

32-42 Bethnal Green Road, Shoreditch

in the London Borough of Tower Hamlets

planning application no. 07/02193

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

The proposal

Clearance of site and erection of part 4 to 25 storey mixed use buildings to provide 3,660 sq.m. of new commercial floorspace falling within use classes A1, A2, A3, A4, B1, B8, D1 and/or D2 together with 372 new homes including affordable provision and car parking, bicycle parking, refuse/recycling facilities and access together with public amenity space and a new public square.

The applicant

The applicant is a joint venture between **Telford Homes** and **Genesis Housing Group**, and the architect is **Stock Woolstencroft**.

Strategic issues

The application contains an appropriate mix of uses for this City Fringe **Opportunity Area** location, maximising its potential compatible with local context and broadly in accordance with London Plan **design** principles. There are a number of detailed design issues, particularly due to exposure to high **noise** levels, which need further attention. In the absence of an appraisal it is not possible to conclude that the scheme achieves the maximum reasonable amount of **affordable housing** in line with the London Plan. Further work is required to adequately address existing and emerging London Plan **energy** policies in respect of decentralised energy, renewable energy and energy efficiency. There are a number of outstanding **transport** issues that need to be addressed

Recommendation

That Tower Hamlets Council be advised that the application is supported in principle subject to the outstanding strategic issues raised being addressed satisfactorily.

Context

1 On 13 September Tower Hamlets Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under Category 1C (c) of the Schedule of the Order 2000: *“The building is more than 30 metres high and outside the City of London.”*

3 If Tower Hamlets Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London’s comments on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site area is 0.6 hectares and consists of an irregular shaped parcel of land located on Bethnal Green Road. The site also has frontage to Sclater Street, Cygnet Street and Bacon Street. The site is currently occupied by a single, single storey commercial building, split into different units.

7 The existing commercial building is in B8 warehouse and distribution use, although the majority of the building is vacant. It is divided into approximately six units, which have a combined floorspace of 3,393 sq.m.

8 A limited number of listed buildings are located close by and the site adjoins a conservation area to the east and the south, with a further conservation area slightly further away to the north.

9 To the south of the site lies Bishopsgate Goods Yard, a 4.6 hectare site which will provide a new mixed use quarter to include retail, residential and office accommodation. This proposal is a joint venture by Ballymore Properties and Hammerson.

10 In 2010, the new Shoreditch underground station will open just to the west of the site. The entrance to the station will be located on the reopened Wheler Street, just off Bethnal Green Road. The site is bounded by Bethnal Green Road to the north, Sclater Street and Bacon Street to the south and Cygnet Street and Brick Lane to the east.

11 The site is located approximately 200m east from the nearest Transport for London Road Network, the A10 Shoreditch High Street. There are currently three vehicular accesses to the site via Sclater Street, and a further three via Bacon and Cygnet Streets. The site has a public transport accessibility level (PTAL) of 4 where 1 is poor and 6 is excellent. Two bus services operate along Bethnal Green Road, a further seven services operate along Shoreditch High Street. Liverpool Street station is within 12 minutes walk of the site and is serviced by the central, metropolitan, circle and hammersmith & city lines. Liverpool Street station also offers National Rail services.

Details of the proposal

12 This is a mixed use development comprising:

- 3,660 sq.m. of B1 office commercial space.
- 5,305.5 sq.m. of affordable housing for rent (75 apartments).
- 1,967.5 sq.m. of shared ownership (29 apartments).

- 14,801 sq.m. of private residential accommodation (268 apartments).

13 The application breaks down into three separate elements. Block A occupies the western part of the site, Block B the eastern part and a new public square is proposed between them.

14 Block A would occupy the western part of the site, between the new square and the new Shoreditch Station. A series of commercial units are proposed at ground floor, with residential above, which would be market sale and shared ownership tenures. A stand-alone five storey commercial block is proposed at the very western end of the site, with a glazed space linking this to the remainder of the building. The block would wrap around and create an internal courtyard area.

