



STURTS

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PLANNING STATEMENT

DP9 LTD ON BEHALF OF ACCESS SELF STORAGE
STURT'S YARD, 48 EAGLE WHARF ROAD, HACKNEY, PLANNING APPLICATION
SEPTEMBER 2018

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Ltd ('DP9') on behalf of Access Self Storage ('the Applicant') in support of a planning application for the redevelopment of the existing self-storage facility at 48 Eagle Wharf Road, London, N1 7ED ('the Site'). The Site forms a broadly rectangular parcel of land to the immediate south of Regent's Canal. The Site is bound to the east by a two-storey warehouse building occupied by the Archive and Research Centre of the Museum of London Archaeological Service. The Site is bound to the west by Holborn Studios, a film & photography studio and restaurant with an extant planning permission for wholesale re-development.
- 1.2 The Site comprises four two-storey warehouse buildings used entirely for Class B8 storage purposes. The Site currently offers limited employment creation, representing ineffective use of land, whilst the existing buildings fail to engage with the canalside or Eagle Wharf Road frontage. The Proposed Development seeks to demolish the existing buildings and redevelop the site to provide a mixed-use scheme comprising a new self-storage facility (Class B8), office accommodation (Class B1), 141 residential units (Class C3) and a café (Class A3). The description of development is set out below:
- "Redevelopment of the site to provide a mixed-use scheme comprising blocks of 2 to 9 storeys and accommodating a self-storage facility (B8) at lower basement, basement and ground floor level, office accommodation (B1) at basement, ground and first floor level, and 141 residential units at second to eighth floor, as well as a cafe (A3) at ground and first floor level, landscaped communal gardens, pedestrian link route to the Regents Canal and other associated works."*
- 1.3 In addition, the Proposed Development will provide substantial improvements to the public realm and canal frontage, including the provision of a pedestrian route through to the Regent's Canal.
- 1.4 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including planning and design officers at the London Borough of Hackney (LBH), the Greater London Authority (GLA), the London Borough of Islington (LBI), Historic England, the Hackney Society, Regent's Network, Canal & River Trust, ward councillors, local residents and other property owners and businesses and stakeholders.
- 1.5 This Statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. In addition to this Statement, the following supporting documents have been submitted:

- Planning Application Form and Certificates, prepared by DP9;
- CIL Additional Information Form, prepared by DP9;
- Site Location Plan, prepared by Studio Egret West;
- Existing and Proposed Drawings, prepared by Studio Egret West;
- Design & Access Statement, prepared by Studio Egret West.
- Inclusive Design Statement, prepared by Buro Happold;

- Stage 1 Geo-Environmental Site Assessment, prepared by RSK (Appendix E of Structural Report, prepared by Alan Baxter Associates);
- Retail Impact Assessment, prepared by DP9 (Appendix 1 of this Statement);
- Draft Affordable Workspace Statement, prepared by DP9 (Appendix 2 of this Statement);
- Heritage Statement, prepared by Alan Baxter Associates;
- Transport Assessment (including draft Travel Plan), prepared by Alan Baxter Associates;
- Construction Management Plan, prepared by Maclaren;
- Operational Waste Management Strategy, prepared by Waterman Group;
- Design Stage Site Waste Management Plan, prepared by Waterman Group;
- Townscape and Visual Impact Assessment, prepared by Peter Stewart Consultancy and Cityscape;
- Energy Statement, prepared by Foreman Roberts;
- Sustainability Report: BREEAM, prepared by Foreman Roberts;
- Daylight and Sunlight Assessment, prepared by EB7;
- Noise Impact Assessment, prepared by SRL Technical Services;
- Air Quality Statement, prepared by SRL Technical Services;
- Preliminary Ecological Assessment, prepared by PJC Consultancy;
- Statement of Community Involvement, prepared by Polity;
- Structural Engineering Notes in support of the Planning Application, prepared by Alan Baxter Associates;
- Flood Risk Assessment and SUDS Strategy, prepared by Alan Baxter Associates;
- Archaeological Desk Based Assessment, prepared by CgMs;
- Health Impact Assessment, prepared by Jon Dingle Ltd; and
- Financial Viability Assessment, prepared by DS2 LLP.

Structure of the Statement

1.7 This document provides an overview of the Site and the Proposed Development and sets out a justification for the development. The Planning Statement takes the following form:

- **Section 2** provides a description of the Site and surrounding area;
- **Section 3** sets out a summary of the Proposed Development;
- **Section 4** summarises the consultation process;
- **Section 5** summarises the relevant national, regional and local planning policy;
- **Section 6** assesses the Proposed Development against the provisions of the development plan and other planning policy and material considerations;
- **Section 7** sets out the Draft Section 106 Heads of Terms; and
- **Section 8** sets out the overall conclusions.

- 1.8 Overall, the Site represents a significant opportunity to deliver a scheme of the highest architectural quality which enhances the character and appearance of the surrounding Conservation Area, with increased employment offer and the delivery of a significant number of much-needed residential units towards the Borough's housing stock.

2. SITE AND SURROUNDING AREA

- 2.1 Situated in the London Borough of Hackney, the Site comprises a broadly rectangular 0.52ha parcel of land to the north of Eagle Wharf Road and to the south of Regent's Canal. The Site is bound to the east by a two-storey warehouse building occupied by the Archive and Research Centre of the Museum of London Archaeological Service. The Site is bound to the west by Holborn Studios, a film & photography studio and restaurant with an extant planning permission for wholesale re-development. There are three canal barge moorings along the length of the Site's canal edge.
- 2.2 The Site is currently occupied by the applicant, Access Self Storage, as a self-storage facility (Class B8). The Site comprises four warehouse buildings, providing a total of 9,498 sqm GIA of Class B8 floorspace, in addition to 10 surface-level car parking spaces for employee and customer use.
- 2.3 The main warehouse building is a single-storey light metal frame warehouse building which also serves as a reception area and employee office. Constructed in 2002, the building is set back from the Eagle Wharf Road frontage and abuts the north boundary of the site along the Regent's Canal. To the south of the main building is a two-storey concrete warehouse dating from 1937. The main elevation of the building fronts onto Eagle Wharf Road, with a roller shutter providing an additional access to the warehouse. To the immediate east of the 1937 warehouse is a narrow 1960's brick building extending to two storeys in height. The building also fronts directly onto Eagle Wharf Road, with a roller shutter and entrance providing direct access to the building. To the rear of the brick building is a small Victorian warehouse. Dating from around 1860, the building comprises a gable ended, brick built building with a wrought iron trussed roof (which is to be retained and repurposed in the proposed scheme).
- 2.4 The Site is situated within the Regent's Canal Conservation Area. None of the buildings on site are listed, nor are they considered to be of any architectural merit. Both the Victorian building and the 1937 warehouse are considered to be of little heritage significance, given that both buildings have been heavily altered and are generally poor state of disrepair. Sturt's Lock to the immediate north of the Site is also designated as a Structure of Townscape Merit.

Accessibility

- 2.5 Vehicular and pedestrian access to the site is provided from a gated entrance from Eagle Wharf Road. There is currently no public access to the canal from Eagle Wharf Road via the Site.
- 2.6 The Site is located in an area having a PTAL of between 2 and 4 however, as outlined in the supporting Transport Statement, the location of the Site is considered to be more representative of PTAL 4.
- 2.7 Essex Road Station is situated 0.6 miles (12-minute walk) to the north, whilst Old Street Station is situated 0.6 miles (13-minute walk) to the south. New Road to the east is served by bus nos. 21, 76, 141 and 271.

Surrounding Area

- 2.8 The Site is located within a Primary Employment Area (PEA), a Core Growth Area as identified within the City Fringe Opportunity Area and one of LBH's Tall Building Opportunity Areas identified in the LB Hackney Core Strategy. Regent's Canal, which bounds the Site to the north, is identified as Site of Importance for Nature Conservation (SINC) and is designated as a Green Link, Green Corridor and Open Space by LBH.
- 2.9 The area along the canal is predominately mixed use in character, comprising a range of residential and commercial uses. The prevalent building height in the immediate surrounding area is between 2-6 storeys, however there are examples of buildings which extend beyond this height in the wider area, namely Gainsborough Studios to the east (12 storeys). The areas to the north and to the south of the Site are generally residential in character, with a mix of traditional terraces and modern, purpose-built apartment blocks.

Planning History

- 2.10 A review of the planning history of the Site indicates that there is no recent relevant planning history for the Site.
- 2.11 With regards to the wider context, planning permission was granted in November 2016 (Ref: 2015/2596) for the redevelopment of Holborn Studios, situated to the immediate west of the Site. Planning permission was granted for a mixed-use scheme extending to seven storeys, accommodating 5,644 sqm of commercial floorspace, 50 residential units, and a 127 sqm café (A3) at ground floor level. This permission has been subject to challenge under Judicial Review. As a result, an identical application was submitted in October 2017 (Ref: 2017/3511), which is yet to be determined.

3. PROPOSED DEVELOPMENT

3.1 This section should be read in conjunction with the proposed application drawings, Design and Access Statement and Landscape Strategy which are submitted to accompany the application and describe the principal components of the Development.

3.2 The planning application seeks full planning permission for:

“Redevelopment of the site to provide a mixed-use scheme comprising blocks of 2 to 9 storeys and accommodating a self-storage facility (B8) at lower basement, basement and ground floor level, office accommodation (B1) at basement, ground and first floor level, and 141 residential units at second to eighth floor, as well as a cafe (A3) at ground and first floor level, landscaped communal gardens, pedestrian link route to the Regents Canal and other associated works.”

Summary of Works

3.3 As detailed above, the Proposed Development will play an important role at both strategic and local level. The development of the Site will deliver a significant quantum of new employment floorspace (Class B1 & B8), a substantial number of Build to Rent (BTR) residential units (Class C3), new café and significant public realm improvements in a high-quality development that will regenerate the Site, contribute invaluable towards the local employment and housing market, and deliver the objectives of the City Fringe Opportunity Area in a prominent canalside location. A summary of the proposed works has been outlined below:

3.4 All existing structures will be demolished, and the existing iron roof trusses will be retained and repurposed in the proposed central square.

- Demolition of the existing warehouse buildings and retention and repurposing of the iron roof trusses in the proposed central square.
- Replication of the 1937 concrete façade fronting Eagle Wharf Road.
- Erection of four blocks ranging from two to nine storeys (five-six storeys, with two-three storey pitched roofs), comprising 141 residential units, Class B1 office accommodation and a ground floor café fronting the canal.
- Creation of two service yards to the east and west of the proposed central Sturt's Yard, providing commercial and residential car parking and service access.
- Communal gardens on the roof of the replicated two-storey structure, and on the flat roof areas of the proposed blocks.
- Creation of a pedestrianised square at the centre of the site, and a pedestrian link from Eagle Wharf Road through to the Regents Canal, with new public realm, planting, seating and lighting.
- Biodiversity and ecological improvements across the site.
- Provision of 13 car parking spaces at ground floor level, including five blue badge spaces.

