

LBTH Ref: PF/19/00091

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23 May 2019

Dear Charles Carter,

**Pre-application planning advice**

**Site: Former Land Adjacent To 9 To 11, Christian Street, London**

**Proposal: Potential self-build housing site**

I am writing to provide the Council's pre-application planning advice regarding the above proposal, which has been prepared at officer level based on plans received:

- Potential self-build and/or cohousing sites document.

**1. Site and Surrounding Area**

The pre-application site is a vacant square plot of land of approximately 58sqm. The site is located on the western side of Christian Street, and is directly adjacent to the Markazi Masjid Mosque. The site is located within a Tower Hamlets (City Fringe) Activity Area, and within an Archaeological Priority Area (Tier 1). The site is not located within a conservation area or in close proximity to any listed buildings.

**2. Relevant Planning History**

PA/02/01456: Erection of a three storey building with loft comprising ground floor shop with flat above. Permitted – 06/05/2003.

**3. Relevant Planning Policy**

Government Planning Policy

National Planning Policy Framework 2019

London Plan MALP 2016

- 3.3 - Increasing housing supply
- 3.4 - Optimising housing potential
- 3.5 - Quality and design of housing developments
- 3.6 - Children and young people's play and informal recreation facilities
- 3.8 - Housing choice
- 3.9 - Mixed and balanced communities
- 5.2 - Minimising carbon dioxide emissions
- 5.3 - Sustainable design and construction
- 5.6 - Decentralised energy in development proposals

- 5.9 - Overheating and cooling
- 5.10 – Urban greening
- 5.11 - Green roofs and development site environs
- 5.12 - Flood risk management
- 5.13 - Sustainable drainage
- 5.17 – Waste capacity
- 6.3 - Assessing effects of development on transport capacity
- 6.9 - Cycling
- 6.10 - Walking
- 6.13 - Parking
- 7.1 - Lifetime neighbourhoods
- 7.2 - An inclusive environment
- 7.3 - Designing out crime
- 7.4 - Local character
- 7.5 - Public realm
- 7.6 - Architecture
- 7.8 - Heritage assets and archaeology
- 7.14 - Improving air quality
- 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.18 - Protecting local open space and addressing local deficiency
- 7.19 – Biodiversity and access to nature
- 8.2 - Planning obligations

#### Core Strategy 2010

- SP02 - Urban living for everyone
- SP03 - Creating healthy and liveable neighbourhoods
- SP04 – Creating a green and blue grid
- SP05 - Dealing with waste
- SP09 - Creating attractive and safe streets and spaces
- SP10 - Creating distinct and durable places
- SP11 - Working towards a zero-carbon borough
- SP12 - Delivering placemaking
- SP13 - Planning Obligations

#### Managing Development Document 2013

- DM3 - Delivering homes
- DM4 - Housing standards and amenity space
- DM11 - Living buildings and biodiversity
- DM13 - Sustainable drainage
- DM14 - Managing Waste
- DM20 - Supporting a sustainable transport network
- DM22 - Parking
- DM24 - Place sensitive design
- DM25 - Amenity
- DM27 - Heritage and the historic environments
- DM29 - Achieving a zero-carbon borough and addressing climate change

#### Supplementary Planning Guidance/Documents and Other Documents

##### *Tower Hamlets*

- Planning Obligations SPD (2016)

##### *Mayor of London*

- Shaping Neighbourhoods: Character and Context (2013)
- Housing (2016)

#### Emerging Policy

Statutory public consultation on the draft London Plan commenced on the 1st of December 2017 and closed on the 2nd of March 2018. This is the first substantive consultation of the London Plan, but it has been informed by the consultation on 'A City for All Londoners' which took place in Autumn/Winter 2016.

The current 2016 consolidation London Plan is still the adopted policy. However the Draft London Plan is a material consideration in planning decisions. It gains more weight as it moves through the process to adoption; however the weight given to it is a matter for the decision maker.

The draft local plan titled 'The Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits' has finished the Examination in Public and minor modifications are being undertaken. The weighting of draft policies is guided by paragraph 48 of the National Planning Policy Framework (2019).

## **5. Main planning considerations**

### **Land Use**

#### *Existing use*

The site is partly used as a car parking area and also for waste storage, potentially for the neighbouring building. It is expected that discussions with the neighbouring mosque should take place in order to establish whether the site has any formal arrangements for the car parking and waste storage. The car parking is likely not to be necessary for the mosque in light of the 'very good' public transport accessibility (PTAL score 5) of the site, however the waste management plan of the mosque may need to be amended, if the site were to be developed.