15 The basement provides car parking, cycle parking, commercial floorspace and plant space. Vehicle access is from Cygnet Street. The block varies in height from 25 storeys at the western end, to 4 storey facing onto Sclater Street. The highest point would be 73.5 metres.

16 Block B occupies the eastern part of the site and is smaller in scale, reflecting the proximity to the conservation area covering Brick Lane. On Bethnal Green Road commercial units face the new square with residential above with family houses located on Bacon Street. These units are for social rent housing. In the middle of the block, communal amenity space is provided, including children's play space.

17 This block would also have a basement, including car parking, cycle parking, commercial units and plant space. In terms of height, the scale would vary from 5 storeys at the eastern end, reflecting the height of existing buildings on Brick Lane and Bethnal Green Road, to 8 storeys facing onto the new square.

18 83 car parking spaces are proposed. This breaks down into 8 blue badge holder, 70 spaces for the family units (3, 4 and 5 beds) and some remaining spaces for car club spaces and for the operational requirements of the commercial units. 470 cycle parking spaces are proposed.

19 The scheme proposes 3,660 sq.m. of commercial floorspace on site, which represents 108% re-provision of existing floorspace. At present the end users have not been identified, so to ensure maximum flexibility and ensure the units are let and do not remain vacant, a range of uses have been applied for. Possible end users could include shops, office space, light industrial or studio uses, nursery/creche or community facilities.

Case history

20 None relevant.

Strategic planning issues and relevant policies and guidance

21 The relevant issues and corresponding policies are as follows:

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|------------------------|---|
| • Economic development | <i>London Plan; the Mayor's Economic Development Strategy</i> |
| • Housing | <i>London Plan; PPS3; Housing SPG; draft Providing for Children and Young People's Play and Informal Recreation SPG; the Mayor's Housing Strategy</i> |
| • Affordable housing | <i>London Plan; PPS3; Housing SPG; the Mayor's Housing Strategy</i> |
| • Density | <i>London Plan; PPS3; Housing SPG</i> |
| • Urban design | <i>London Plan; PPS1</i> |
| • Regeneration | <i>London Plan; the Mayor's Economic Development Strategy</i> |

- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Employment *London Plan; PPG4; draft Industrial Capacity SPG*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; draft Planning for Equality and Diversity in Meeting the spatial needs of London's diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*
- Tall buildings/views *London Plan; RPG3A, draft View Management Framework SPG*
- Sustainable development *London Plan; PPS1, PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- River Thames/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*
- Historic Environment *London Plan; PPG15*

22 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 1998 Tower Hamlets Unitary Development Plan and the 2004 London Plan (with 2006 Alterations).

23 The following are also relevant material considerations:

- The Further Alterations to the London Plan, which have undergone public consultation.
- The Council is working on its Local Development Framework (LDF) and submitted various documents to the Secretary of State in November 2006 including the Core Strategy, the Proposals Map and the City Fringe Area Action Plan (AAP) in November 2006. However, the Council has withdrawn the submission documents and no EiP date has been set.

Regeneration and mix of uses

24 The site is not located within a Strategic Employment Location. Nor is the site covered by any local designations in the adopted UDP. The emerging LDF shows the site marked as a development site (CF2b). The application site does fall within the 'other industrial sites' category in the Mayor's draft Industrial Capacity Supplementary Planning Guidance (2003). Whilst its release does not raise any strategic concerns the council should satisfy itself that this land is surplus to both current and future demand in accordance with policy 3B.5 of the London Plan, the Mayor's draft 'Industrial Capacity' SPG and the relevant remaining policies contained within the Tower Hamlets Unitary Development Plan (i.e. those policies saved following the Secretary of State's recent direction).

25 The application site is located within the emerging Opportunity Area for City Fringe, which has been identified on the basis that it is capable of maximising residential and non-residential densities and should contain a mix of uses. The arc from Shoreditch around the eastern fringes of the City contain relatively central sites with significant development potential, particularly due to proximity to the extended East London line.