Layout and Design

- 3.5 The proposed buildings range from 2 to 9 stories, with the tallest adjacent to Sturt's Lock. The built 'shoulders' reach 6 stories on the canalside and 5 stories on Eagle Wharf Road. Two basement levels are occupied in the main by storage space, maintaining this use on the Site. A section of basement Level 1, Ground and first floor levels are in commercial (B1 use) use. Upper floors provide residential accommodation (141 units in total), all with views of the outdoor amenity space and the majority with views to Regent's Canal and Sturt's Lock.
- 3.6 The tallest elements run north/west - south/east, their alignment recalling that of the pitched roof Victorian warehouses once found on the Site. The gabled roof form of those warehouses is reinterpreted in the form of two pairs of steeply pitched roofs. The proportions of these buildings make reference to the pitched geometry of the Holborn Studios chimney. Their 3-storey, flat-topped pitched roofs are clad in an extruded tube rainscreen system. The floors below are timber and brick-clad with glazing and projecting blackened steel or aluminium frames.
- 3.7 The flat-roofed shoulder blocks are clad in formal brick piers of white/cream/red blends to reflect the surrounding brick tones. Both the frame and metalwork will be worked in detail to reference the iron and brass detailing of the Site's past.
- 3.8 The courtyard space that forms part of the public route through the Site is located where the historic loading dock was once found. It will feature re-purposed Victorian roof trusswork sourced from the remaining warehouse on the Site. Ironwork details throughout the public realm will serve to remind users of the site's industrial past. Its landscape character will be naturalistic, reinforcing the existing character surrounding Sturt's Lock. Activating the public realm will be work yards, workspace, a café and residential facilities.
- 3.9 Workers share access to ground level yards in the west and east of the site for rest and socialising. Residents share an entrance lobby, lounge and various outdoor communal terraces in addition to their private balconies for play, rest and socialising. All spaces incorporate the exposed truss and ironwork detail seen elsewhere. All tenants have access to shared, secure and covered cycle space

Landscaping and Public Realm

- 3.10 The ground floor will be divided into a number of private and public outdoor spaces. At the centre of the scheme is Sturt's Yard, which will become the centre for the new development, providing access between the canal and Eagle Wharf Road. The Yard will be framed by the reclaimed trusses, with climbing plants located around the base of each of the truss leg in a plant bed. Large potted trees and plants will be used to retain a level of flexibility to the space, whilst a combination of movable furniture and permanent long tables will create a variety of social spaces. Textured cobbles are proposed for the surface material.

- 3.11 Two working yards will be located either side of Sturt's Yard. Both these spaces will accommodate private parking and access for delivery vehicles. A series of skylights are proposed within the eastern yard in order to allow light into office space below. Painted graphics will be used to animate these yards, contrasting with the concrete, steel and brick.
- 3.12 The canal edge surrounding Sturt's Lock is owned by The Canal & River Trust. Landscaping and tree replacement improvements to this canal edge will be secured under a s106 agreement with LBH and the Canal & River Trust. In order to make the canal fully accessible, a number of existing trees and areas of planting will be need to be removed. It is proposed to replicate the naturalistic, wild nature of planting, which is important to the character of Regents Canal. The public route along the canal edge would terminate at the north-eastern corner until the development to the east extends this public link.
- 3.13 It is proposed to enhance the ecological value of the canal side by introducing a number of native, fruiting species within planting to provide a species-rich food source, nesting opportunity and ground cover for birds, as well as attracting a variety of insects. It is also proposed to provide two Schwegler 1B bird boxes and one Schwegler 1SP sparrow terrace to enhance nesting opportunities for house sparrows, a red list species (Birds of Conservation Concern). Replacement trees will secure green infrastructure. Lighting will be limited to downward facing wall mounted lights, and will only be located where main pedestrian routes are located.
- 3.14 The proposed second floor will include three spaces accessible to residents, each with a different character based around how it will be used. At the centre is the social terrace, which will be covered by a reclaimed truss frame. Adjacent to Block D is the planting terrace, with a water terrace situated between Block A and B.
- 3.15 The proposed south-facing fifth-floor gardens will provide an additional space for residents, with views towards Eagle Wharf Road. Boundary planting will ensure privacy for private balconies.

Proposed Land Uses and Floor Areas

- 3.16 A total breakdown of proposed floorspace is provided in Table 1 below. An assessment of the proposed uses against planning policy is set out in Section 5.0 of this Statement.

Use	Proposed (GIA sqm)	Proposed (GEA sqm)
Residential (C3)	11,584	12,816
Office (B1)	4,600	4,977
Self-Storage (B8)	7,235	7,905
Café (A3)	219	241
Total	23,639	25,939

3.17 The proposed residential unit mix is outlined below:

	Studio	1 bed	2 bed	3 bed	4 bed	Total
Number of units	26	62	47	4	2	141
%	18%	44%	34%	2%	2%	100%

Car and Cycle Parking

3.18 It is proposed to provide 13 surface-level car parking spaces. The proposed car parking provision is as follows:

- Office/Self-Storage – 1 space;
- Residential – 5 accessible spaces;
- Self-Storage – 3 spaces; and
- Self-Storage – 4 spaces for LGVs.

3.19 It is proposed to provide a total of 442 cycle spaces across the Site, allocated at ground floor and basement Level 2. The proposed cycle parking provision is as follows:

- Café – 6 spaces;
- Office Long Stay – 80 spaces;
- Office Short Stay – 8 spaces;
- Self-Storage Short Stay – 11 spaces;
- Residential Long Stay – 257 spaces;
- Residential Short Stay – 44 spaces; and
- Public Short Stay – 36 spaces.

Servicing

3.20 The proposed residential blocks will benefit from their own dedicated waste storage areas accessed directly from the stair/lift cores. All waste stores will have suitable sealed surfaces and water points located practically for maintenance and cleaning. Adequate space is provided in each store for residual and recyclable waste, in accordance with London Plan standards.

3.21 All residential waste bins will be collected by LBH once a week, when the residential waste will be transferred to temporary holding areas via wheeled Eurobins to ensure that they are within close proximity of the collection vehicles.

3.22 The proposed commercial spaces are expected to generate a range of wastes that will be collected by a private contractor, scheduled by agreement so as not to conflict with the Waste Management Plan. The commercial refuse store can be accessed directly via the Central Yard to ensure bulky refuse can be easily collected by commercial refuse collection vehicles.

Highways Proposals (s278 Works)

- 3.23 It is proposed to provide three points of vehicle access which will each require a new vehicle crossover of the footway along Eagle Wharf Road. The proposed works along the footway will reconcile the existing and proposed vehicle crossovers and include a making good of the footway to LBH's specification.
- 3.24 These works are outside of the redline boundary for the site and it is anticipated that these will form part of a s278 highway agreement following determination and consultation with LBH.

Sustainability

- 3.25 The proposed development incorporates use of green technologies such as photovoltaic panels for the residential element of the development. The installation of photovoltaic panels to supply heating and cooling for the non-domestic units will reduce the development's regulated CO2 emissions (refer to CHP). The development is expected to reduce regulated CO2 emissions by 31.2% when compared to a notional development built to current Part L Building Regulations (2013). It is proposed that the regulated CO2 emissions will be offset through a s106 contribution payment. The development will meet BREEAM 'Excellent' for the B1 Office spaces.
- 3.26 It is proposed to incorporate bio-diverse planting, ecological measures and a green roof within the development to further enhance the sustainability of the development. The proposed scheme will also include the use of energy efficient lighting, low flow water fittings to increase water efficiency, and recycling facilities for operational waste.
- 3.27 For further information, please refer to the BREEAM pre-assessment document included within the application.

4. PRE-APPLICATION CONSULTATION

- 4.1 This Section should be read in conjunction with the Statement of Community Involvement, prepared by Polity, which is submitted in support of the planning application.
- 4.2 The Proposed Development has been informed by pre-application discussions held including planning and design officers at the London Borough of Hackney (LBH), the Greater London Authority (GLA), the London Borough of Islington (LBI), Historic England, the Hackney Society, Regent's Network, Canal & River Trust, ward councillors, local residents and other property owners and businesses and stakeholders.
- 4.3 All matters associated with the Proposed Development were discussed at length at the pre-application stage, with early engagement helping to inform the overall scheme design.

Mayoral Referral

- 4.4 The application is referable to the Greater London Authority (GLA) as it exceeds the relevant thresholds set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended). Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant and the Council.

Pre-Application Discussions

- 4.5 Formal pre-application discussions have been held with the Council and the GLA on the evolving scheme since November 2016 in accordance with an agreed Planning Performance Agreement (PPA). The meetings have focused a plethora of topics, including the following:
- The principle of development and appropriate land uses;
 - Townscape and height;
 - Relationship to heritage assets;
 - Architectural approach;
 - Employment offer;
 - Affordable workspace;
 - Housing tenure, mix, layout, and residential quality;
 - Affordable housing;
 - Transport and accessibility;
 - Public realm and landscaping, including the canalside setting;
 - Environmental considerations (including Energy and Sustainability);
 - Daylight, sunlight and overshadowing; and
 - Viability and Section 106.
- 4.6 The emerging proposals for the Development were also presented to the Council's Design Review Panel in April 2017. The feedback from the pre-application

discussions with the Council has been positive and the scheme has developed in response to these discussions.

Statutory Consultee Consultation

4.7 In addition to regular pre-application meetings with the Council and GLA, contact has been made with key statutory consultees in respect of various aspects of the Proposed Development, including:

- London Borough of Islington;
- Historic England;
- The Hackney Society;
- The Regent's Network;
- The Arlington Association;
- Local Ward Councillors;
- Executec (Holborn Studios);
- Canal & River Trust;
- The Angel Wharf Residents Association; and
- The City of London (Museum of London Archives).

Public Consultation

4.8 Public consultation is described in detail in the Statement of Community Involvement (SCI), prepared by Polity, that accompanies this planning application. In summary, an extensive process of consultation was undertaken to initiate a dialogue between the Applicant and the key stakeholders and local community in order to understand their objectives, aspirations and expectations, which have helped inform the evolution of the Development.

4.9 In advance of submission of the planning application, the project team held two public exhibitions on Thursday 13th July between 3pm and 7pm and on Saturday 22nd July between 10am and 1pm at Access Self Storage, 48 Eagle Wharf Road, Hackney, N1 7ED.

4.10 In total, 66 people attended the exhibition, all of whom were offered a feedback form to complete. To date, 31 forms have been received, many of which were supportive of the proposals.

Key Themes from the Consultation Process

4.11 Throughout the consultation process, the scheme has evolved as per the comments from the Council, statutory consultees and the public. Section 5 of the Design and Access Statement set out the key areas where the design has changed, which include:

- Reduction in height and amendments to the articulation of the proposed buildings.

- Protection of views within the Conservation Area, particularly towards the Holborn Studio's chimney.
- Changes to the mix of land uses to ensure an employment-led development.
- Refinements and enhancements to the roof and elevations.
- Refinement of public realm and landscaping.

4.12 Overall there was support from the public consultation for the scheme design, the proposals for the pedestrian access to the canalside and the provision of office accommodation. Following the submission of the planning application the Applicant remains committed to consulting and engaging with local residents, businesses and other stakeholders. The intention is to maintain the dialogue with those individuals and organisations who have expressed an interest in the scheme and to keep people up to date with the project.

5. PLANNING POLICY CONTEXT

Planning Policy Framework

- 5.1 The purpose of this Section is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application for the development, and against which the proposals have been considered during design development. An analysis of the key policies and tests relating to the principle of the Development is therefore included in the relevant sections of this Statement.

National Planning Policy

- 5.2 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted on 24 July 2018. At the heart of the NPPF is a presumption in favour of sustainable development (para 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework. This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

The Development Plan

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.4 The statutory development plan for the Site comprises the following:
- The Consolidated London Plan (March 2016);
 - LBH Core Strategy (November 2010) ('CS');
 - LBH Development Management Local Plan (July 2015) ('DMLP');
 - LBH Site Allocations Local Plan (July 2016) ('SALP').
- 5.5 The Development Plan policies referred to in this Planning Statement carry full weight in the decision-making process as they are consistent with the National Planning Policy Framework.
- 5.6 The Mayor is in the process of preparing a new London Plan. On 13th August 2018, the Mayor published the 'Draft New London Plan showing Minor Suggested Changes', which incorporates clarifications, corrections and factual updates to the previous draft to help inform the upcoming Examination in Public. The examination hearing sessions are to take place early-2019, with adoption of the new London Plan anticipated late-2019. The proposed scheme has been assessed against the draft policies, where relevant.

