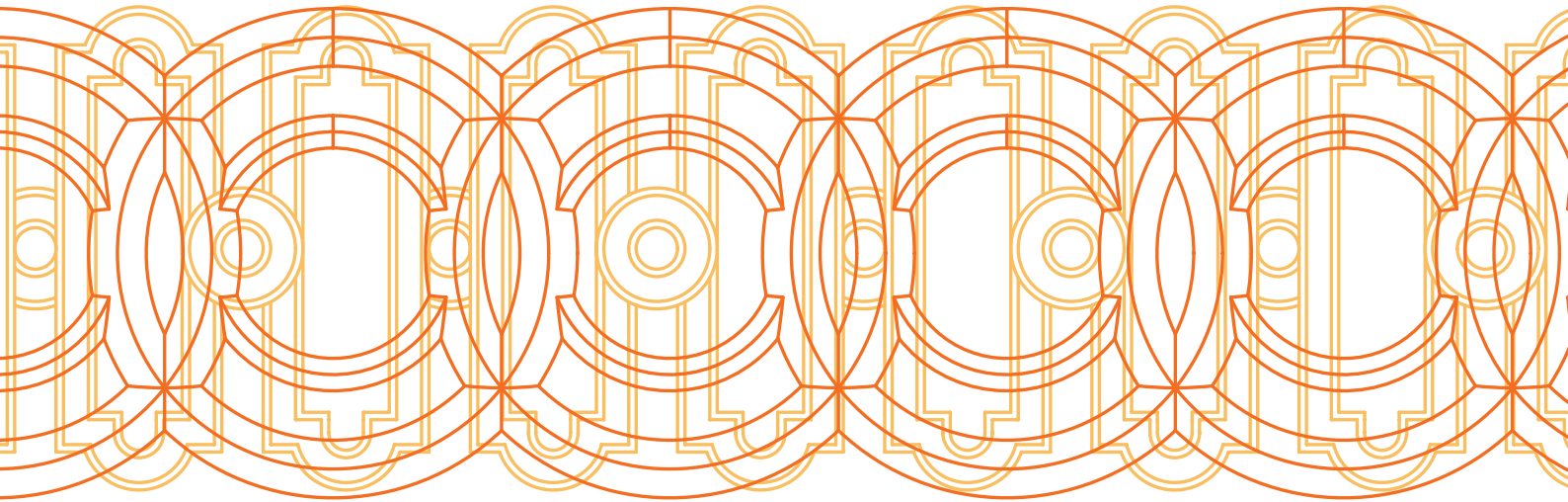
- Policy G6 Biodiversity and Access to Nature
  - Policy G7 Trees and Woodlands
  - Policy G9 Geodiversity
  - Policy SI1 Improving Air Quality
  - Policy SI2 Minimising greenhouse gas emissions
  - Policy SI3 Energy Infrastructure
  - Policy SI4 Managing Heat Risk
  - Policy SI5 Water Infrastructure
  - Policy SI7 Reducing Waste and Supporting the Circular Economy
  - Policy SI8 Waste Capacity and net waste self-sufficiency
  - Policy SI12 Flood Risk Management
  - Policy SI13 Sustainable Drainage
  - Policy SI14 Waterways – Strategic Role
  - Policy SI16 Waterways – Use and Enjoyment
  - Policy SI17 Protecting and Enhancing London’s Waterways
  - Policy T2 Healthy Streets
  - Policy T3 Transport Capacity, Connectivity and Safeguarding
  - Policy T4 Assessing and Mitigating Transport Impacts
  - Policy T5 Cycling
  - Policy T6 Car Parking
    - Policy T6.1 Residential parking
    - Policy T6.2 Office parking
    - Policy T6.3 Retail parking
  - Policy T7 Deliveries, Servicing and Construction
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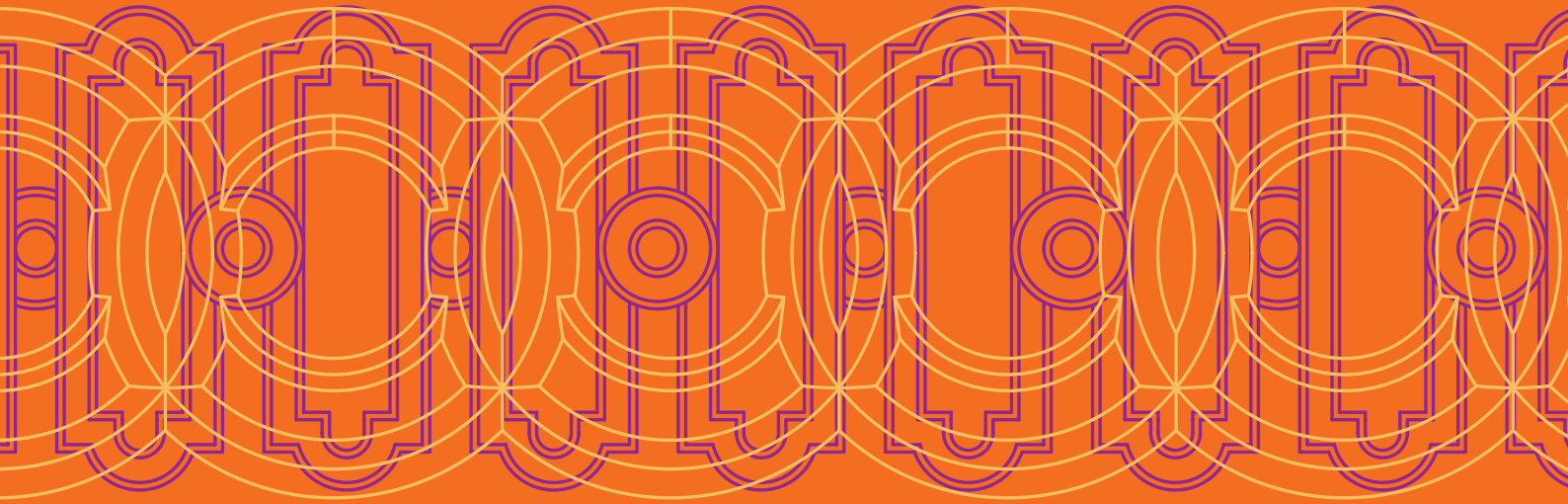
## Appendix 2 Tower Hamlets Local Plan Policies (2020)