26 The Eastern City fringe contains some of London's most deprived inner city communities as well as affluent new quarters and London's largest Bangladeshi neighbourhood. Other sites close by hold the potential to support London's financial and business services to underpin the area's economic activity. This application site is more appropriate for the mix of uses proposed to serve the local community through new homes and affordable business space. The proposed housing

also seems likely to support existing businesses along Bethnal Green Road, including the Rich Mix Centre which lies immediately adjacent.

Housing

27 The residential provision is as follows:

	Studio	1-bed	2-bed	3-bed	4-bed	5-bed	Total	<i>London Plan</i>
Social rent	0	20	23	20	7	5	20%	35%
Shared ownership	0	8	8	14	0	0	8%	15%
Market	32	112	91	32	0	0	72%	50%
Total	32	140	122	66	7	5	100%	100%

28 In terms of affordable provision, this equals 35% (measured by habitable room), split approximately 73:27 between social rented and shared ownership. Family provision is 15% in the private/shared ownership element, while the social rented element provides 43% family units, including extra large 5-bed units.

29 One of the Mayor’s strategic objectives is to increase substantially London’s supply of affordable housing and the London Plan sets out an overall strategic target that 50% of new housing provision (supply from all sources) should be affordable housing. The Mayor’s stated position in the London Plan is that in considering individual development proposals borough councils should seek the maximum reasonable amount of affordable housing, taking into account individual site costs, the availability of public subsidy and other scheme requirements (Policy 3A.8).

30 The proposed level of affordable housing falls short of the Mayor’s 50% target. In order to assess the appropriate level of affordable housing, the applicant should submit a full financial viability assessment of the proposal, which evaluates a range of variables, in addition to the availability of public subsidy. Other factors include the individual site costs, economic viability, and the cumulative package of S106 benefits. This assessment is required before the application is referred back to the Mayor for a decision.

31 The proposed mix, including the broad tenure split is welcomed, as is the provision of 5-bedroom units. The applicant indicates that of the total of 35% affordable housing, 25% will be delivered without public subsidy, with the remaining 10% being delivered with the support of Housing Corporation grant funding (2008-2011 funding round). A full financial appraisal is required to justify the proposed level of affordable housing, to ensure that grant is used effectively and to ensure that the maximum affordable housing output from this development is achieved.

Urban design and tall buildings

32 The London Plan calls for the highest quality design for large-scale buildings (policy 4B.9). Prominent developments should be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape elements.

Tall buildings

33 Policies 4B.8 and 9 of the London Plan deal with tall buildings and their location and the design of large scale buildings. The Mayor promotes in policy 4B.8 tall buildings where they will create attractive landmarks and enhance London's character and where they act as a catalyst for regeneration. This does not necessarily imply that high residential density can only be achieved through high rise buildings and the London plan acknowledges that poorly designed tower blocks in the past have not necessarily delivered either high density or usable spaces. Nonetheless tall buildings can be a very efficient way of using land and can make a significant contribution to creating an exemplary and sustainable world city.

34 The application proposes a tall building rising to 25 storeys in the western block. The application site sits within the emerging Opportunity Area Framework for the City Fringe. The emerging framework identifies this and adjoining sites as a suitable location for tall and large buildings. Seen in this wider context, which includes an emerging cluster of tall buildings increasing in height towards the city, this site is considered to be a suitable location. The designs show that care has been taken in relation to the surrounding residential environment, including privacy, amenity and overshadowing. In particular, lower buildings have been located to the south of the site and the plan has a mix of single and dual aspect dwellings.

35 The design response has been derived from a rigorous urban design assessment and has evolved through a number of iterations to take account of microclimate, adjoining conservation areas and other constraints. In particular, the massing and orientation result in a striking and contemporary form rising at the apex of the intersection between Wheler Street and Bethnal Green Road looking east. This produces an appropriate landmark looking east from the new Shoreditch station. The proposed form of the tall building is therefore an appropriate design response to the site's context creating an attractive landmark building which will add positively to London's skyline. It will also contribute to the maximisation of the site's potential and the creation of good quality public realm.