- 5.7 LBH is also in the process of preparing a new Local Plan, known as LP33. This document, once adopted, will form the Borough's Development Plan, replacing the Core Strategy, Development Management Local Plan, and Site Allocations Local Plan. The latest draft of the new Local Plan document was published for consultation in October 2017, with the next draft expected late-2018. Given that the new Local Plan is in the early stages of preparation, it has been afforded limited weight.
- 5.8 LBH has also prepared a number of Supplementary Planning Documents (SPDs), including the Affordable Housing SPD (2005) and Affordable Housing Interim Position Statement (2011), and Planning Contributions SPD (2015). Where relevant these documents have been considered.
- 5.9 The GLA has produced a number of documents which provide more detailed strategic guidance on London Plan policies and are relevant to the Proposed Development. These include:
- Housing SPG (March 2016);
 - Affordable Housing and Viability SPG (August 2017);
 - City Fringe Opportunity Area Planning Framework (December 2015);
 - Sustainable Design and Construction SPG (2014);
 - The Mayor's Energy Strategy (February 2004);
 - Sustainable Design and Construction SPG (May 2006);
 - Shaping Neighbourhoods: Play and Informal Recreation SPG (September 2012);
 - Use of Planning Obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013).
- 5.10 Where relevant within the supporting application documents these guidance notes have been referred to.

Site Designations

- 5.11 The site is subject to the following designations as identified in the Core Strategy and Development Management Proposals Maps:
- Priority Employment Area (PEA);
 - Tall Building Opportunity Area; and
 - Regents Canal Conservation Area.
- 5.12 It is important to note that the Regents Canal, which bounds the Site to the north, is identified as Site of Importance for Nature Conservation (SINC) and is designated as a Green Link, Green Corridor and Open Space by LBH.
- 5.13 Within the London Plan the site has the following designations:
- City Fringe Opportunity Area; and
 - Core Growth Area within the CFOA.

6. PLANNING POLICY ASSESSMENT

6.1 This section provides an overview of specific considerations in respect of the Proposed Development, which is assessed against the following issues:

- Land Use;
- Residential Standards;
- Affordable Housing;
- Residential Density;
- Design, Heritage and Townscape;
- Residential Amenity;
- Transport and Parking;
- Servicing Arrangements and Refuse Collection;
- Sustainability and Energy;
- Flooding and Drainage;
- Ecology and Biodiversity;
- Impact on Regent's Canal;
- Archaeology; and
- Contamination.

Land Uses

Provision of Employment Floorspace

Policy

6.2 As set out above, the Site is located within the City Fringe, pursuant to the London Plan and LBH's Core Strategy. As a result, both the London Plan and existing and emerging planning policies support the provision of new office and employment floorspace within the area. London Plan Policy 2.13 and draft London Plan Policy SD1 deal with development in Opportunity Areas and the draft City Fringe OAPF identifies the potential for economic growth particularly that associated with the digital-creative sector. Start-up businesses have played a critical role in the establishment of this cluster and continue to attract inward investment and corporate relocations to the area. Core Strategy Policy 3 identifies the City Fringe Opportunity Area as supporting London's financial, leisure and creative activities.

6.3 The Site is also situated within a Priority Employment Area (PEA), where Policy DM17 states that Class B1, B2 and B8 uses are appropriate uses.

6.4 Policy DM15 states that development proposing new business floorspace (Class B1) are required to provide well designed, high quality buildings that incorporate a range of unit sizes and types that are flexible and suitable for subdivision and re configuration for new users and activities.

6.5 Core Strategy Policy 17 states that the Council will encourage economic development, growth and promotion of effective use of land through the identification and

regeneration of sites for employment generating uses, the promotion of employment clusters and the encouragement of mixed use development with a strong viable employment component that meets the identified needs of the area. The Council expects to be able to deliver approximately 407,000sqm of employment floorspace to meet future demand.

- 6.6 Core Strategy Policy 18 stipulates that redevelopment of existing employment land and floorspace may be allowed, as provided for in CS Policy 17 (Economic Development), when it will clearly contribute to addressing worklessness, improving business function and attractiveness, enhancing the specification of business premises, improving the immediate area, increasing the take-up of existing employment floorspace, and meeting the identified up-to-date needs of businesses located, or wishing to locate, in the borough.
- 6.7 The GLA City Fringe Opportunity Area Planning Framework (OAPF) (December, 2015) further encourages a mix of supporting uses such as leisure, retail and commercial floorspace, particularly within Tech City. Strategic Policy 2.D within the OAPF supports proposals for new employment uses, including affordable workspace, that are designed to house a range of business sizes from start-ups to anchor tenants along the canalside.
- 6.8 Policy DM16 states that the Council will seek 10% of the new floorspace within major commercial development schemes in the Borough, and within new major mixed-use schemes in the Borough's designated employment areas, to be affordable workspace, subject to scheme viability. The applicant should submit evidence of agreement to lease the workspace preferably in association with a Council registered workspace provider. Under this preferred option the commercial terms to be agreed between the applicant and Council registered workspace provider are to be secured via legal agreement.

Assessment

- 6.9 The Site is located within a PEA. The Core Strategy identifies that the main purpose of PEAs is to protect and promote business locations in the Borough, especially in areas where clusters are well-established. The proposed land uses, which includes a new Class B8 self-storage facility and Class B1 office accommodation, will complement and enhance the surrounding area, reinforcing the role and identity that the area has within the social, economic and physical make-up of the Borough creating a total of circa 369 jobs (gross). The scheme proposes a total of 7,235 sqm GIA of Class B8 floorspace, in addition to 4,600 sqm GIA of Class B1 office floorspace, which are both considered to be acceptable uses in this location, and therefore in accordance with Policy DM17. Overall, the scheme will result in a significant net increase of 2,337 sqm of employment floorspace, which is in line with the objectives of Core Strategy Policy 18.
- 6.10 The proposed office floorspace has been designed to provide modern, flexible and efficient accommodation for future office occupiers, including hot desks, incubator

and micro studies which are designed to encourage and meet the modern day working of the more creative industries. The high quality, modern and flexible space is therefore in accordance with Development Management Policy DM15.

- 6.11 The Proposed Development will also provide 372 sqm of affordable workspace, equating to 8% of the total office floorspace provision. This space will be offered to a range of occupiers on an affordable basis at below market rents which will be agreed with the LB of Hackney and which will be secured in the accompanying s106 agreement.
- 6.12 The Site is in an important location on the Regent's Canal, situated adjacent to Sturt's Lock. The existing buildings do not fully utilise the Site in a manner which supports the vitality and viability of the canalside or the wider PEA. The quantum and mix of uses across the Site has been reviewed based on scheme viability to ensure that the maximum possible quantum of employment floorspace is provided. The proposed scheme will provide a significant uplift in the contribution that the Site will make to employment generation in Hackney. Further details are provided within the accompanying Viability Appraisal prepared by HEDC Ltd. The Proposed Development is therefore considered to be in accordance with the objectives of Core Strategy Policy CS17, DMLP Policy, and Mayor's vision set out in the City Fringe OAPF.

Principle of Retail Use

Policy

- 6.13 In retail terms, the site is considered out-of-centre and therefore both a sequential and impact assessment will be required. At national level, the NPPF sets out the Government's commitment to securing economic growth in order to create jobs. The planning system should encourage and not act as an impediment to sustainable growth, and local authorities should plan proactively to meet the development needs of business. Planning policies should be positive and promote competitive town centre environments and set out policies for the management and growth of centres, including allocating a range of sites to meet needs for retail, leisure and other uses in full.
- 6.14 Paragraph 86 further states that Local Planning Authorities (LPAs) should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan. Paragraph 89 states that when assessing applications for development involving main town centre uses outside of town centres, which are not in accordance with an up to date Local Plan, LPAs should require an impact assessment if the Proposed Development is over a proportionate, locally-set floorspace threshold (200sqm GIA, as stipulated by Policy DM7).
- 6.15 The National Planning Policy Guidance ("NPPG") further advises that the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. When setting locally appropriate thresholds, the

NPPG states it will be important to consider, inter alia, the scale of the proposals relative to town centres, and the existing viability and vitality of existing town centres and whether they are vulnerable.

- 6.16 Policy 2.15 of the London Plan seeks to ensure that development proposals in town centres should, inter alia: sustain and enhance the vitality and viability of the centre; support and enhance the competitiveness, quality and diversity of town centre retail and be in scale with the centre.
- 6.17 Paragraph 4.47 of the London Plan states that a vibrant a diverse retail sector is essential to London's success, and that it is vital to ensure that Londoners have access to the goods and services that they need.
- 6.18 Policy 4.7 of the London Plan states that in taking planning decisions on proposed retail and town centre development, the following principles should be applied:
- The scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment;
 - 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; and
 - Proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.
- 6.19 At local level, Core Strategy Policy 17 states that PEAs outside town centres will permit new A Class uses, as long as they are auxiliary to business development and where they are not considered to draw trade away from existing retail centres.
- 6.20 Policy DM7 also states that proposals for new, or extension to existing edge or out-of-centre, retail A Class, entertainment or leisure development in excess of 200 sqm gross floorspace will be required to submit a sequential test and an impact assessment demonstrating that there would be no adverse impact on the vitality and viability of all the designated town centres as a whole. The Council will refuse planning permission where there is evidence that the proposals are likely to have significant adverse impacts on the vitality and viability of all the designated town centres as a whole.

Assessment

- 6.21 Given that the Site is situated within a PEA, the proposed provision of a café which is auxiliary to the residential and employment uses is in accordance with Core Strategy Policy 17, which advocates development and intensification of main town centre uses such as retail, restaurant and leisure to meet strategic and local needs, particularly within PEAs.
- 6.22 However, the site itself is still considered to be in an 'out-of-centre' location in NPPF terms. In the context of Policy DM7, we have reviewed the sequential and impact test

in relation to the retail elements of the Proposed Development. As noted within the supporting Retail Assessment prepared by DP9 Ltd (Appendix 1), the proposed café unit space at ground and first floor level is intended to reinforce the attractiveness of the canalside location, whilst complementing the primary office and residential development that will form part of the proposed scheme.

- 6.23 In terms of sequential assessment, our analysis demonstrates that no sites are available, suitable or viable for the Proposed Development within Hoxton Street Local Shopping Centre, which is the closest centre to the site (1.2km to the east). Accordingly, the Applicant has satisfied the requirement to carry out a sequential site assessment per the requirements of paragraph 86 of the NPPF and DMLP Policy DM7.
- 6.24 A health check has also been undertaken, which finds Hoxton Street Local Shopping Centre to be vital and viable, against which very low or negligible trading impacts are expected as a result of the Proposed Development. Given the scale of the Proposed Development and the significant levels of identified floorspace need, there will be no impact on the centre's vitality or viability, nor on proposed and/or committed public or private investment in the centre. Instead, the Proposed Development will add to the vitality and viability of Regent's Canal, by reinforcing and strengthening its offer, and by increasing its attractiveness and footfall along this part of the canal and Eagle Wharf Road.
- 6.25 The Proposed Development therefore passes the impact test and complies with paragraph 89 of the NPPF and the relevant development plan policies (including DMLP Policy DM7).

Principle of Residential Use

Policy

- 6.26 The NPPF (at paragraph 59) sets out the Government's objective of "*significantly boosting the supply of homes*". Paragraph 118 states that decisions should promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing.
- 6.27 At regional level, the London Plan seeks to increase the number of homes across the capital, with a borough target of 1,599 new dwellings per annum over the plan period (until 2021). The draft London Plan includes a revised borough target of 1,330 dwellings per annum. Policy 3.3 explains that that local planning authorities should look to the potential of brownfield land and opportunity areas. Draft Policy H1 reiterates this requirement.
- 6.28 BTR housing is supported by the Government and the Mayor. London Plan Policy 3.8 states that boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that: the planning system provides positive and practical support to sustain the contribution of the BTR in addressing housing needs and increasing housing delivery. The Mayor's Housing SPG explains that:

- 6.29 *“Government and the Mayor support provision of more private rented homes (Policy 3.8B a1) and the 2015 London Plan recognises that the planning system should take a more positive approach in enabling this sector to contribute to the achievement of housing targets. Positive support should be given for long term private rented products through the land use planning system at local as well as strategic level.”*
- 6.30 At local level, Core Strategy Policy 17 states that in PEAs outside of town centres and the CAZ, residential uses will be acceptable, as long as ancillary to the main business and employment uses on a site.
- 6.31 Policy DM19 within the DMLP states there is a general presumption in favour of housing in the Borough. Proposals for new housing development will be permitted provided they would not adversely conflict with other policies in the DMLP or the LBH's Local Development Framework, particularly in relation to design quality, amenity, environmental sustainability, employment land and floorspace, and the Borough's Shopping Centres, the relevant policies of which are set out later in this Planning and Regeneration Statement.
- 6.32 Policy DM17 of the DMLP further notes that residential (Class C3) and retail (Class A1) uses are acceptable within PEAs, providing that they are part of an employment-led scheme and are appropriate to the characteristics and functioning of the Site and will not impact the ongoing operations of businesses in the PEA.