#### *Self-build*

Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.

As self-build is not currently a mainstream housing product, the planning policy background is limited. Draft Local Plan Policy S.H1 mentions a duty of the Council to support local demand for self-build, and to support a variety of housing products. The policy further describes how group self-build has the potential to deliver significant additional housing and is encouraged as a more viable self-build model in the borough. Draft London Plan Policy H12 states that decision-makers should have regard to the potential for custom-build housing schemes. The Council maintains a list of self-build sites and is currently establishing appropriate development parameters.

#### *Co-housing*

In regards to the proposed residential units, the London Plan seeks to alleviate the current and projected housing shortage in the capital through provision of an annual average of 32,210 of new homes over a ten year period. The need to address the pressing demand for new residential accommodation is embraced by the Policy SP02 which states that 43,275 new homes are required from 2010 to 2025. In light of the pressing need and high demand for new housing, it is considered that the proposed new residential uses could be supported in principle.

As co-housing is not currently a mainstream housing product, the planning policy background is limited. Draft Local Plan Policy H2 supports new housing on small sites and those wishing to bring forward custom build, self-build and community led housing. Draft Local Plan Policy S.H.1 describes how development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need, supporting a variety of housing products in the market and affordable tenures which meet local need. Draft Local Plan Policy D.H7 supports housing with shared facilities as long as it can be secured as a long-term addition to the supply of low cost housing. Co-housing units should also comply with relevant housing space standards.

The Council's affordable housing service will use evidence from the latest strategic housing market assessment to assess proposed rent levels to determine whether development would provide housing

with shared facilities for people with low incomes. Draft London Plan Policy H12 states that decision-makers should have regard to the potential for community-led housing schemes. In summary, subject to ensuring the legitimacy of the co-housing model, this model of housing could be supported, as long as all other policy considerations are complied with.

### Heritage and Design

The applicant should reference the previously approved application (PA/02/01456) on-site in regards to potential height, footprint and massing. The previously approved scheme consisted of a 3 storey building with a rear dormer in the pitched roof. This provided a commercial unit at ground floor and residential accommodation over the first, second and loft floors. However the previous proposal appears to have taken up a greater footprint than the proposed site area. In light of the above, it is considered that the site could potentially accommodate 1 or 2 residential units, depending on unit types.

Design and materials should reference surrounding buildings and high quality contemporary housing in order to justify the architectural style going forwards. The GLA's London Housing SPG and Urban Design London's 'A New London Housing Vernacular' should be consulted in future designs. Secure by Design Metropolitan Police officers should also be consulted on a future scheme.

### Housing

#### *Internal Space*

Potential units must meet minimum internal space standards referenced by Policy DM4. Units should benefit from dual aspect outlook – the previously consented scheme included west and east-facing outlook. Units should benefit from adequate defensible space to ground floor windows through gardens or planters or railings with separation. If the housing were to operate as co-housing, the shared communal spaces would need to be provided in addition to units which meet minimum internal space standards individually. Ground floor residential windows could be problematic in regards to compromised privacy from passers-by on Christian Street.

#### *Amenity space*

Each individual unit must be provided with its own private open space in accordance with standards referenced by Policy DM4 and Standards 26 and 27 of the London Housing SPG. This could be provided in the form of front, rear or roof gardens, balconies, or terraces.

#### *Tenure mix/affordability*

Further clarification would need to be provided on the tenure model proposed. Co-housing is a relatively new product to mainstream housing and so the policy background is still limited. It is understood that the housing would operate as 'affordable,' however this would not appear to fall under the Council's affordable housing products, and would not strictly fall under the usual definitions of market or intermediate housing.

Draft Local Plan Policy S.H1 requires the provision of affordable housing contributions on sites providing 2 to 10 new residential units against a sliding-scale target (subject to viability). Draft Local Plan Policy D.H7 states that housing with shared facilities should be secured as a long term addition to the supply of low cost housing or otherwise provide an appropriate amount of affordable housing.

It is understood that the Council's target is to secure the self-build housing as affordable in perpetuity. It is understood that a restrictive covenant could be added to the deeds of the land to ensure that housing on the site would be affordable in perpetuity. If there were less than 10 units on-site, there would not necessarily be a planning policy hook for the affordable housing to be secured via S106 agreement, in accordance with the Planning Obligations SPD (2016), and so the logistics of this aim need to be carefully considered.