36 Within the context of broad support for this design response it is vital that high quality design is carried through to detailed design. Policy 4B.9 requires tall buildings to be attractive landmarks from all angles. The materials and cladding systems used will be crucial in this respect. However, the aluminium cladding panels proposed for the Bethnal Green Road elevation don't appear entirely convincing and the applicant should provide further details to justify their approach. It is recommended that details of materials are secured by planning condition.

37 A small number of the corner residential units within the tall building appear cramped, overlooked by adjoining balconies and lacking in daylight. The layout of these units should be reconsidered. Similarly, a small number of flats on the lower levels of block B are single aspect facing Bethnal Green Road where traffic levels are high and the noise report indicates the site just falls into PPG24 Noise Exposure Category (NEC) D at night (see also noise comments). The layout of these units should be reconsidered.

38 Policy 4B.3 of the London Plan seeks to maximise redevelopment potential by achieving the highest possible intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. Policy 4B.3 continues to explain how the Mayor will refuse planning permission for strategic referrals that, taking into account context and potential transport capacity, under-use the potential of the site. Based on the above assessment, the proposal accords with these policies.

39 The wider proposals for the public realm, to include 1,040 sq.m. of new public space, are convincing. It will re-establish a connection towards the rich mix centre which existed historically. The Club Row covered space provides an enclosed pedestrian route integrated with the commercial

units that will be a destination in itself. Other street improvements are proposed along Bethnal Green Road and Sclater Street and are welcomed. All frontages are animated by active uses and seem likely to add positively to street scene.

Children’s play space

40 London Plan Policy 3A.15 provides a policy context for social infrastructure, including children’s play space. The Mayor’s draft supplementary planning guidance: ‘Providing for Children and Young People’s Play and Informal Recreation’ provides further guidance. Draft further alteration to the London Plan Policy 3A.15i also seeks the provision of a play space strategy. Paragraph 4.42 of the draft SPG states that a benchmark standard of 10 sq.m. per child should be applied to establish the quantitative requirements for play space provision arising from new developments in the area.

41 Based on the draft supplementary planning guidance the likely child population is 138, giving a play space area requirement of 1,370 sq.m. The proposal provides communal amenity space in the form of sky gardens, communal terraces, the Block A internal courtyard and the Block B internal courtyard, which have a combined total area of 2063 sq.m. This figure excludes the public open space within the scheme.

42 The likely child population can be disaggregated as follows:

Age band totals

Age band	% total	Number of children
0-4	39%	54
5-10	37%	51
11-15	24%	33

43 The response to this requirement is the provision of

- Podium decks providing passive and active recreational facilities and incorporating play space for toddlers. These are green roof systems which also have drainage and irrigation benefits.
- Nature play areas set within informal tree and shrub species. These areas include a green hill with undulating changes in level, a slide, climbing frame, seating, kick about area, sand pit, shade canopy and virtual stream.
- Green roof and brown roof design.

44 The landscaping proposals therefore include doorstep playable spaces but also space designed to be appropriate for 5 – 11 year olds. Allan Gardens is the nearest area of open space to the site and is 280 metres walking distance. This is within the maximum walking distances recommended for 12+ years of age in the Mayor’s draft supplementary planning guidance.

45 Overall, play space is fully integrated into the detailed design and features prominently in the landscaping proposals. The design response has produced attractive, engaging and challenging spaces for children and accords with the London Plan.

Sustainable design and construction

46 The application includes a sustainability appraisal and considers sustainable design and construction measures. The measures meet all the Mayor's essential standards and in some cases meet the preferred standards.

47 The application includes the following measures in response to London Plan Blue Ribbon Network policies. The measures include:

- Use of dual flush toilets.
- Installation of water meters in all properties.
- Target to achieve less than 40 cubic metres of water use in dwellings per bed space per year.
- Rainwater collectors to be provided in the courtyard space for irrigation of green and brown roof areas. Surface water run-off will be harvested into an underground tank which is filtered and then recycled for irrigation purposes.
- All viable sustainable urban drainage system measures will be incorporated including porous pavements, green roofs and basin/filter drains.