Assessment

- 6.33 The proposed residential units are in compliance with Core Strategy Policy 17 and Policy DM17, as part of an employment-led scheme where the proposed residential use is auxiliary to the proposed employment uses. The split of land uses within the Proposed Development is 51% employment / 49% residential.
- 6.34 The accommodation is located in four blocks which have been well designed to provide a high quality residential living environment and accords with planning policy for the following reasons:
- The scheme helps to meet the LB of Hackney's local housing needs through the delivery of 141 much-needed residential units.
 - It results in an underutilised brownfield site being redeveloped to make most effective use of the Site in line with the NPPF (para 117).
 - It provides a mix of unit sizes, taking into account local needs and accords with the principles of the London Plan and Core Strategy Policy 19.
 - It is demonstrated below that the proposed residential units are of the highest quality, with access to private and communal amenity space, car and cycle parking, and excellent levels of residential amenity in an attractive canalside location.

- 6.35 In summary, the Site is located within an accessible area that is characterised by a mix of commercial and residential uses. The provision of 141 residential BTR units will contribute towards meeting the Borough's housing needs and will facilitate a significant quantum of employment floorspace to be provided, thereby ensuring that a viable mix of uses can be delivered on the Site. The proposed residential floorspace therefore contributes towards LB of Hackney's housing targets and accords with the mixed-use requirements of the Site's PEA designation, in accordance with DMLP Policy 19 and Core Strategy Policy 17.

Residential Standards

Policy

- 6.36 London Plan Policy 3.8 states that Londoner's should have a genuine choice of homes that meet their requirements for different sizes and types of dwellings in the highest quality environment.
- 6.37 London Plan Policy 3.5 states that all new residential developments should meet dwelling space standards set out in Table 3.3 and have adequately sized rooms with convenient and efficient layouts. The minimum space standards are outlined below:

Dwelling Type	GIA (sqm)
1p flat	37
1b2p flat	50
2b3p flat	61
2b4p flat	70
3b4p flat	74
3b5p flat	86
3b6p flat	95

- 6.38 Additional requirements are set out within the Mayoral Housing SPG (2012) and London Housing Design Guide (2010), which provides further guidance on design standards for new residential development in London. All units have been designed to meet and exceed these standards, as demonstrated in the supporting Accommodation Schedule, prepared by SEW Architects.
- 6.39 At local level, Core Strategy Policy 19 seeks provision of new family accommodation (3 bed or larger) as well as seeking to provide a mix of housing to meet the identified needs of different types of households within the Borough and to create cohesive, tenure diverse communities.
- 6.40 Policy DM22 within the DMLP identifies the need for a higher percentage of 2-bed units over 1 bed (2 person) units, as they offer greater flexibility of accommodation, with 3 or more bedrooms constituting 33% of the overall mix, as outlined overleaf.

Tenure	1 Bed (2 Person)	2 Bed (3 or 4 Person)	3 or more Bed (5 person plus)
Market	Lower % than 2 beds	Higher % than 1 beds	33%

- 6.41 The DMLP advises that variations of this mix will be considered by the LBH but this will be dependent on the site location and characteristics, as well as the overall scheme viability.
- 6.42 Policy 3.8 of the London Plan states at least 10% of new housing should be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 6.43 Policy DM19 within the DMLP states that all new developments will be required to comply with accessibility standards, including 'Lifetime Homes,' with 10% of new housing designed to be wheelchair accessible.

Assessment

- 6.44 The Proposed Development seeks to provide 141 BTR units, comprising 26 (26%) studio units, 62 (62%) 1-bed units, 47 (47%) 2-bed units, 4 (2%) 3-bed units, and 2 (2%) 4-bed units. The residential mix is further broken down below:

	Studio	1 bed	2 bed	3 bed	4 bed	Total
No. of units	26	62	47	4	2	141
%	18%	44%	34%	2%	2%	100%

- 6.45 The proposed mix is therefore largely in accordance with the LBH's housing mix policy objectives. All units meet or exceed the space standards set out within the London Plan and Core Strategy, as set out in the accompanying Design and Access Statement, prepared by SEW Architects.
- 6.46 Although the percentage of family-sized units is below the percentage outlined in Policy DM22, it is considered that the proposed mix is appropriate in this instance. Whilst there is no specific identified residential mix within local planning policy or guidance with regards to the provision of BTR housing, Hackney's DMLP supports the provision of BTR homes and will work with the GLA and other delivery partners to seek to increase and improve the private rented sector in line with the London Plan and the Mayor's Housing SPG.
- 6.59 The GLA's Housing SPG (2016) states that development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local need and are appropriate to the location with recognition that the BTR sector has a significant role to play in accelerating overall housing delivery in London. Paragraph

3.3.11 of the SPG states specifically that: *“Local policies requiring a range of unit sizes could be applied flexibly to build to rent schemes in these locations to reflect demand and the distinct viability challenges faced by build to rent. Potential yields and investment risk can be affected by increases in the number of large units within a scheme.”*

- 6.60 38% of the proposed units comprise two or more bedrooms to reflect local demand and investment advice on the BTR model. This accords with regional and local planning policy, which advocates a flexible approach to residential unit mix through the delivery of high quality homes for private sector rent.
- 6.61 As such, it is considered that the Proposed Development provides an appropriate mix of units which meet or exceed minimum space standards. The scheme is therefore in accordance with the London Plan Policies 3.8 and 3.9 and Core Strategy Policy 19.
- 6.62 Furthermore, a total of 13 of the 141 units proposed have been designed to be easily adaptable to meet the needs of wheelchair users, distributed throughout the Proposed Development. In line with London Plan Policy 3.8, all units have been designed to Lifetime Homes Standards and are therefore in accordance with policy requirements. Further details are contained in the supporting Design and Access Statement.

Affordable Housing

Policy

- 6.63 Paragraph 62 within the NPPF states where LPAs have identified that affordable housing is needed, they ought to set policies for meeting this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.64 The London Plan (2015) Policy 3.12 identifies the need to *“encourage rather than restrain”* development and to *“promote mixed and balanced communities”* having regard to the need to the size and type of affordable housing needed and the specific circumstances of the site.
- 6.67 The GLA Housing SPG emphasises the importance of viability appraisals in assessing the ability of developments to deliver affordable housing including *“recognising that the requirements for contributions to schools, environmental improvements, transport or social infrastructure, may limit the number and mix of affordable homes”* (para 4.4.33). Draft London Plan Policy H6 sets a minimum requirement for 35% affordable housing, whilst at local level, Core Strategy Policy 20 seeks to meet a Borough-wide affordable housing target of 50% of all units subject to site characteristics, location and overall scheme viability.

6.65 Strategic Policy 20 within the Core Strategy sets out a hierarchical approach to affordable housing provision with the preference for on-site delivery. Where it can be demonstrated that on-site provision is not practical or viable, off-site provision within the vicinity and then elsewhere in the Borough will be considered. In circumstances where all of the cascade options have been thoroughly explored and proved impracticable or unfeasible, a payment in lieu will be applicable.

Assessment

6.66 As set out in the policies outlined above, the provision of affordable housing is governed by financial viability, taking into account the individual circumstances of the Site. An Affordable Housing Viability Assessment has been prepared by DS2 LLP, and is submitted under separate cover from the planning application. The assessment tests the maximum level of affordable housing and additional financial obligations, including s106 obligations and CIL, which can be supported by the development without impeding the viability of the project and the chances of delivery. The assessment will be reviewed by the Council and its independent assessors.

6.68 Therefore, the approach adopted in this case is wholly in accordance with planning policy as required by the London Plan and the Core Strategy, which emphasises the importance of delivering affordable housing and that “*negotiations on site should take account of their individual circumstances including development viability*” (London Plan Policy 3.12).

Residential Density

Policy

6.69 The London Plan states that development should optimise housing output for different types of location within the relevant density range set out within Table 3.2. Policy 22 within the Core Strategy states that development should optimise the use of land, corresponding to the distribution and density levels of housing to PTAL and the wider accessibility of the location.

6.70 Policy 3.4 within the London Plan advises as to overall density requirements stating that residential developments should optimise housing output, taking into account local context, character and other design principles within the Plan. Table 3.2 of the London Plan sets out the different density ranges within London based on both PTAL and the location of sites within either a suburban, urban or central locations. It's worth noting that the draft London Plan has removed the density matrix.

6.71 Hackney is generally a densely-populated borough which is recognised in DMLP Policy DM21 as facing significant housing challenges and an affordable homes shortfall of 593 dwellings per year until 2021. The policy also notes that, notwithstanding this shortage, new homes in the Borough must be designed to a high standard; taking account of design and sustainability standards and providing both amenity space and child play space.

Assessment

6.72 The Site is located in an area having a PTAL of between 2 and 4 however, as outlined in the supporting Transport Statement, the location of the Site is considered to be more representative of PTAL 4. The Site is also considered to be within an 'urban' setting. Table 3.2 indicates that such areas should achieve a density of 200-700 hr/ha. The Proposed Development has a density of 630 hr/ha, which is within the London Plan density guidelines. This density calculation is based on the proposed net residential area methodology, as required by paragraph 3.31 of the London Plan and paragraph 1.3.47 of the Mayor's Housing SPG. However, the guidance is not intended to be prescriptive and which serves as an indication only of the likely impact of development. The acceptability of higher density development is more appropriately assessed against its potential impact in environmental, townscape and infrastructural terms and where any such impacts arising are successfully mitigated by the Proposed Development, then high density development can be considered acceptable.

6.73 Core Strategy Policy 22 sets out the following criteria for assessing applications:

- Promoting high standards of residential quality, design and provides a balanced dwelling mix;
- Contributing to local place making and is suitable in its surrounding context;
- Assisting in the delivery of local housing targets;
- Benefiting from a good provision of surrounding transport links and physical access to services;
- Having adequate access to sunlight and daylight for proposed or neighbouring homes;
- Not impacting detrimentally on visual amenity, views or character of the surrounding area;
- Providing sufficient child play space, communal and private amenity space; and
- Not impacting detrimentally on local, social and physical infrastructure.

6.74 It is considered that the Proposed Development meets these criteria against which the LBH normally assesses density. The scheme proposes a residential density which optimises the use of the site in accordance with national, regional and local policy guidance, whilst creating a high quality sustainable mixed-use development. The Proposed Development seeks to provide a high-density scheme in an accessible location that responds to its setting. It makes efficient use of the site which enables the provision of a significant quantum of employment floorspace as well the provision of other beneficial and appropriate retail and residential uses.

6.75 The scheme has been rigorously tested to ensure that it does not result in any significantly adverse impacts with regards to townscape, environmental or infrastructural capacities. The results of this testing are set out within the supporting assessments within the planning application submission and elsewhere within this Statement.