The following policies are of particular relevance to the application site:

- Policy S.SG1 Areas of Growth and Opportunity within Tower Hamlets
  - Policy S.SG2 Delivering Sustainable Growth in Tower Hamlets
  - Policy D.SG3: Health Impact Assessments
  - Policy D.SG4: Planning and Construction of new development
  - Policy D.SG5: Developer contributions
  - Policy S.DH1 Delivering High Quality Design
  - Policy D.DH2 Attractive Streets, Spaces and Public Realm
  - Policy S.DH3 Heritage and the Historic Environment
  - Policy D.DH4: Shaping and managing views
  - Policy D.DH7 Density
  - Policy D.DH8 Amenity
  - Policy D.DH9 Shopfronts
  - Policy S.H1 Meeting Housing Needs
  - Policy D.H2 Affordable housing and housing mix
  - Policy D.H3 Housing Standards and Quality
  - Policy S.EMP1: Creating investment and jobs
  - Policy D.EMP2: New employment space
  - Policy S.TC1 Supporting the Network and Hierarchy of Centres
  - Policy TC3 Retail Outside our Town Centres
  - Policy D.TC5: Food, drink, entertainment and the night-time economy
  - Policy D.CF4 Public Houses
  - Policy S.OWS1: Creating a network of open spaces
  - Policy S.OWS2: Enhancing the network of water spaces
  - Policy D.OWS3: Open space and green grid networks
  - Policy D.OWS4: Water spaces
  - Policy S.ES1 Protecting and Enhancing our Environment
  - Policy D.ES2 Air Quality
  - Policy D.ES3 Urban Greening and Biodiversity
  - Policy D.ES4 Flood Risk
  - Policy D.ES5 Sustainable Drainage
  - Policy D.ES6: Sustainable water and waste water management
  - Policy D.ES7 A Zero Carbon Borough
  - Policy D.ES8 Contaminated Land and Storage of Hazardous Substances
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- Policy D.ES9 Noise and Vibration
- Policy D.ES10 Overheating
- Policy S.TR1 Sustainable Travel
- Policy D.TR2 Impacts on the Transport Network
- Policy D.TR3 Parking and Permit-Free
- Policy D.TR4 Sustainable Delivery and Servicing





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**St William**  
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