Energy

48 The London Plan energy policies 4A.7-4A.9 aim to reduce carbon emissions by requiring the incorporation of energy efficient design and technologies, and renewable energy technologies where feasible. An energy demand assessment is expected along with demonstration of how heating and cooling systems have been selected in accordance with the Mayor's hierarchy. The policies also require a demonstration of how the scheme meets a proportion of its energy demand from renewables with a 10% minimum target.

49 The applicant needs to confirm that the energy efficiency carbon savings have been calculated through the use of appropriate software (other building regulations approved tools). Further detail is required in terms of the energy requirements of the development along with a breakdown of heating, cooling and electricity requirements.

50 The combined heat and power engine appears sub-optimal given the heat demand of the development. The combined heat and power system appears to have been sized to allow for the proposed biomass boiler, and to comply with the 10% renewable. The combined heat and power system should be optimised to meet the thermal demands of the scheme.

Baseline carbon dioxide emissions and energy efficiency

51 In relation to baseline emissions the applicant needs to confirm whether or not 'business as usual' in table 7 refers to the Dwelling Emission Rate (DER), i.e. maximum CO₂ emission allowed by 2006 building regulations.

52 The applicant proposes a series of energy efficiency measures. However, the effect of these measures is not quantified in relation to carbon emissions and it remains unclear as to whether the figures given in the tables have been obtained through modelling.

53 In order to understand the energy usage of the development and its related carbon dioxide emissions the applicant needs to refer to Appendix D of the Mayor's supplementary planning guidance and the applicant should provide an estimation of the cooling, heating and electricity demands/requirements of the development and also carbon emissions. This should be used to

arrive at a baseline and then calculate the carbon saving achieved through energy efficiency design measures. Modelling (using SAP 2005) should be used for the dwellings or other accredited software for the non commercial areas

54 It is not clear whether or not cooling is proposed for the flats or commercial areas. If cooling is proposed this should also be shown in the baseline calculations.

Heating and cooling

55 The applicant is proposing community heating with plant room located in the basement of block A. The combined heat and power engine system seems to have been sized according to the electrical demand of the development and to allow for the addition of biomass boilers. This appears to have resulted in a sub-optimal combined heat and power engine.

56 Irrespective of whether or not the use of a bigger combined heat and power engine displaces the proposed biomass boiler, a bigger engine size should be implemented if the heating requirements demand it and it remains feasible. Although the heat profile has been given the assumptions used for this sizing should be shown within the statement. Domestic hot water and space heating demand are likely to be critical in this respect.

57 If there is a cooling requirement either in the apartments and/or in the commercial spaces the applicant should firstly consider designing this out or consider ground cooling as a means of contributing towards the renewable target.

Decentralised energy

58 New London Plan Policy 4A.5i deals with decentralised energy and states that heating and cooling infrastructure should be designed to allow the use of decentralised energy and for it to be maximised in the future. Developments are expected to evaluate combined cooling, heat and power and combined heat and power and examine opportunities to extend the scheme beyond the site boundary to adjacent areas. The order of preference goes on to state that connections to existing combined cooling, heating & power and combined heating and power distribution networks should be considered first.

59 The applicant rightly identifies the potential scope for an energy hub in this area in the light of emerging strategic developments, most notably the Bishopsgate Yard site across the road. There is considerable scope for decentralised energy in this area allowing more effective use to be made of heating, cooling and power.

60 To accord with the aforementioned policies the applicant should examine opportunities to extend the scheme beyond the site. The GLA would be happy to facilitate discussions with adjacent landowners. However, for the purposes of this application the infrastructure should be designed so that it is capable of being connected to adjacent sites, and should include provision for connections to adjacent sites, particularly the Bishopsgate Yard.

Renewable energy

61 Two small wind turbines are proposed for the roof of the tall building displacing 2.2% of overall carbon dioxide emissions. Further information as to how the carbon savings have been arrived at is required, including assumed turbine size and annual estimated electricity production. The remainder will be met through biomass boilers to supply the communal heating network and to reduce carbon dioxide emissions by a further 18%.