Design, Heritage and Townscape

Architectural Assessment

Policy

6.76 Paragraph 124 and 127 within the NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, creates better places in which to live and work and helps make development acceptable to communities. Planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

6.77 The London Plan sets out a number of key policies relevant to the design of buildings:

- Policy 7.2 relates to an inclusive environment and states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments:
 - Can be used safely, easily and with dignity by all regardless of disability, age gender, ethnicity or economic circumstance;
 - Are convenient and welcoming with no disabled barriers, so everyone can use them independently without undue effort, separation or special treatment;
 - Are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways; and
 - Are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
- Policy 7.3 states that development should reduce criminal behaviour and contribute to a sense of security;
- Policy 7.4 encourages development to have regard to the form, function and structure of an area, and the scale mass and orientation of surrounding buildings; and
- Policy 7.5 seeks an improvement to public realm, encouraging the use of landscaping treatment, street furniture and way finding.

6.78 At local level, Policy DM1 of the DMLP states all developments must demonstrate compliance with the following criteria:

- Use high quality, durable materials;
- Incorporate sustainable design and resilient construction measures to ensure climate change has been incorporated;
- Be well laid-out internally, ensuring that proposals would not lead to cramped layouts, and allow for adequate circulation space, storage and installations such as furniture; and
- Conserve and enhance the Borough's heritage assets and settings.

Assessment

- 6.79 The Proposed Development provides an extremely high quality scheme which will significantly enhance the appearance of the Site and surrounding area. The proposals have been the result of a design-led process undertaken in accordance with the design principles set out in national, regional and local policy guidance. The Proposed Development has also been developed in response to the detailed feedback received from all interested stakeholders during the pre-application process, as to which, see the Design and Access Statement.
- 6.80 The Site occupies a brownfield site in a prominent canalside location and as such, the redevelopment opportunities that it presents have been optimised, whilst at the same time being carefully considered in the context of townscape and environmental considerations, including the Site's location within the Conservation Area and proximity to several statutory listed and locally listed buildings. The Proposed Development will improve the townscape of the Site and the surrounding area by replacing the existing buildings with well-designed, high quality new buildings that have been designed to respond appropriately taking into account the Site's location, capacity for development and the character of the surrounding area. This will principally be delivered through the proposed palette of high-quality materials which have been carefully selected by the project architect to ensure that the Proposed Development fits in well in urban design terms with its surrounding context.
- 6.81 In addition to the appearance of the buildings, the proposed scale has been designed to deliver significant urban design benefits and to contribute positively to the character and appearance of the surrounding area. The height of the proposed buildings varies across the Site to respond to the surrounding context, stepping down in height towards Eagle Wharf Road, before stepping-up towards the canal to create greater architectural interest and mark the siting of Sturt's Lock. In layout terms, buildings within the Site have been configured to deliver a number of urban design benefits whilst also ensuring the provision of a quality residential environment for future residents. The proposed layout will also enable a comprehensive package of public realm improvements to be delivered, including a pedestrian route through to the improved canalside via new pedestrian central yard. The general approach towards landscaping on the Site has been to enhance the setting of the Site and its contribution to the local area through the delivery of high quality and distinctive landscaped design. The proposed concept seeks to combine ecological principles with a high quality external environment, providing a strong sense of place. Further discussion of the design evolution process and the Proposed Development is set out in the Design and Access Statement.
- 6.82 The scheme has also been fully assessed as part of the Heritage Statement prepared by Alan Baxter Associates submitted as part of the Application. In particular, it is noted that this includes an assessment of the potential impact of the Proposed Development on the setting of the Regent's Canal Conservation Area, the locally listed buildings at No. 50 Eagle Wharf Road and Copley Street, and the Grade II-listed buildings in Arlington Square. This is discussed further in the next section below, however, it

should be noted that the proposed scheme has been carefully designed to ensure that the impact on the relevant designated and non-designated heritage assets is minimised.

- 6.83 In summary, the Proposed Development has been thoughtfully-designed and will represent a significant improvement on the appearance of the existing site. The scheme thereby accords with policies contained within the NPPF; London Plan Policies 7.27.6 and Policy DM1 within the DMLP.

Heritage and Townscape

Views Policy

- 6.84 The NPPF establishes national level policy on the conservation and preservation of the historic environment. Paragraph 189 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 192 further states that the desirability of new development should make a positive contribution to both local character and distinctiveness.
- 6.85 Paragraph 193 provides that when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets.
- 6.86 The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention...to the desirability of preserving or enhancing the character or appearance of that area'.
- 6.87 Paragraph 196 also states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.88 Finally, under paragraph 200 of the NPPF, when considering the impact of a Proposed Development on the significance of a designated heritage asset, LPAs should look for opportunities for new development in Conservation Areas and the setting of heritage assets to enhance or better reveal their significance and proposals that preserve or better reveal the significance of heritage assets should be treated favourably.
- 6.89 The London Plan promotes development of the highest architectural quality. Policy 7.6 sets out the Mayor's design guidance and requires developments to optimise the potential of sites and be designed in consideration of the local context including

potential impact on listed buildings and conservation areas, providing a development that enhances the public realm, uses a palette of materials that complements the local architectural character, is inclusive and is flexible to allow for different activities.

6.90 Policy DM28 of the DMLP states developments within the Borough's conservation areas shall preserve or enhance the character and appearance of the respective area. The LB of Hackney will only grant conservation area consent to demolish non-listed buildings where:

- the existing building is not considered to preserve or enhance the character and appearance of the conservation area; and/or
- where demolition is considered acceptable and there are satisfactory proposals for redevelopment of the site which must proceed after the demolition; or
- the proposed replacement building, other development or vacant site should preserve or enhance the character or appearance of the conservation area.

Assessment

6.91 A Townscape Visual Impact Assessment has been prepared by Peter Stewart Consultancy and Cityscape which includes 13 viewpoints to illustrate the effect of the Proposed Development on townscape and views. Overall, the views analysis demonstrates that the proposals will engage positively with its context, enhancing the quality of these views and acting as positive marker of Sturt's Lock. The report concludes that the Proposed Development would form a high quality and characterful piece of architecture, would be appropriately scaled, and would either enhance or have a neutral effect on the local and wider views and townscape in which it would be visible. It would create a welcoming environment that strengthens links to the canalside and encourages social interaction.

6.92 Furthermore, the supporting Heritage Statement, prepared by Alan Baxter Associates, concludes that the scheme will enhance the setting of the adjacent locally-listed lock and, by the use of thoughtful design and high-quality detailing, will enhance the Regent's Canal Conservation Area providing high density development on site with no negative impact to the adjacent locally listed structures at No. 50 Eagle Wharf Road or Copley Street. The height and high-quality architecture will emphasise Sturt's Lock as a focal point on the canal, achieving the many benefits of the development whilst remaining sensitive to the site's industrial and canalside heritage. The development will improve the existing site's relationship to the canal, reinstating its historical orientation, facing the canal, and reconnecting the site visually with the towpath, the waterside and the lock, consequently reconnecting the canal with Eagle Wharf Road.

6.93 The report does, however, acknowledge that the height of the tallest elements of the scheme will be visible from Arlington Square, and would detract from its setting by causing some minor disruption to the uniformity of the terraced houses to the south. However, it should be stressed that this results in less than substantial harm to a Conservation Area and Grade II listed terrace, and should therefore be carefully

balanced against the planning benefits of the scheme, as per paragraph 134 of the NPPF.

6.94 It is our view that the harm is outweighed by the following significant public benefits of the proposed development:

- Increased employment floorspace on-site providing a mix of flexible workspaces including hot desks, incubator and micro studies which are designed to encourage and meet the modern day working of the more creative industries;
- Increased provision of affordable work space on site to provide 8% of the total office accommodation, whilst rehousing the existing storage facilities on site;
- Provision of 141 BTR units which will contribute towards the Council's housing targets and accord with the mixed-use requirements of the site's PEA designation, in being auxiliary to the main employment function at the site;
- Improved public realm through the provision of a central landscaped area as public amenity space and a new pedestrian route through it to the canal side;
- Improved landscaping and tree planting that will enhance the appearance of the canal edge;
- New commercial uses that will enhance the vitality and viability of the area and contribute to animating the streetscene;
- Removing the existing building of poor architectural quality and providing a well pro-portioned development of high quality architecture;
- Enhancing the setting of locally listed Sturt's Lock, improving both access to and appreciation of this heritage asset; and
- Retaining existing features at the site, including the reinstatement of pitched roofs and historic break out spaces between the north and south blocks through the re-purposed 1939 Victorian wrought iron trusses to create the new canal side public courtyard.

6.95 In summary, the Proposed Development will have a beneficial effect on the townscape of surrounding areas and the views in which it is most prominent, together with enhancing the character and appearance of the Regents Canal Conservation Area and the neighbouring locally-listed buildings. Whilst it is considered that the proposals will result in less than substantial harm to the setting of the Arlington Square Conservation Area and Grade II-listed terrace, in our view the public benefits of the scheme far outweigh the harm, in line with paragraph 196 of the NPPF. For these reasons, the Proposed Development is considered to be in accordance with national and local policies and guidance in respect of design, heritage and conservation.

Residential Amenity*Air Quality**Policy*

- 6.96 Paragraph 170 within 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 soil, air, water or noise pollution or land instability.
- 6.97 Paragraph 181 further states that development proposals should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA).
- 6.98 The London Plan emphasises the need to achieve reductions in pollutant emissions and public exposure to pollution. In particular Policy 7.14 states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within AQMAs). Sustainable design and construction should be promoted to reduce emissions from demolition and construction and be at least 'air quality neutral,' by not leading to further deterioration of existing poor air quality.
- 6.99 At local level, Policy DM43 within the DMLP states that the LB of Hackney will encourage new development that does not lead to an increase in local air pollution and which promotes measures to improve air quality. Applicants will need to demonstrate how emissions from the construction process of the Proposed Development will be minimised and controlled, and the ongoing use of the Proposed Development will not contribute to a worsening of air quality. Or, how impacts on air quality will be minimised as far as is practicably possible.

Assessment

- 6.100 An Air Quality Assessment, prepared by SRL Technical Services, accompanies the Application. The report demonstrates that the impact of traffic emissions generated by the Proposed Development once operational will be negligible. Additionally, air quality for future residents and users of the Proposed Development has been considered and found to be suitable. The emissions from the energy generating plant proposed for the Site will comply with the thresholds set out in Supplementary Planning Guidance (SPG) issued by the Mayor of London and, therefore, plant emissions are unlikely to have a significant impact on local air quality. The air quality neutrality of the Proposed Development has been assessed, and has been found to be air quality neutral.
- 6.101 The Site is therefore considered to be air quality neutral and suitable for employment and other mixed uses, given that there is the potential to reduce exposure through controlled ventilation, in accordance with local Policy DM43 and London Plan Policy 7.14.

*Noise**Policy*

- 6.102 Paragraph 180 within the NPPF states that planning decisions should aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development.
- 6.103 Paragraph 170 states that development should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.104 At regional level, London Plan Policy 7.15 requires new noise sensitive development to be separated from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation; and promoting new technologies and improved practices to reduce noise at source.
- 6.105 At local level, Policy DM43 within the DMLP states development proposals should include measures to reduce adverse noise vibration, and/or odour impacts and minimise unnecessary light pollution, particularly to light and noise sensitive areas, the public realm and open space.

Assessment

- 6.106 The accompanying Noise Assessment, prepared by SRL Technical Services, was undertaken to establish the existing background noise climate and plant noise emissions criteria in line with the requirements of London Plan Policy 7.15 and Policy DM43 of the DMLP. The report recommends a number of measures to mitigate any potential noise impacts.
- 6.107 During operation, road traffic noise levels are not expected to significantly increase on Eagle Wharf Road. As such, the recommended glazing and ventilation specifications are considered capable of attenuating external noise break-in to within guideline criteria. The residential apartments will be shielded from the proposed self-storage facility, as the storage is at the basement levels. Therefore, the residents are not expected to be impacted by noise from the self-storage facility. Between the office and the residential units above, sound insulation will be carefully designed to mitigate against possible noise disturbance to residents. Additionally, the proposed plant will be located at ground and basement floor levels. Plant will be housed internally which will reduce noise emissions to atmosphere.
- 6.108 With regards to the noise generated from outdoor amenity spaces, including the proposed of terraces and gardens, it is expected to fall within the desired guidance levels.
- 6.109 The development can, therefore, be designed to achieve acceptable standards for future and residents, in accordance with national standards.