### Amenity

Care must be taken to ensure that mutual overlooking does not occur and so proposed floor plans showing the locations of windows should be provided. The 18m guideline separation distance between habitable room windows of neighbouring properties should be taken into consideration. The

rear of 21 Stutfield Street is approximately 16.5m from the north side of the site. Outlook and sense of enclosure to nearby residential units must also be protected. A noise impact assessment should be provided to ensure that the residential uses would not be adversely impacted by the activities of the adjacent mosque.

### Highways and Servicing

The site benefits from 'very good' public transport accessibility (PTAL 5) and so any future development would need to be car-free, secured by legal agreement, in accordance from London Plan Policy 6.13. Secure and sheltered cycle parking stands (ideally Sheffield type) should be provided at ground floor level in accordance with London Plan Policy 6.9. The London Cycle Design Standards should be consulted before submission. You may wish to contact LBTH Highways ([matt.kent@towerhamlets.gov.uk](mailto:matt.kent@towerhamlets.gov.uk)) for further details.

In accordance with Policy DM14, refuse stores for future development must be provided within the following brief. Doors should not open out to the footway for reasons of highways safety. Details of waste streams and bin capacities should be included. The following is the latest residential waste capacity guidelines: Studio / 1 Bedroom: Refuse: 70 litres, Recycling: 50 litres, Compostable: 23 litres 2 Bedroom: Refuse: 120 litres, Recycling: 80 litres, Compostable: 23 litres 3 Bedroom: Refuse: 165 litres, Recycling: 110 litres, Compostable: 23 litres 4 Bedroom: Refuse: 215 litres, Recycling: 140 litres, Compostable: 23 litres. The applicant is required to ensure all residential units are provided with internal waste storage preferably within the kitchen units with the following capacity: Refuse – 40 litres Recycling – 40 litres, Food waste – 23 litres.

The bin store must be large enough to store all containers with at least 150mm distance between each container and the width of the door must be large enough with catches or stays. The bin store must also be step free. The waste carrying distance for all residents must be a maximum of 30 meters. The applicant should ensure that the bin storage areas must be within 10 metres wheeling distance of the waste collections vehicle. The paths between bin stores and the collection point must be a minimum width of 1.5 metres, be free from kerbs or steps, have a solid foundation and be suitably paved with a smooth continuous finish. The ground should preferably be level and, in any case, must not have a gradient greater than 1 in 20 towards the vehicle. The applicant is required to ensure that all surfaces have suitable foundations and surfaces to withstand the maximum payload of vehicles. You may wish to contact LBTH Waste ([Zahir.dehgamia@towerhamlets.gov.uk](mailto:Zahir.dehgamia@towerhamlets.gov.uk)) in regards to confirmation of detailed technical specifications.

### Environmental Considerations

#### *Biodiversity*

The application site does not currently have any biodiversity value. Proposed development should deliver net gains for biodiversity in accordance with Policy DM11. These should be delivered through biodiversity features on the site such as biodiverse green/brown roofs on new buildings; tree planting; a good diversity of nectar-rich flowers in landscaping; bat boxes and sparrow terrace nest boxes built into or attached to the new buildings.

#### *SUDS*

Sustainable drainage systems (SUDS) are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to; reduce the causes and impacts of flooding, remove pollutants from urban run-off at source, combine water management with green space with benefits for amenity, recreation and wildlife. A SUDS report should be submitted at application stage.

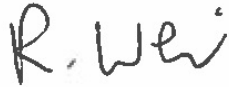
#### *Archaeology*

The site is located within an Archaeological Priority Area (Tier 1). In accordance with Policy DM27, an Archaeological Evaluation Report should be provided and will require any nationally important remains to be preserved permanently on-site, subject to consultation with Historic England.

## **6. Summary**

This letter has set out the Local Planning Authority's general planning parameters for the site. I trust you find the content of this letter useful to developing the scheme further and please do not hesitate to contact me if you require any clarification on the content of the letter. Please note that this letter provides officer level advice based on the information available and does not prejudice the outcome of any future planning applications.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'R. Weir'. The signature is written in a cursive, slightly informal style.

Rikki Weir BA (Hons) MSc MRPTI  
*Planning Officer, West Area Team*