62 As stated above it appears that the combined heat and power system has been undersized relative to development scale. In the light of a resized combined heat and power system the biomass option may become unviable and the applicant may need to explore other renewable possibilities to accord with the London Plan.

63 In sum, therefore, the applicant has demonstrated a strong willingness to address London Plan energy policies but further work is required to: examine and provide for connections to adjacent developments in line with the emerging policies; establish verifiable baseline emissions and demonstrate improvements through energy efficient design; clarify whether or not there will be a cooling load and how this will be met; and re-examine renewable energy options in the light of an optimally sized combined heat and power system.

Transport for London

64 TfL considers that the transport assessment (TA) significantly underestimates public transport trips in the AM and PM periods and the number of trips associated with the proposed development. Furthermore, it fails to make any reference to the cumulative impact of the redevelopment of the Bishopsgate Goods Yard, located immediately to the south of the site. TfL requires further work to be carried out in order to properly assess the impact and necessary mitigation required on the local highway network and footways.

65 TfL considers that the cumulative impact of this development when taken with other development at the eastern side of the city and in the City Fringe area of Tower Hamlets will have a significant impact on the bus network. TfL would like to see new bus standing facilities to be provided as part of this development in order to meet the demands of growth in the area and would welcome further discussions about specific requirements. Furthermore, TfL expects £25,000 contribution for improving the bus stops of Bethnal Green and Shoreditch High Street to fully accessible standards.

66 TfL wishes to see further swept paths analysis to demonstrate that the refuse vehicles are able to manoeuvre within the site and would welcome further discussion with the applicant.

67 The development is deemed to be reliant on access to the new East London Line Station (Shoreditch High Street Station) on Bethnal Green Road. Further contribution is requested towards improving the street environment and walking links between the development and the new station. TfL wishes to discuss this further with the developer.

68 TfL is satisfied with the car parking provision, provided that at least two car parking spaces are permanently set aside for blue-badge holders. TfL expects future residents to be exempt from eligibility for on-street parking permits.

69 TfL welcomes the cycle parking provision of 470 cycle parking spaces. This is in line with TfL's cycle parking standards in the London Plan (Annex 4, paragraph 37) and is acceptable.

70 TfL expects the developer to prepare and agree a construction management plan with TfL and the borough to ensure the safe and continued movement of pedestrians, buses and all other vehicles on the Transport for London Road Network, Strategic Road Network and borough roads throughout the construction phases of this development.

71 TfL welcomes the developer's commitment to provide a travel plan for this development. However, there are a number of aspects which TfL need to see addressed before fully supporting the travel plan. These centre on the monitoring, funding and delivery of the travel plan. TfL expects the travel plan to be secured, enforced, monitored and reviewed as part of the section 106

agreement. It is suggested that the developer liaises with TfL's travel demand management team regarding the development of the travel plan.

72 In conclusion, TfL has no in principle objection to this application provided the above issues are resolved satisfactorily.

Access

73 All the residential units have been designed to 'Lifetime Homes' standards in accordance with the London Plan. Also, 10% of the units are designed to be wheelchair accessible or capable of adaptation, also meeting London Plan standards.

Noise

74 Based on the applicants' noise impact assessment, there are no apparent major strategic noise concerns that are sufficient to lead to a recommendation to direct refusal. However, the Bethnal Green Road side of the site just falls into PPG24 Noise Exposure Category (NEC) D at night, where the advice is that "permission should normally be refused". During the day, this side falls into the upper end of NEC C, and the rear of the site on Sclater Street falls into NEC C at all times. For NEC C, permission should only be granted if alternative quieter sites are not available and if conditions requiring protection against noise are imposed.

75 While it is not unusual to grant permission for residential development in NEC C in London, or even where NEC D is just reached, all practicable steps should be taken to minimise the adverse noise impacts on habitable rooms, especially bedrooms. PPG24 and London Plan policy on noise require that noise sensitive development should be separated from major sources of noise wherever practicable. In this case, consideration should be given to redesigning the internal layouts of the flats to minimise the number of habitable rooms on the noisiest facades and especially to relocating bedrooms away from the lower levels of the Bethnal Green Road facade.