*Sunlight, Daylight and Overshadowing**Policy*

- 6.110 Paragraph 127 within the NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future users of places. Furthermore, national guidelines for daylight and sunlight issues are contained within BRE guidelines, regional and local policy refer to these guidelines as the accepted standard.
- 6.111 London Plan Policy 7.6 further states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential developments, in relation to privacy, overshadowing, wind and micro-climate. Policy 7.7 also notes that large buildings should not adversely affect their surroundings in terms of overshadowing and solar reflected glare, which can be mitigated through providing high quality internal spaces.
- 6.112 At local level, Policy DM1 within the DMLP states that proposals should provide and ensure adequate sunlight, daylight and open aspects to all parts of development and adjacent buildings, and ensure that schemes are not obtrusive in relation to adjacent buildings.

Assessment

- 6.113 A Daylight and Sunlight Assessment has been undertaken by EB7 which accompanies this Application. The report demonstrates that the overall effects of the development's impact upon the neighbouring properties is considered to be consistent with the intentions of the BRE guidance and relevant planning policy in terms of daylight and sunlight. The Proposal has been designed to be sensitive to its neighbours with regard to natural light by pulling away and stepping down in massing where necessary.
- 6.114 As would be expected for a scheme in a dense urban environment there will be some noticeable impacts to neighbouring residential properties. Generally, these windows have very high existing VSC values due to little obstruction caused by the existing building on the site, such that any development of a reasonable scale would result in a noticeable change, however the absolute VSC levels retained are common for an inner urban location. Furthermore, where there are deviations, the effects are isolated and remain in line with local consented scheme and the intentions of the BRE guidance.
- 6.115 The assessment of sunlight to neighbouring windows has also shown the vast majority of rooms retain sunlight levels in line with the BRE criteria. The assessment of sunlight amenity (overshadowing) within the neighbouring amenity spaces including Regent's Canal have shown full compliance with the BRE criteria.
- 6.116 The overall effects of the developments impact upon the neighbouring properties is therefore considered to be consistent with the intentions of the BRE guidance and relevant planning policy in terms of daylight and sunlight. As such, the Proposed

Development complies with Policies 7.6 of the London Plan and Policy DM1 within the DMLP in that it does not cause unacceptable harm to the amenity of the surrounding buildings.

Privacy and Overlooking

Policy

6.117 In addition to Paragraph 127 within the NPPF and London Plan Policy 7.6, Hackney Policy DM2 also notes that amenity considerations should be accorded with, specifically in relation to:

- Visual privacy and overlooking;
- Overshadowing and outlook;
- Sunlight and daylight, and artificial light, levels;
- Vibration, noise, fumes and odour, and other forms of pollution;
- Microclimate conditions;
- Safety of highway users.

Assessment

6.118 In accordance with London Plan and Local Plan policies, the proposed scheme has been designed to minimise proximity and overlooking to adjoining developments, acknowledging future developments on neighbouring sites, by maintaining adequate distances between existing and proposed habitable windows. Adequate distances will be maintained between the proposed scheme and the properties situated to the north of Regents Canal, ensuring there is no impact on the amenity of the neighbouring residential properties as a result of overlooking or loss of privacy.

6.119 Within the proposed scheme, the use of raised planters and boundary planting will provide additional privacy between the proposed private and communal amenity spaces, whilst the proposed layout will ensure that overlooking between the proposed units is minimised.

6.120 It is therefore considered that the scheme is acceptable in amenity terms.

Transport and Parking

Policy

6.121 At national level, the NPPF states that development should take opportunities to promote walking, cycling and public transport use (see Paragraph 102).

6.122 The London Plan promotes development that will not adversely affect safety on the transport network, setting out the following requirements:

- Policy 6.9 seeks secure cycle parking in line with the standards set out in Table 6.3 of the London Plan;

- Draft Policy T5 seeks secure cycle parking at least in accordance with the minimum standards set out in Table 10.2 of the draft London Plan;
- Policy 6.10 seeks high quality pedestrian environments; and
- Policy 6.13 states the maximum standards for car parking should be achieved as set out in Table 6.2 of the London Plan, and that 1 in 5 spaces should provide an electrical charging point.

6.123 At local level, Core Strategy Policy 6 states the LB of Hackney will support developments that reduce the need to travel, particularly by car, and will ensure that schemes result in the highest standard of design quality, environment and facilities for pedestrians and cyclists. This will be achieved by the following measures:

- Meeting the mobility requirements of all users, including those with sensory or mobility difficulties;
- Maximising accessibility for users of non-car modes;
- Mitigating any potentially negative impacts of new development on the transport network; and
- Reduced or preferably no on-site parking in areas of good accessibility.

6.124 Proposed Policy DM48 within the DMLP relates to parking provision and states that the LB of Hackney will expect to see car free and car capped development in the Borough, especially in areas with high PTAL ratings, closed to a range of amenities and are within a CPZ.

6.125 There are currently no car parking standards for the LB of Hackney and, as such, the standards in the London Plan, as described above, are being applied.

Assessment

6.126 A Transport Statement has been prepared by Alan Baxter Associates, which concludes that the transport and movement impacts of the development will be insignificant and that the development will provide improved Access Self Storage facilities that will improve the quality of the environment on Eagle Wharf Road.

6.127 Impact analysis of the scheme's anticipated non-vehicle trips demonstrates that the development would not have a significant impact on local pedestrian environment and public transport services.

6.128 As set out in the Transport Statement, the site is in an area of PTAL range 2 to 4, but within close proximity to public transport and local amenities. The Council requires new developments to be car free in areas of PTAL 4, or other well located areas. As a result, a car free development is proposed, except for disabled parking (6 spaces) and operational parking (7 spaces) to suit the requirements of the B8 storage use. Furthermore, the development is proposed to be under a permit-free agreement which will prevent new residents of Sturt's Yard parking on-street. 6 disabled parking spaces

(1 for office use, 5 for residential use) will be provided at ground floor level, in accordance with London Plan Policy 6.13.

6.129 In terms of cycle provision, the Proposed Development will include a total of 257 long stay and 44 short stay cycle parking spaces to serve the residential units, together with 105 spaces associated with the wider commercial and retail uses on the Site. In addition, 36 publicly accessible spaces will be provided (for both short stay and visitors).

6.130 In summary, the Site's excellent levels of accessibility to a wide range of public transport, along with the proposed provision of on-site cycle storage and parking facilities, will contribute to actively discouraging car ownership. The Transport Statement prepared by Alan Baxter Associates demonstrates that the Proposed Development is in accordance with national, regional and local planning policy.

Servicing Arrangements and Refuse Collection

Policy

6.131 Policy 5.16 of the London Plan seeks a reduction in waste and encourages the reuse and reduction in use of materials. The Core Strategy will ensure that local users reduce and manage their waste effectively, requiring all developments to reduce and reuse waste from construction and demolition, and to plan for waste storage and recycling facilities.

6.132 Policy DM1 within the DMLP states that all developments must include provision for the storage of waste. Space should be provided that is sufficient for equipment and containers to enable the processing and sorting of recyclable materials and other waste. Such storage facilities should be encased and screened from view from the street, visibly demarcated, and conveniently located for users and recycling collectors.

6.133 In relation to servicing and delivery arrangements, Policy DM46 within the DMLP states that these should be met within each development site and managed in such a way that minimises the adverse effects on highway/public realm users, and other residential or retail activity, stating materials and goods should:

- Be located with easy access to TfL's Road Network, the Strategic Road Network or other Major Roads;
- Accommodate goods vehicles within the curtilage of the site;
- Minimise disruption for local communities through effective management, including through optimisation of collection and delivery timings. Development proposals should be accompanied by a Construction and Logistics Plan (CLP) and Delivery and Servicing Plan;
- Ensure that all HGV and PCV operators involved in the construction and servicing of the development comply with the cyclist safety requirements set out in the TfL's Freight Operator Recognition Scheme.

Assessment

- 6.134 It is proposed that deliveries are to take place within the Site with service access provided from gated entrances to the proposed East Yard and West Yard.
- 6.135 The office/workspace units are unlikely to generate regular servicing trips by large delivery vehicles, with the main servicing requirements likely to be for office supplies and from cleaning/maintenance vehicles. The internal layout of both yards is large enough for a refuse vehicle to enter and exit the Site from Eagle Wharf Road. Additionally, the West Yard will be large enough to accommodate HGV deliveries serving the self-storage facility, and will benefit from four HGV parking spaces. It is envisaged that the café unit will be serviced from the East Yard, with the bin stores located within close proximity to the Yards to ensure refuse collection can take place easily and effectively.
- 6.136 Overall, the Transport Statement demonstrates that the Proposed Development has been designed to minimise the use of the private car and provide adequate levels of servicing, in line with DMLP Policies DM46 and DM1.

*Sustainability & Energy**Policy*

- 6.137 As noted previously, the NPPF establishes a presumption in favour of sustainable development. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to:
- comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and
 - take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.138 The London Plan seeks to secure sustainable development by:
- Requiring developments to demonstrate that sustainable design and construction standards have been integral to a proposal, including minimising carbon dioxide emissions, avoiding internal overheating, efficient use of natural resources, minimising pollution and waste, sustainable construction, and promoting biodiversity (Policy 5.3);
 - Requiring developments to minimise carbon dioxide emissions through the latest transitional arrangement targets which have increased from a 25% reduction (during 2010-2013) to a 40% reduction (from 2013 to 2016) on the 2010 Building Regulations (Policy 5.2); and
 - Requiring new development to evaluate the feasibility of Combined Heat and Power ("CHP") (Policy 5.9).

6.139 At local level, Policy DM39 within the DMLP states that major non-residential developments and mixed use schemes, with a site area of 1,000 sqm or more, must achieve a BREEAM rating of 'Excellent', and where possible, achieve the maximum number of water credits. In addition, new developments must incorporate exemplary standards of sustainable and inclusive urban design and architecture, and should reduce energy use and emissions that contribute to climate change during the life-cycle of the development, and ensure the reduction, reuse or recycling of resources and materials, including water, waste and aggregates.

Assessment

6.140 The application is supported by a BREEAM Sustainability Report and an Energy Statement, both prepared by Foreman Roberts.

6.141 The BREEAM Report states that, due to the nature of the self-storage areas being primarily warehouse like storage areas, the extent which some sustainability features could be incorporated is somewhat limited. Therefore, based on the current design assumptions, it is anticipated that this element of the scheme would achieve a score of 58.38%, a BREEAM Very Good rating. This is considered an appropriate score for this type of facility due to the relatively small scale of the applicable areas.

6.142 A BREEAM Excellent rating is however sought for the office areas, since it is felt that here there are greater opportunities to incorporate sustainability features and practices appropriate to the use of the building. The pre-assessment for these areas demonstrates that this is achievable, with a score of 70.03% achieved at this stage of the design, a BREEAM Excellent rating.

6.143 As detailed in the Energy Statement, the building and building envelope have been designed to reduce energy demand. The thermal performance of the building envelope has been maximised with a strong focus being placed on the optimisation of the glazed façade, use of balconies as shading, and the optimisation of U-values. In addition, energy use is efficient due to the incorporation of features in the building services systems.

6.144 The utilisation of this approach results in an improvement in the Building Regulations Part L (2013) Target Emission Rate of 5.2% at the Energy Efficiency Stage (be Lean) of the Energy Hierarchy.

6.145 Investigation has been made to the availability of existing or proposed district heat networks, with the result that although there is an existing network in the vicinity, it is over 300m away, therefore the feasibility of being able to connect to it is questionable. However, further discussions will be had with the operator, Vital Energy, and additionally, space will be allowed within the energy centre for heat exchangers should this, or any other local system become available to connect to at some point in the future.

- 6.146 To meet the challenge of providing affordable low-carbon heat energy a low carbon community heating scheme is proposed. This will be served from a single main energy centre utilising combined heat and power (CHP) as the lead heat source supplemented by gas-fired boilers, which will serve all residential blocks and provide the background heating to the self-storage areas.
- 6.147 The inclusion of this CHP operation results in the energy modelling demonstrating a 21.6% reduction in the Building Regulations Part L (2013) Target Emission Rate.
- 6.148 The feasibility of a range of renewable energy technologies has been reviewed for use in the scheme including wind turbines, biomass, ground-source, solar thermal and solar photovoltaic (PV). However, the nature of this urban development especially with regards to the compact and residential nature of the site, in addition to the high costs associated with them; preclude the use of many renewable energy technologies.
- 6.149 There is, however, roof area on the Eagle Wharf Road elevation with the potential to locate photovoltaic panels, therefore PV has been put forward as the most effective strategy. 82 panels could be located on this roof area, which would provide over 20kWp of power generation. These PV panels along with the air-source heat pump technology associated with the office VRF system have been incorporated in the Be Green stage of the energy hierarchy, and provide an additional 12.3% reduction in CO2 emissions, such that the overall reduction across the whole development is 31.2% over the Building Regulations 2013 baseline TER.
- 6.150 Due to the limitations described within the Energy Statement, the scheme is not able to meet the GLAs London Plan “zero carbon” requirement and falls just short of the 35% reduction in regulated emissions for non-domestic properties. Therefore, in line with Policy 5.2E, since full reduction cannot feasibly or viably be achieved on site, the remaining regulated carbon dioxide emissions will be off-set through a cash in lieu contribution to the borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.
- 6.151 As such, the Proposed Development fully complies with Policy 5.2 of the London Plan, Policies DM39 and DM41 within the DMLP and achieves the required reduction in carbon dioxide emissions. The Proposed Development also includes a range of sustainability initiatives which meet the requirements of Policy 5.3 of the London Plan.

Flooding and Drainage

Policy

- 6.152 London Plan Policy 5.12 states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.
- 6.153 London Plan Policy 5.13 requires development to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 6.154 Policy DM43 seeks that developments provide or contribute to strategic or site-specific infrastructure in line with the Council's CIL and/or Planning Contributions SPD to address and mitigate the impacts of flood risk, particularly when they are located in areas considered at high risk of surface water and fluvial flooding. All development should utilise Sustainable Drainage Systems (SuDS), unless there are practical reasons for not doing so, and manage surface water run-off as close to source as possible.

Assessment

- 6.155 The site lies within Flood Zone 1 which the EA defines as land having less than 1:1000 annual probability of river or sea flooding (<0.1%). Whilst it is understood that surface water flooding is not a significant risk to the site, the site is within an area of increased potential for elevated ground water.
- 6.156 As such, the application is supported by a Flood Risk Assessment and SUDs Strategy, prepared by Alan Baxter Associates. The report concludes that, based on published flood maps, no significant flood risks have been identified on the site. In order to mitigate the theoretical risk of surface water ingress into the proposed buildings on site, the report recommends threshold levels are raised above the level of Eagle Wharf Road and the external hardstanding areas on the development.
- 6.157 Additionally, a SuDS strategy incorporating a large area of green roof and volume of attenuation storage is proposed to reduce the surface water run off rate from the proposed development. Calculations set out in the accompanying report indicate that the proposed arrangement will reduce the surface water run-off from the site by around 90% compared to existing.
- 6.158 Although there will be a small increase in the foul discharge rate, this is more than offset by the significant reduction in surface water discharge from the site into the Thames Water combined sewer network, which will help to reduce any associated flood risks.
- 6.159 The proposed scheme is therefore in accordance with the NPPF, London Plan Policies 5.12 and 5.13, and Development Management Policy DM43.

*Ecology & Biodiversity**Policy*

- 6.160 London Plan Policy 7.19 requires developments to make a positive contribution to the protection, enhancement, creation and management of biodiversity. London Plan Policy 7.21 seeks that existing trees of value are retained and any loss as the result of development are replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.
- 6.161 Core Strategy Policy 27 states that the Council will protect, conserve and enhance nature conservation areas and develop a local habitat network contributing to the wider Green Grid. Development will be encouraged to include measures that contribute to the borough's natural environment and biodiversity. Where appropriate, a biodiversity survey of the site must be carried out, with actions to enhance the biodiversity value, mitigate or compensate for any harm to habitats and / or species.

Assessment

- 6.162 The Site comprises four warehouse buildings and is predominantly laid with hard standing and pavements. The quality of plant communities and habitats present is low. However, the Site is situated adjacent to the Regent's Canal, which is designated as a SINC and contains several trees on a small area of green space. As such, the application is supported by a Preliminary Ecological Assessment, prepared by PJC.
- 6.163 Through the implementation of the recommendations made in the supporting Preliminary Ecological Assessment, the Development will increase the species variety and coverage across the site through the creation of a range of new habitats and wildlife zones.
- 6.164 The new public realm, including soft landscaping proposed as part of the completed Development will provide numerous ecological benefits. Two Schwegler 1B bird boxes and one Schwegler 1SP sparrow terrace will be provided, and will be sited on mature trees or buildings at a minimum height of 2m, angled away from the prevailing wind and with unobstructed access to the box entrance. These boxes will enhance the site for house sparrows, which are considered a red list species (Birds of Conservation Concern). Additionally, two insect boxes (Schwegler Clay and Reed Insect Block or similar) will also be installed within the planted areas to increase available nesting opportunities for insects. The boxes will be installed close to vegetation in a sheltered location, where possible.
- 6.165 During construction care will be taken not to disturb or harm nesting birds, and other protected species, with measures secured by way of the CEMP.
- 6.166 Whilst the scheme will result in the removal of trees on the adjacent land, which is in the ownership of the Canal & River Trust, the proposed tree replacement scheme will

in fact increase the tree coverage across the site by over 5%, and increase the number of species in line with London Plan Policy 7.21.

- 6.167 In conclusion, the development will comply with relevant planning policies, specifically London Plan Policies 7.19 and 7.21, Core Strategy Policy 27 and DMLP Policy DM43, by incorporating measures to conserve and enhance the natural environment appropriate to the Development's location.

Impact on Regent's Canal

Policy

- 6.168 Given the Site's location adjacent to Regent's Canal, London Plan and Local Plan policies relating to the canal network are of relevance. London Plan Policy 7.30 states that development proposals along London's canal network should respect their local character and contribute to their accessibility.

- 6.169 Core Strategy Policy 28 states that the natural habitat and setting of the waterways and their riparian areas will be protected and enhanced. Where appropriate, public access, continuous green links, towpaths and heritage value along the waterfront should be maintained, improved and extended for the purposes of nature conservation, leisure, recreation, education and economic activity.

- 6.170 Development alongside the waterways and their riparian areas may be permitted where there is no conflict with nature conservation and biodiversity interest, that cannot be addressed through mitigation or compensatory measures, and the proposal reuses brownfield land, and the design makes a positive contribution to the character and appearance of the waterfront area and setting, including where appropriate the incorporation of an undeveloped buffer strip alongside the watercourse.

Assessment

- 6.171 At present, the Site does not provide access onto the canal from Eagle Wharf Road, and the existing buildings fail to engage with the canalside location. The proposed scheme will provide a direct pedestrian route through to the canal, whilst providing a series of enhancements to the public realm, significantly improving the character and appearance of Regent's Canal. The provision of a café fronting onto the canal will help improve the vitality of the area, whilst the wider scheme will mark a significant improvement on the existing site. Furthermore, as set out in the supporting Ecology Report, the canal and surrounding area will benefit from a series of biodiversity and ecology improvements.

- 6.172 To reiterate, the scheme will also enhance the setting of the adjacent locally-listed lock and, by the use of thoughtful design and high quality detailing, will enhance the Regent's Canal Conservation Area providing high density development on site with no negative impact to the adjacent locally listed structures at No. 50 Eagle Wharf Road or Copley Street.

6.173 The scale and massing of the proposed development is informed by site constraints and site opportunities with the siting at Sturt's Lock, and will not result in an unacceptable level of overshadowing along the canal, in line with BRE guidance and relevant planning policy in terms of daylight and sunlight.

6.174 It is therefore considered that the proposed scheme will make a positive contribution to the area, in accordance with London Plan Policy 7.30 and Core Strategy Policy 28.

Archaeology

Policy

6.175 London Plan Policy 7.8 states that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

6.176 Locally, Policy DM28 states that developments must not adversely affect important archaeological remains or their settings. Archaeological assessments may be required for other development proposals where it is considered important archaeological remains may be present. There is a presumption in favour of physical preservation in situ of important archaeological remains. Mitigating measures must be taken to ensure the preservation of all remains of archaeological importance, either in situ preservation or a programme of excavation, recording, publication and archiving of remains.

Assessment

6.177 An Archaeological Desk-based Assessment of the Site has been undertaken by CgMs. The report confirms that the Site does not lie within the vicinity of a World Heritage Site, Scheduled Monument, Historic Battlefield or Historic Wreck, or within an Archaeological Priority Area as defined by the local planning authority. The site can be considered likely to have a generally low archaeological potential for all past periods of human activity. Past post depositional impacts are considered likely to have been severe as a result of several phases of redevelopment. The report concludes that, in view of the available information, no further archaeological mitigation measures are considered necessary in this particular instance.

6.178 The Proposed Development, in the context of archaeology, therefore complies with the NPPF, London Plan Policy 7.8 and DMLP Policy DM28.

*Contamination**Policy*

- 6.179 The NPPF encourages development which prevents unacceptable risks from pollution and land instability. Of relevance to the Site, paragraph 180 of the NPPF seeks to ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
- 6.180 At local level, Policy DM41 of the DMLP states that the LB of Hackney will refuse the grant of planning permission unless an applicant can demonstrate that sufficient and economic decontamination can be achieved, and where the appropriate level of desk study information has been submitted. This will need to include an appropriate level of historical and environmental information for the site and surrounding area, development of a conceptual model, a risk assessment, proposals for site investigation and, where necessary, details of remedial options and measures.

Assessment

- 6.182 A supporting Geo-Environmental Site Assessment has therefore been undertaken by RSK which indicates that relevant pollutant linkages are absent and therefore the site is suitable for the proposed uses.
- 6.183 Based on the findings of the desk study, a generally low level of soil/groundwater contamination risk is considered to exist at the Site and therefore no further mitigation measures are required, in accordance with Policy DM42 within the DMLP.

7. DRAFT SECTION 106 HEADS OF TERMS

7.1 This section sets out a summary of the draft Heads of Terms for the Development, and identifies where financial contributions could be made and where works 'in kind' are proposed in lieu of payment. The draft Heads of Terms have been considered in relation to Hackney's Section 106 Planning Obligations SPD (2015).

7.2 It is envisaged that discussions relating to the following draft heads of terms and the Section 106 Agreement will continue with LBH during the determination of the planning application.

- **Highways improvement works** – in-kind provision (as per paragraphs 3.23 - 3.24);
- **Affordable Housing** – Affordable housing provision will be discussed further with the Council. The application is supported by a Financial Viability Assessment.
- **Affordable workspace** – in-kind provision (8% of total employment floorspace);
- **Car free development (restriction on permits)** – in-kind provision;
- **Carbon offset payment** – financial contribution;
- **Employment and training contribution** – financial contribution;
- **Employment and skills plan** – in-kind provision;
- **BTR management plan** – in-kind provision;
- **Travel Plan** – in-kind provision;
- **Travel plan monitoring fee** – financial contribution;
- **Tree placement works** – in-kind provision (as per paragraph 3.14);
- **S106 monitoring fee** – financial contribution.