76 Where habitable rooms will be unavoidably exposed to high noise levels (i.e. the facades falling into NEC C & D) and cannot practicably be relocated, suitable acoustic glazing and ventilation will be required. For the ventilation, where windows will need to be kept closed to achieve acceptable internal noise levels, it would be preferable to use passive stacks, or similar systems capable of providing a positive flow of air without additional energy consumption, rather than passive ventilators with more limited airflow or powered mechanical ventilators.

London Development Agency

77 In accordance with the objectives in the London Plan and the Economic Development Strategy, the LDA seeks to promote sustainable growth and economic development and deliver healthy, sustainable, high quality communities and urban environments.

78 This site is located within an Area for Regeneration and therefore the LDA recognises the regeneration benefits associated with this type of development. The site is currently in use as employment land and therefore, as expressed elsewhere in this report, the council should satisfy itself that the site is genuinely surplus to requirements relative to demand.

79 Subject to this, the LDA supports the proposed development as a mixed-use development in line with policy 3B.4 of the London Plan. With regard to the B1 space, to accord with policy 3B.2 Office Demand and Supply, the council should aim to provide a range of types and sizes of office premises in order to meet the needs of all sectors.

80 In addition, the council should seek to ensure that local residents and businesses benefit from the development in order to conform with policy 3B.1 Developing London's Economy and policy 3B.12 Improving the Skills and Employment Opportunities of Londoners. Opportunities for local residents and businesses should be made available in both the construction phase and the non-residential parts of the completed development. For a scheme of this size, the developer should submit an employment and training strategy, which secures implementation, stakeholder and developer involvement, employment and training targets, monitoring requirements and identifies relevant initiatives. In detail an appropriate strategy should cover the following elements:

- Timing and arrangements for its implementation including funding arrangements.
- A stakeholder charter to ensure initial and subsequent employers within the completed development participate in the implementation of the strategy.
- Minimum local recruitment targets for employees and targets for the involvement of local businesses and measures to be undertaken by the applicant to meet with these targets.
- Periodical workforce and business monitoring and reporting of the results to the Council and such other parties as may be set out in the approved strategy.
- A programme for skills training for local residents and/or businesses, including the potential for the provision of suitably equipped training premises.
- Local publicity, awareness raising proposals and methods for advertising employment opportunities and impending contracts.
- Initiatives to promote the involvement of local businesses including sub-contracting and the supply of goods and services.
- Initiatives to promote the employment of small and medium businesses.
- Initiatives to promote the employment of black and ethnic minority owned businesses.

81 The delivery of such initiatives will assist in ensuring the regeneration benefits of the proposed development are maximised for local residents, and that the objective to tackle barriers to employment set out in the Economic Development Strategy is met.

82 In conclusion, the LDA supports the principles of this proposed mixed-use development. However, the council should ensure that they are confident that the land is surplus to current and future demand and that the regeneration benefits of the development are maximised through the an appropriate s106 agreement between the developer and the council.

Local planning authority's position

83 Officer's recommendation not yet known.

Legal considerations

84 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Tower Hamlets Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's comments unless specifically stated.

Financial considerations

85 There are no financial considerations at this stage.

Conclusion

86 The application contains an appropriate mix of uses for this City Fringe Opportunity Area location, maximising its potential compatible with local context broadly in accordance with London Plan design principles. However, a number of detailed design issues require further attention.

87 In the absence of a financial appraisal it is not possible to conclude that the scheme achieves the maximum reasonable amount of affordable housing in line with the London Plan or that grant is being used effectively.

88 Further work is required to adequately address existing and emerging London Plan energy policies in respect of decentralised energy, renewable energy and energy efficiency.

89 TfL has no in principle objection to this application provided the issues raised above are resolved satisfactorily before the application is referred back to the Mayor for a decision.

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