8. CONCLUSION

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.2 This Statement assesses the Development against the Development Plan and other relevant national, regional and local planning policy, including the aspirations and targets for the City Fringe / Tech City Opportunity Area.
- 8.3 The principle of the Development accords with adopted and emerging planning policy and guidance. National policy, the London Plan, the Core Strategy and the City Fringe / Tech City OAPF all seek to ensure that development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land.
- 8.4 The Development will deliver an employment-led mixed use development with a sustainable mix of uses that complement and enhance the area's existing offer, contributing to regional and local planning targets for jobs and homes; delivering public realm improvements and exemplary design; whilst maximising the development potential of this brownfield site.
- 8.5 The proposals play an important role in delivering the aspirations of the Council for the Priority Employment Area and the City Fringe Opportunity Area by delivering a significant quantum of new flexible office floorspace, a substantial number of Private Rented Sector residential units, and a café, whilst retaining the Site's existing primary use as a self-storage facility (Class B8).
- 8.6 The proposals have been subject to a comprehensive consultation exercise involving regular pre-application meetings officers from the Council, and key consultees such as the GLA, and local residents and amenity groups. The issues raised by these groups have been considered and incorporated in the development of the final proposals, where practicable.
- 8.7 The Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in general accordance with the Development Plan and other material considerations.
- 8.8 In particular, it will deliver the following policy objectives and public benefits:
- Increased employment offer on-site providing a mix of flexible workspaces including hot desks, incubator and micro studies which are designed to encourage and meet the modern day working of the more creative industries;
 - Increased provision of affordable work space on site to provide 8% of the total office accommodation offer, whilst re-housing the existing storage facilities on site;

- Provision of 141 residential units which will contribute towards the Council's housing targets and accord with the mixed-use requirements of the site's PEA designation, in being auxiliary to the main employment function at the site;
- Improved public realm through the provision of a central landscaped area as public amenity space and a new pedestrian route through it to the canal side;
- Improved landscaping and tree planting that will enhance the appearance of the canal edge;
- New commercial uses that will enhance the vitality and viability of the area and contribute to animating the streetscene;
- Removing the existing building of poor architectural quality and providing a well pro-portioned development of high quality architecture;
- Enhancing the setting of locally listed Sturt's Lock, improving both access to and appreciation of this heritage asset; and
- Retaining existing features at the site, including the reinstatement of pitched roofs and historic break out spaces between the north and south blocks through the re-purposed 1939 Victorian wrought iron trusses to create the new canal side public courtyard.

8.9 Overall, the Development would deliver an exemplary development which would have many regenerative and economic benefits for the Site and immediately surrounding area in line with NPPF, London Plan and the Council's planning objectives.

8.10 For the reasons outlined above, the principle of the Development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth.

8.11 The proposed Development is acceptable and, therefore, should be granted planning permission.

APPENDIX 1 - RETAIL IMPACT ASSESSMENT

STURT'S YARD – RETAIL ASSESSMENT

This Retail Assessment appendix has been prepared to satisfy LB Hackney's Development Management Local Plan Policy DM7 (*'New Retail Development'*). Policy DM7 requires that proposals for new Out of Centre retail floorspace (Class A1 – A5) *"in excess of 200 sq.m gross will be required to submit a sequential test and an impact assessment demonstrating that there will be no adverse impact on the vitality and viability of ... town centres"*. The proposed redevelopment of Sturt's Lock, whilst primarily delivering residential accommodation (141 units) and office floorspace (4,600 sq.m GIA), also includes a small café (219 sq.m GIA) on this Out of Centre site. As such, there is a requirement to submit a sequential test and impact assessment.

Although only a small component of the overall floorspace being proposed, the retail element of the proposed development is an integral part of the wider development which is forecast to principally serve and support the significant uplift in population deriving from the proposed scheme's future residents and office workers.

By way of context, the site is located circa 1.2km west of Hoxton Street (a designated Local Shopping Centre ('LSC')), the closest defined centre to the site. On the basis that other centres in LB Hackney's retail centres hierarchy are further afield, Hoxton Street LSC is the only centre which is in close enough proximity to need to be considered as part of this retail assessment. This Appendix now demonstrates the appropriateness of the proposals in line with the requirements of DM7, namely the need to satisfy the sequential and impact tests.

Sequential Test

Paragraph 86 of the National Planning Policy framework ('NPPF'), like Policy DM7, requires proposals for new retail development in Out of Centre locations to undertake a sequential approach to site selection. This states that in applying the sequential approach, retail uses should first be located within Town Centre locations (Hoxton Street LSC in this instance) and then in Edge of Centre locations that are well connected to the Centre and then in Out of Centre locations.

As stated, the proposed café is an integral component of the Sturt's Lock proposals and as it will only come forward as part of the wider development, we do not consider it necessary to consider the potential to accommodate this floorspace as a separate entity in nearby Centres (Hoxton Street LSC). National Planning Practice Guidance ('NPPG') states that *"the application of the [sequential] test should be proportionate and appropriate given the proposal"* (Paragraph: 010 Reference ID: 2b-010-20140306), recognising that some proposed uses will have *"particular market and locational requirements which mean that they may only be accommodated in specific locations"* (Paragraph: 011 Reference ID: 2b-011-20140306). As such, the proposals are considered to satisfy the requirements of paragraph 86 of the NPPF and Policy DM7.

Retail Impact Test

The NPPF impact test (paragraph 89) and Policy DM7 require proposed retail floorspace to be assessed with regard to the impact on existing, committed and planned public and private investment and the impact of the proposal on Town Centres vitality and viability (in this instance on Hoxton Street LSC). Whilst the NPPF establishes a 2,500 sq.m gross threshold, below which an impact assessment is not required, there is provision for local authorities to set their own, lower threshold. Policy DM7 identifies a 200 sq.m gross threshold and on this basis an assessment of retail impact on Hoxton Street LSC is required, and is included within this Appendix.

Importantly, NPPG is clear that *“the impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible”* (Paragraph: 015, Reference ID: 2b-015-20140306). As such, it is considered that a proportionate approach should be taken, appropriate to the location; the wider development being proposed; the retail context; and the restricted Class A3 café proposed.

The café floorspace proposed is designed to primarily serve future residents and office workers associated with the wider proposals. We estimate that new residents will generate an additional circa £0.51m¹ of expenditure per annum with office works generating in the region of £0.55m² of additional expenditure (a total of approximately £1.06m). We have estimated that the proposed café unit will generate a turnover of approximately £1.12m³ per annum, meaning that it is therefore reasonable to assume that only a very small level of trade (circa £0.06m) could be drawn from elsewhere. Even if this were to be drawn entirely from Hoxton Street LSC, representing a ‘worst-case’ scenario, this would equate to an impact of less than 0.5%⁴.

Considering the health of Hoxton Street LSC and its ability to withstand what is only a negligible level of impact, healthcheck surveys of Hoxton Street LSC (both LB Hackney evidence base work or our own) find it to be both vital and viable, performing well against key ‘health check’ indicators, including high levels of footfall, limited vacancies and a good range of retail and service operators.

The above assessment utilises consistent London Borough / Experian data sources and an estimate for Hoxton Street LSC (given the lack of available data) and is considered robust and proportionate, and if anything overstates any potential impact given the significant growth in available retail spend over recent years, a trend that is expected to continue over the plan period. It is concluded that given the negligible level of trade diversion, the proposals would not result in significantly adverse impacts on Hoxton Street LSC. In addition, and as part of this assessment, we can conclude that the proposed café (as part of the wider Sturt’s Lock development) will not prejudice existing, committed or planning

¹ Based on a conservative estimate of 300 people (141 units), with per capita expenditure on food and beverage retailing of £1,700.

² Based on there being 322 new office workers, derived from an office area of 3,538 sq.m NIA and an employment density of 11 sq.m NIA per worker.

³ Based on the 216 sq.m GIA unit and a trading density of £5,200 per sq.m.

⁴ Based on a total turnover for Hoxton Street LSC of approximately £15m.

public and/or private investment. On this basis, the Proposed Development complies with NPPF paragraph 89 and Policy DM7.

Summary

The proposed café unit is an important and integrated part of the proposals, which are intended to meet a locationally specific need/demand. It is not considered appropriate or reasonable to accommodate this floorspace as a separate entity in nearby Centres and as such there are no sequentially preferable / suitable sites or units available within Hoxton Street LSC.

Based on the identified local need associated with the wider development and the expenditure available from the increased residential and office populations, the proposals will not have any significant impact on the vitality and viability of Hoxton Street LSC and by extension other centres further afield. Furthermore, Hoxton Street LSC is evidently performing strongly and is considered to be a healthy centre. There is no planned or committed investment in Hoxton Street LSC which could or would be affected by the proposals.

On this basis, compliance with the sequential and retail impact tests as outlined in Policy DM7 and the NPPF has been demonstrated.

APPENDIX 2 - DRAFT AFFORDABLE WORKSPACE STATEMENT

Access Self Storage Affordable Workspace Statement September 2018

Capacity

- 371.6m² of B1 space will be offered as Affordable Workspace. This equates to 3% of the total employment space.
- The employment area is predominantly made up of self-storage space (7,420 m²), with offices (4,599 m²) and a café (219 m²).
- The affordable workspace equates to 8.08% of the total office floor space provision.
- If we assume that an individual occupier requires 12m² of B1 space, then we would house 30 individuals on site within the affordable workspace.

Design Specification of the Proposed Workspace

The proposed affordable workspace is designated solely to B1 use. The space has been designed to appeal to a multitude of different types of start-up businesses and SMEs. The space will be principally used as offices but will be flexible to occupier's requirements.

Initially, there is one type of design specification and this is summarised below:

- Climate controlled office space
- Minimum floor to ceiling heights of 2.7m
- Fast Broadband Connections
- Private phone systems available (at an extra cost)
- Shared kitchen and toilet facilities
- Extended/Flexible hours of access
- Secure entry phone system
- Secure cycle parking
- Storage packages available (subject to extra costs)
- Full access to the onsite amenities and cafe
- All-inclusive bills package available

Target Occupiers

The space will be very much designed to provide a friendly and hospitable environment for people wishing to reside on their own or mix/co work with other like-minded individuals and companies. It has been designed with flexibility and adaptability in mind to make sure it can be tailored to occupational needs and appeal to a multitude of different and diverse businesses.

We suggest initially that lettings should be on a location basis, occupants living in the London Borough of Hackney will have priority. Once the entire space is fully let, any future space that becomes available will always be offered on this basis, namely to the local borough's residents first. If space remains unoccupied after a preliminary 3 month period, then it can be offered to those living in other London Boroughs who may have a need for this type of accommodation.

Occupants will have to join the affordable workspace as an associate member and will be placed on a waiting list should the space be oversubscribed.

We have ambitions for the space to appeal to:

- SME and start up tenants whose businesses work with local communities and commerce.
- Service providers who cannot afford Mid-Town, City and City Fringe rents, rates and outgoings
- Niche business who seek adaptable and flexible office accommodation
- New or recently formed occupiers who seek small offices, studios or workspace which provide short or longer terms lease agreements
- Rehouse, where possible, occupiers of the current storage and office facilities
- Sectors in occupation close by include Media, Life Sciences, Technology, Medical Services, Construction, Hospitality and these could provide platforms for occupiers trying to break into these industries or provide local support services.

Management and Lease Arrangements

- Access Self Storage will be the registered Affordable Work Space Provider.
- The management of this site will be housed on site with head office support.
- Dedicated help services and facilities supports will be available via the in-house management team.
- Permitted hours will be from 7am to 7pm
- Principal rent will be assessed at a discount of 20% to open market value. Based upon the JLL valuation, documented within our viability assessment, the market rent is £42.50psf for B1 office space. Unit 5 will be offered at rents in the region of £34psf. Inclusive and exclusive terms can be negotiated.
- Leases/Licences will be offered on initial 3-month terms with one months' written notice required by the occupiers should they wish to terminate the arrangement.

- Longer term contracts will be available (6 months plus) if required, with break notices extended to at least 3 months written notice being required.

- Space will be subject to rent reviews if occupied for more than a 3 year period. These will be RPI linked unless agreed otherwise.
- Any leases will be held outside of the security of tenure provisions denoted in the Landlord and Tenant Act 1954